

U.S. DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

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NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL
QUALITY AND INTEGRITY (NACIQI)

+ + + + +

MEETING

+ + + + +

TUESDAY
JULY 30, 2019

+ + + + +

The Advisory Committee met in the Grand Ballroom of the Hilton Hotel, 1767 King Street, Alexandria, Virginia 22314 at 8:30 a.m., Arthur Keiser, Chairman, presiding.

PRESENT

ARTHUR KEISER, Chairman
FRANK WU, Vice Chairman
KATHLEEN SULLIVAN ALIOTO, Member
SIMON BOEHME, Member
JILL DERBY, Members
PAUL LeBLANC, Member
ANNE NEAL, Member
RICHARD O'DONNELL, Member
SUSAN PHILLIPS, Member
CLAUDE PRESSNELL, JR., Member
RALPH WOLFF, Member
FEDERICO ZARAGOZA, Member

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STAFF PRESENT

JENNIFER HONG, Designated Federal Official and
Executive Director of Committee
HERMAN BOUNDS, Director of Accreditation Group
ELIZABETH DAGGETT, Department Staff
NICOLE HARRIS, Department Staff
CHARITY HELTON, Department Staff
IRIS HINH, Intern
VALERIE LEFOR, Department Staff
DONNA MANGOLD, Office of General Counsel
STEPHANIE McKISSIC, Department Staff
MADELINE ONG, Intern
JUSTIN SETTLES, Department Staff
ANGELA SIERRA, Office of General Counsel

ALSO PRESENT

KAREN MARTENS BRANDT, Director, Education and
Research, AVMA
SONYA CHRISTIAN, Vice Chair, ACCJC
KEVIN B. DONNELLY, Member, ACMA-COE
STEPHANIE DROKER, Senior Vice President, ACCJC
PAUL DUNLOP, Chair, ACCET
BERNARD FRYSHMAN, Interim Executive Director,
Association of Advanced Rabbinical and
Talmudic Schools
JUDY HENDRICKSON, Deputy Executive Director,
ACCET
SPENCER A. JOHNSTON, Vice Chair, AVMA-COE
LAURA RASAR KING, Executive Director, CEPH
WILLIAM V. LARKIN, Executive Director, ACCET
LINSAY OAKDEN, Assistant Executive Director,
ACCET
MARY A.Y. OKADA, President, Guam Community
College
JOHN SHAHEEN, Associate Executive Director,
ACCET
IAN WALTON, Chair, ACCJC
RICHARD WINN, President, ACCJC

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1 P-R-O-C-E-E-D-I-N-G-S

2 8:30 a.m.

3 CHAIR KEISER: If everybody could
4 please be seated, we'll get started. You're up,
5 Jennifer.

6 MS. HONG: Good morning and welcome,
7 everybody. This is a meeting of the National
8 Advisory Committee on Institutional Quality and
9 Integrity, also known as NACIQI. My name is
10 Jennifer Hong, and I'm the executive director and
11 designated federal official of NACIQI.

12 As many of you know already, NACIQI was
13 established by Section 114 of the Higher Education
14 Act of 1965, as amended, or HEA, and is also
15 governed by provisions of the Federal Advisory
16 Committee Act, as amended, also known as FACA,
17 which sets forth standards for the formation and
18 use of advisory committees.

19 Sections 101(c) and 487(c)(4) of the
20 HEA and Section 801(6) of the Public Health Service
21 Act, 42 U.S.C. Section 296, require the Secretary
22 to publish lists of state approval agencies,

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1 nationally recognized accrediting agencies, and
2 state approval and accrediting agencies for
3 programs of nurse education that the Secretary
4 determines to be reliable authorities as to the
5 quality of education provided by the institutions
6 and programs that they accredit. Eligibility of
7 educational institutions and programs for
8 participation in various federal programs requires
9 accreditation by an agency listed by the Secretary.

10 As provided in HEA Section 114, NACIQI
11 advises the Secretary in the discharge of these
12 functions and is also authorized to provide advice
13 regarding the process of eligibility and
14 certification of institutions of higher education
15 for participation in the federal student aid
16 programs authorized under Title IV of the HEA.

17 Further, in addition to these charges,
18 NACIQI also authorizes academic graduate degrees
19 for federal agencies and institutions. This
20 authorization was provided by letter from the
21 Office of Management and Budget back in 1954.

22 This letter is available on the NACIQI

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1 website, along with other records related to
2 NACIQI's deliberations. I'd like to extend a big
3 thank you on behalf of the department to the members
4 whose terms are expiring after this meeting, Simon
5 Boehme, John Etchemendy, Susan Phillips, Frank Wu,
6 and Federico Zaragoza have all contributed
7 significantly to the work we do here, and we are
8 very grateful for your service, so thank you.

9 This is our first and only meeting in
10 2019. As you may know, our meeting scheduled for
11 February 2019 was canceled due to the lapse of
12 appropriations. So thank you all for being here.

13 We'll take on the agencies that were slated for
14 February, as well as the agencies that are slated
15 for this meeting, all at this meeting. With that,
16 I'm very happy to hand it off to our able chairman,
17 Art Keiser.

18 CHAIR KEISER: Thank you, Jennifer.
19 Welcome, everybody. I also am going to take a
20 point of personal privilege. We did lose a member
21 this last year. If we could have a moment of
22 silence for Bobbie Derlin, who was just one of the

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1 most fabulous members of this committee. I so much
2 enjoyed working with her, so if we could have a
3 moment of silence.

4 (Moment of silence.)

5 CHAIR KEISER: Thank you, everyone.
6 If I may have each of the members of the committee
7 introduce themselves. Susan, you're the first.

8 MS. PHILLIPS: Susan Phillips,
9 professor and provost emerita, University at
10 Albany, State University of New York.

11 MR. BOEHME: Simon Boehme, student
12 member.

13 MR. WOLFF: Ralph Wolff, president of
14 the Quality Assurance Commons.

15 MS. ALIOTO: Kathleen Alioto, advocate
16 for ZERO TO THREE Education.

17 MS. DERBY: Jill Derby, senior
18 consultant with the Association of Governing
19 Boards of Universities and Colleges.

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

22 MR. BOUNDS: Herman Bounds, director

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1 of the accreditation group at the U.S. Department
2 of Education.

3 MS. HONG: Jennifer Hong, executive
4 director of the committee.

5 CHAIR KEISER: Art Keiser, Chancellor,
6 Keiser University.

7 MS. MANGOLD: Donna Mangold,
8 Department of Education, Office of General
9 Counsel.

10 MS. SIERRA: Angela Sierra, Department
11 of Education, Office of General Counsel.

12 VICE CHAIR WU: Frank Wu, faculty,
13 University of California.

14 MR. LEBLANC: Paul LeBlanc, president,
15 Southern New Hampshire University.

16 MS. NEAL: Anne Neal, senior counsel,
17 American Council of Trustees and Alumni.

18 MR. ZARAGOZA: Federico Zaragoza,
19 president, College of Southern Nevada.

20 MR. PRESSNELL: Claude Pressnell,
21 president of the Tennessee Independent Colleges
22 and Universities.

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1 CHAIR KEISER: Again, welcome,
2 everyone. We have a busy two days, so appreciate
3 your help in getting through all the agenda. Now
4 I would like to introduce a special guest who's
5 here with us today.

6 Her name is Diane Auer Jones, who is
7 the Principal Deputy Under Secretary of the
8 Department of Education and was delegated the
9 duties of the Under Secretary and Assistant
10 Secretary for Postsecondary Education. Diane has
11 a diverse background in higher education, having
12 spent the first ten years of her career serving
13 as a biology professor at the Community College
14 of Baltimore County and later working at Princeton
15 University and Career Education Corporation.

16 Diane has also an extensive background
17 in the science in education policy, having worked
18 at the National Science Foundation, for the U.S.
19 House of Representative's Committee on Science,
20 and for the White House Office of Science and
21 Technology Policy.

22 She served as Assistant Secretary for

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1 Postsecondary Education with the Department of
2 Education during the George W. Bush
3 administration. Prior to rejoining the
4 Department of Education, she has served as a senior
5 policy advisor to the Secretary of Labor and
6 focused on workforce development issues, including
7 the expansion of apprenticeships in the United
8 States. Please welcome with me Diane Auer Jones.

9 ACCREDITATION RULES EFFECTIVE JULY 2020

10 MS. JONES: Good morning, everyone.
11 Thanks, Art, so much, for the introduction. I'm
12 really delighted to be here. As Jennifer
13 mentioned, we are sorry that this is the only
14 meeting for 2019, but a government shutdown and
15 the inability to publish in the Federal Register
16 required us to postpone our earlier meeting.
17 We're hoping for better results in 2020, but we'll
18 see.

19 I realized, as you were reading my bio,
20 that we need to update my bio. I am no longer the
21 acting assistant secretary. Thank God, Bob King
22 is in place. He was confirmed a few weeks ago.

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1 He is the Assistant Secretary for Postsecondary
2 Ed, and I hope you all will get to know him.

3 We're really excited that he's joined
4 us, probably nobody more excited than I am to have
5 him as a new colleague. I also wanted to mention
6 we're lucky to have Donna and Angela with us today,
7 but those of you who have followed NACIQI may
8 recognize that Sally Morgan isn't here.

9 Sally has moved into a well-deserved,
10 hard-earned retirement. It seems hard to believe
11 that we could have a NACIQI meeting without Sally,
12 but she has retired, apparently very happily so
13 because we haven't heard from her, so she must be
14 really enjoying life. Donna and Angela, thanks.
15 She earned it.

16 I wanted to just take a few minutes this
17 morning to update all of you on a couple of changes
18 that we have made or that we see coming in the
19 future. I think when we last met, which was maybe
20 a year and a half ago, we talked about the work
21 that we were doing to rethink accreditation as part
22 of the Secretary's Rethink Higher Education

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1 agenda.

2 You may not have seen, we've actually
3 published the Secretary's Rethink document, and
4 we actually stuck with that document as we went
5 into negotiated rulemaking. I hope that what you
6 saw as we went into negotiated rulemaking is that
7 we adhered to the principles that we laid out in
8 the Rethink Higher Ed.

9 We were very fortunate to have an
10 amazing group of negotiators when we entered into
11 negotiated rulemaking on accreditation. A lot of
12 people in this town owe me beers and dinners because
13 nobody thought we could come to consensus, but I
14 knew we could. I knew if we hung in there and we
15 kept talking and we kept working, and we even
16 extended the time, I knew we could get there. We
17 got there by, frankly, talking less about our own
18 parochial interests and more about what's the right
19 thing to do for students. And so I'm thrilled that
20 we came to consensus on all of our regs, including
21 the accreditation package.

22 As you know, the NPRM has been

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1 published. We received somewhere around 200
2 comments, maybe just under-ish, so we're in the
3 process of responding to those comments. So I want
4 to give an overview for those of you who -- I can't
5 imagine there's somebody in this audience that
6 didn't hang on every word of negotiated rulemaking
7 and watch every minute of the live stream, but just
8 in case you didn't, I wanted to go through, at a
9 high level, some of the changes that are part of
10 the consensus language that were in the NPRM.

11 We can't talk about the final rule until
12 it is a final rule, but I just wanted to quickly
13 summarize what was in the consensus language. I
14 think probably at the top of our list was working
15 hard to end the mythology that regional and
16 national accreditation are somehow different. We
17 hold all accreditors to the same set of standards.

18 Institutional accreditors, regardless of whether
19 they are regional or national, are held to the same
20 standards. And therefore we are eliminating the
21 terms regional and national from our vocabulary.

22 It is no longer part of an accreditor's scope.

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1 We thought that was very important for
2 a couple of reasons. One, we hold all accreditors
3 to the same standards, and, two, that distinction
4 was creating all kinds of challenges for students,
5 who found themselves unable to transfer credits
6 simply because of who accredited their
7 institution.

8 And the consensus language calls on
9 institutions to do the hard work of actually
10 looking at what the students accomplished, looking
11 at the course content, trying to understand what
12 the student should reasonably be given credit for,
13 rather than taking the blunt instrument approach
14 of saying we will accept credits based on who
15 accredits the institution.

16 We know that's a large shift, but you
17 will see that -- I think we will probably still
18 all use some old terminology as we're getting used
19 to the new terminology, but you will see, on our
20 website, that we will recognize institutional
21 accreditors and programmatic accreditors, and we
22 will not make a distinction. Geography is no

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1 longer part of scope. It is just one of the things
2 that will be listed about an accreditor, and it
3 will include every state in which the accreditor
4 accredits an institution, not just main campuses.

5 That is a fundamental shift that we
6 think is in the best interest of students and in
7 the interest of tax payers, who should not be paying
8 for courses twice, but most importantly for
9 students because it's not just the price of paying
10 for a class twice; it's the opportunity cost of
11 a student who has done well and learned, and then
12 has to start over again.

13 We have also re-introduced the concept
14 of substantial compliance. When I was at the
15 department in the past, we had a substantial
16 compliance standard. The consensus language
17 would restore it, the idea being that if an
18 accreditor is doing everything right, but forgot
19 to have one paper signed or maybe has one typo in
20 the policy manual, they are substantially
21 compliant. And when we have to make binary
22 decisions between compliant and not compliant, two

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1 things happen. One, we withhold a clean bill of
2 health from an accreditor that is, by and large,
3 doing everything right.

4 But two, what we see more often than
5 not is the little things just don't get talked about
6 because you don't want to find somebody in
7 non-compliance for some little thing. But the
8 problem is little things can grow into big things
9 if we don't address them soon and deal with them.

10 So the idea of substantial compliance
11 is just that. If an accreditor is largely
12 compliant and there's one little thing, we actually
13 want to talk about the one little thing to make
14 sure they come into compliance, but we don't
15 necessarily need to withhold a recognition, drag
16 them back here, take up more time and cost more
17 money to them and to us for one little thing.

18 Now that one little thing can't be a
19 really big thing, so an accreditor that misses one
20 big thing could be found not to be compliant, but
21 it's the little things that we want to
22 differentiate between. And we think that

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1 accreditors will then pass that on to their
2 institutions to say let's look at the majority case
3 here. I think we all know that there are unusual
4 and exceptional circumstances that come up from
5 time to time, and we need to address them, and we
6 need to do so in the best interests of students.

7 There are times when we have to look
8 at the totality of the situation. We really want
9 to spend more time and energy; we want accreditors
10 to spend more time and energy focusing on what
11 matters most, which is the student experience.

12 We think that accreditation, over time,
13 has become focused on bureaucracy, paperwork,
14 pages and pages and pages of documents, and what
15 we really want is accreditors to be focused on the
16 student experience.

17 What's happening in the classroom?
18 What's happening with student services? What's
19 happening on the campus? Are the students getting
20 employed afterwards? Do the students feel like
21 they had a good experience? And so what we're
22 really focusing on, then, is accountability, but

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1 mission-driven accountability. We think that
2 accreditors -- we think one-size-fits-all
3 standards can't possibly work. And the idea is
4 that if you can have standards that are
5 appropriate, based on the mission of the
6 institution, you actually can hold that accreditor
7 to a higher set of standards. But when you put
8 the impossible dream out there, it becomes very
9 easy to say we could never hit that.

10 Our idea is that every institution
11 should have a target ahead of them that they're
12 trying to meet. That target needs to make sense
13 based on their mission and the students that they
14 serve.

15 We do want to make sure that there is
16 respect for religious missions. That has always
17 been in statute and always been in our regs, but
18 we felt like we needed to strengthen that because
19 there have been some instances where decisions have
20 been made about institutions based on the tenets
21 of their faith and not the quality of their
22 programs.

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1 We, in the consensus language, have
2 clarified that while we tend to think of one form
3 of institutional governance and decision making,
4 nowhere in the world does it state that's the only
5 way to have governance in decision making. In
6 particular, when it comes to occupationally
7 focused programs, career and technical education
8 programs, where we need to more quickly keep pace
9 with the demands of industry, we can't have a
10 process that takes two years to update every
11 curricular change.

12 So we've said, in particular in
13 vocationally focused programs, you may need a
14 different decision-making pathway that involves
15 different stakeholders, so that you can more
16 quickly update the curriculum and keep pace with
17 change, especially in technology.

18 We have created, through the consensus
19 language, safe zones for innovation, the idea being
20 that an institution that is otherwise in good
21 standing and with very high guardrails and a clear
22 decision by the accreditor and its decision making

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1 body should have an opportunity to experiment in
2 ways that are maybe outside of our current way of
3 thinking.

4 Of course, that has to be monitored
5 carefully, and that experiment has to be ended if
6 it's proving to be unsuccessful. But in so doing,
7 the accreditor may need to develop an alternative
8 set of standards, which doesn't mean lower rigor,
9 but it could mean a different way to prove the
10 accountability, based on the terms of the
11 experiment or the innovation. Another thing
12 you'll see in the consensus language is that -- I
13 think we all know this. So in the current regs,
14 you have 12 months to come into compliance.

15 What we see is, over and over and over
16 again, an extension for good cause. We think we
17 ought to just be honest and say that some
18 corrections have to take place immediately, but
19 other corrections, like student outcomes, could
20 take years to achieve, especially if that means
21 changing your curriculum, changing your admissions
22 practices.

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1 If you're enrolling a new class and
2 putting them through a new curriculum, you may not
3 see the fruits of that labor instantaneously. So
4 we want accreditors to have the ability to give
5 up to four years for corrective action.

6 We think, in many cases, accreditors
7 have done that anyway, but they've done it by a
8 series of good cause extensions. We think a better
9 way to do it, and the consensus language supported
10 this, come up with the right amount of time and
11 have checkpoints along the way. So it's not like
12 you ignore a problem for four years; but you may
13 have a series of checkpoints along the way to make
14 sure that the accreditor is moving toward a
15 successful remediation. For big things, you don't
16 get four years. You don't get four years to fix
17 fraud. You don't get four years to rewrite your
18 policy manual.

19 I think we're all reasonably
20 intelligent people who have a lot of faith in our
21 agencies to say they can differentiate between an
22 immediate change that needs to take place and

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1 something that more realistically is going to take
2 some time.

3 So we have -- that is part of the
4 consensus language. We have created, through the
5 consensus language, new on-ramps for accreditors.

6 So we all know the catch-22 of becoming a new
7 agency.

8 If you are a new agency and you want
9 to accredit institutions that are already
10 accredited, what institution is going to leave its
11 current institutional accreditor to go into the
12 big unknown and to partner with a new accreditor
13 that hasn't yet been recognized? Few. If a new
14 accreditor comes in and they're only accrediting
15 new institutions, then there's this narrative
16 about it's not a good accreditor because they
17 couldn't get any of the existing institutions.
18 What we realize is that you need an on-ramp that
19 allows a new accreditor to accredit institutions
20 that already have accreditation, and you need to
21 give that institution time to potentially change
22 who their Title IV gatekeeper is.

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1 Basically, a new accreditor would have
2 a period of time of years, so they have to come
3 in having accredited an institution or a program,
4 and they have to have at least one that says if
5 recognized, that institution would switch to that
6 accreditor as a Title IV gatekeeper, but we're not
7 going to require the institution to make that
8 switch before the accreditor is recognized.

9 Again, high standards for new
10 accreditors. There's no change in that regard.

11 They do have to have accredited an institution,
12 but we do need to have an opportunity for them to
13 work with institutions that are already accredited
14 and give time for that institution to make a switch
15 for Title IV gatekeeping purposes. Otherwise,
16 you're putting students at risk, and you just can't
17 do that.

18 We have increased scrutiny on things
19 like new graduate programs and, in particular, when
20 it's because of credential inflation. When an
21 agency says this program has always been at the
22 associate's degree, but now we think it needs to

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1 be at the bachelor's degree, we want to look hard
2 and make sure it really needs to be there.

3 There are huge costs to students when
4 the credential level goes up. We've heard from
5 witnesses that have said if you raise this from
6 a bachelor's to a master's, our students can't
7 afford to do this. Basically, we need to make sure
8 that employers are not only demanding the
9 higher-level credential, but they're going to pay
10 for it, that salaries are going to be adjusted
11 accordingly, so that it's not just the student
12 taking on more debt to earn the same amount of money
13 because somebody thinks it would be nice to have
14 a graduate degree.

15 This needs to be empirically based, and
16 there needs to be support within the community.

17 In addition to on-ramps, we realized that we
18 needed to create off-ramps. We think oftentimes,
19 accreditors -- certainly, we, at the department,
20 and we see this with states -- it is really hard
21 to withdraw recognition, accreditation, Title IV
22 or state authorization when you know that that act

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1 is going to turn students out onto the street.
2 And in fact, I think all of us wait a little bit
3 too long to take action because of that.

4 If the consensus language continues to
5 be what's in the final reg, we have created
6 off-ramps that have said you know what, this is
7 an institution that has either itself determined,
8 or somebody in the triad has determined, simply
9 cannot continue to operate, but the off-ramp says
10 we can come to an agreement that your accreditation
11 will be removed or your Title IV participation will
12 be removed or your state authorization will be
13 removed, but we're giving you 120 days' notice.

14 We're giving students 120 days' notice,
15 which means that all of the adults involved in that
16 student's life can come together and help that
17 student find a path forward through a teach-out
18 program or transfer to another institution. So
19 we actually believe that people will be more likely
20 to hold institutions accountable if they know that
21 there is 120 days.

22 Or less. An accreditor could say this

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1 infraction is so bad we're not going to give you
2 the 120 days. So there are extreme circumstances
3 where you would not have an off-ramp, but in a
4 typical situation, the college is doing well, the
5 students are happy, and there's just an untenable
6 budget situation, they see the end is near, let's
7 all be honest about it and work with the students,
8 so that we can help them transition, and we don't
9 have situations where people are just thrown out
10 onto the street.

11 So the idea of an off-ramp is to help
12 students find a path forward. In addition, we have
13 beefed up the requirements for teach-out plans.

14 We've given accreditors the authority, through
15 the consensus language, to demand them earlier,
16 and we also, in the consensus language, have made
17 it clear that accreditors do need to start looking
18 at teach-out agreements long before the closure
19 is announced.

20 If you don't look at an agreement until
21 the closure is announced, it's too late. So we
22 think teach-out agreements need to be more robust,

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1 including a list of all of the programs and all
2 of the potential schools nearby or online that
3 could take the students.

4 We are working really hard to reaffirm
5 the importance of each member of the triad. We
6 think, over time, more and more got dumped on
7 accreditors. It's easy. They're
8 non-governmental, so both states and the feds just
9 kept pushing stuff onto accreditors.

10 We want to get everybody back in their
11 own lane. The states do have a role to play, and
12 we have a role to play, and it's not fair for the
13 department to expect accreditors to be doing our
14 oversight for us. The department has its
15 oversight role, accreditors have theirs, and
16 states have theirs.

17 We're working hard to reunite the three
18 prongs or the three, whatever, legs of the stool,
19 to make sure that we're all working together. And
20 along those lines, we have re-instated the state
21 authorization or the state liaison function within
22 the accreditation group.

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1 We are a triad. All three of us are
2 together. It is not about pointing blame at one
3 member of the triad. It is about all of us coming
4 together and addressing issues together and making
5 hard decisions together, so we really hope to
6 reinforce that the triad has three components, and
7 all three of us have an important role to play.

8 We have clarified that
9 pre-accreditation is an accredited status. We
10 know that a year or two ago, there was a lot of
11 conversation about retroactive accreditation.
12 This body has about 120 pages of testimony and
13 dialogue about it. And I think what we realized
14 at the department is that if you have a
15 pre-accredited program or institution and you have
16 an agency that will not award a full accreditation
17 designation until at least one class has graduated
18 or passed a licensure exam, you put those students
19 in an awful position by allowing them to enroll
20 and take on debt, but then potentially not be able
21 to benefit from a positive decision based on a
22 review of the program while that student was in

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1 it.

2 And if we don't recognize the need for
3 those students to benefit from a positive decision,
4 we will see that you can't start new programs, or
5 we will see that accreditors will no longer be able
6 to wait until the first class graduates. So we
7 have clarified that pre-accreditation is an
8 accredited status. That is currently how we treat
9 pre-accreditation. We do allow pre-accredited
10 institutions to participate in Title IV and, by
11 golly, if we're going to let the student take the
12 loan, they have got to be able to benefit from the
13 positive decision.

14 If there's a negative decision, then
15 those students would have been in an accredited
16 status while they took those classes, but if the
17 institution or program does not receive
18 accreditation, then it ends there and the student
19 is notified that the program or institution is not
20 in an accredited status and Title IV eligibility
21 is lost, in which case, then, we have a teach-out
22 situation where we have to move the student to a

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1 new program, so we've reaffirmed that.

2 I think those are the big issues.
3 There are some smaller issues that are spread
4 throughout the regulation. Again, this is
5 consensus language. There could be some changes
6 in the final reg, but I wanted to at least share
7 what was in consensus language.

8 Then the last thing I wanted to let
9 everybody know about is that we have revised the
10 guidebook, handbook, whatever you call it. We had
11 the 88-page handbook/guidebook. We were hearing
12 from accreditors that it was not helpful. Our own
13 staff were telling us that it wasn't useful to them,
14 either. And so what we've done is we have created
15 a new guidebook/handbook.

16 We call it the handbook. Some people
17 call it the guidebook. Instead of 88 pages, I
18 think it's 23 or 24. And embedded in this is each
19 one of the regs. A lot of the page space here is
20 repeating what the reg is. Basically, what we've
21 tried to do is we've tried to be much more clear,
22 using a table, what needs to be included in the

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1 petition, the idea that we need to move from 60,000
2 pages, maybe, down to 250.

3 We think that people can actually study
4 the 250 pages better than the 60,000. When I look
5 at a 60,000-page application, I see a lack of
6 clarity on our part of letting people know what
7 is it that we want to see.

8 So we think the department needs to be
9 clear. This is what we want to see, and this is
10 how we're going to evaluate it. We are moving
11 toward that approach with this guidebook, which
12 is voluntary. Nobody has to move to the new
13 guidebook or the new format. We are trying this
14 out so that when we implement our new regulations,
15 we will have already tested this format and gotten
16 feedback on it.

17 Then finally, what you'll see when you
18 look at this guidebook, there was an Inspector
19 General report that said that the department needed
20 to do more to not allow agencies to cherry pick
21 among their institutions in their petitions, but
22 we needed to go out and do more de novo review,

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1 based on the challenges we were seeing.

2 And so we've now divided the process
3 into a petition, the paper that is submitted,
4 versus a site visit to the accreditors' offices,
5 where we can randomly look at institutional files.

6 And although the Inspector General would like us
7 to look at more institutions, we know that there's
8 not the capacity to look at 100 institutions and
9 do a complete review of every material.

10 But we have a pretty good sense, based
11 on our dashboards, of where the trouble spots are.

12 And we think our staff can go into an accreditor's
13 office, say I want to see this section of the last
14 self-study of this institution and to do spot
15 checks, so that there is a more comprehensive
16 review, not cherry picked, so we have outlined
17 that.

18 Again, this is voluntary. Nobody has
19 to use it now. We will move to a -- this format
20 will be what we use for our new regs, but in the
21 next, whatever, year and a half, two years, as we're
22 doing this transition, people can choose to come

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1 in under this guidebook, or they can choose to come
2 back to us under the 88-page book.

3 So that's what we've been up to lately.

4 I don't know if I have time for questions. We've
5 been busy. You've been busy. There's a lot going
6 on. A new academic year in traditional calendars
7 is about ready to begin, and I think there's a lot
8 of excitement about what's in store for the future.

9 So I'm happy to take questions.

10 CHAIR KEISER: Jill, you have a
11 question?

12 MS. DERBY: I'm curious about if
13 pre-accreditation is accreditation, why is there
14 a pre-accreditation?

15 MS. JONES: That's a really good
16 question. There is a pre-accreditation because
17 for some accreditors, and in particular some
18 programmatic accreditors, they don't want to make
19 a final accreditation decision until the first
20 class graduates and takes licensing exams. So
21 they want to be able to watch an entire cohort
22 graduate, pass licensure exams, and go into their

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1 field.

2 And so you need to have a way for the
3 accreditor to signal we've actually made a positive
4 decision. We've reviewed this program or
5 institution. We think it's great; but we need to
6 do one last check. So pre-accreditation is a
7 status available to institutions that have proven
8 themselves likely to be accredited, but it gives
9 the accreditor a little more time to watch an entire
10 class graduate.

11 The other option would be to say that
12 an accreditor would have to make a decision before
13 enrolling the first student. And we just think
14 that boxes accreditors in.

15 We want to give accreditors
16 flexibility, but if you're going to give that
17 flexibility, you have to protect the student who
18 enrolls during that period of time, or else no
19 student would enroll, right? You'd have this
20 catch-22. So pre-accreditation is a tool
21 available. Not all accreditors use it. Not all
22 institutions are eligible for it. But among

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1 programs and institutions that are, we want to make
2 it clear that because you can take loans and get
3 Pell grants during that time, those credits will
4 be considered to be from an accredited institution,
5 but if full accreditation isn't awarded, then it
6 stops there.

7 CHAIR KEISER: Simon.

8 MR. BOEHME: Great. Thank you so much
9 for joining us this morning. I have a question
10 about the handbook. I'm curious what the
11 department is doing to incorporate evidence in its
12 review of on-site and how, particularly, that
13 information ensures NACIQI can conduct an
14 independent evaluation, including the criteria
15 where the department believes an accreditor is
16 compliant, but whereas NACIQI may not necessarily
17 agree.

18 I think the handbook does a great job
19 of being transparent in some areas, and also by
20 reducing the workload, but I think when, again,
21 we come to this common place and some information
22 is revealed, because the department has found

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1 something compliant, that information won't
2 necessarily come to NACIQI.

3 MS. JONES: So the staff will have to
4 write in their final report what their finding was,
5 what they based their finding on, whether they
6 captured documents by using their phone or printing
7 it out.

8 So instead of having a full self-study,
9 for example, if what the staff did is they looked
10 at, I don't know, faculty governance of a
11 self-study, if that's the part they evaluated, they
12 will have to capture it, either by printing
13 documents, photographing, or having detailed notes
14 about what they found.

15 So you will still have access to the
16 evidence upon which they base their decision, and
17 then you can review the evidence and come to a
18 different conclusion. So it's not as though there
19 will be no record of that visit; it's just that
20 the staff will record what they've looked at, as
21 opposed to an agency sending us tens of thousands
22 of pages, hoping that something in there is what

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1 we wanted to see.

2 MR. BOEHME: Thank you.

3 CHAIR KEISER: Anne.

4 MS. NEAL: Diane, good to see you.

5 Thank you so much, and thank you for your focus
6 on student learning and a safe zone for innovation.

7 I know you all looked particularly into the
8 intrusiveness of accreditors into religious
9 liberty, and it's something that you addressed.

10 I wondered how you might also be considering
11 addressing the overreach of accreditors in areas
12 relating to state law.

13 Just recently, for instance, we've seen
14 SACS going after the Board of Trustees at the
15 University of South Carolina because it and the
16 governor chose a particular president that it did
17 not care for.

18 We've seen that in other places, where
19 Northwest takes a second look at what the
20 legislature is doing, in terms of its
21 appropriations. How will you all attempt to
22 address that kind of overreach?

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1 MS. JONES: So I have to say that we
2 don't have anything specifically in the consensus
3 language that looks specifically at state law.
4 But what I will say is that if you look at the
5 consensus language, we've made it clear that while
6 there is one kind of governance that has been sort
7 of the gold standard in higher education, we've
8 recognized that there are different kinds of
9 governance arrangements.

10 So I would say that the interaction
11 between a school and the state legislature really
12 would fall under governance. We haven't dictated
13 what those standards should be, but we do think
14 that there are -- there's more than one way to skin
15 this cat, essentially.

16 We do think there could be a variety
17 of governance models, even within a single
18 institution, where some programs might be subject
19 to a different model than others. So we haven't
20 specifically commented on state legislature, but
21 I do believe that's one of the things accreditors
22 would look at in the context of governance.

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1 MS. NEAL: So you're saying that when
2 accreditors are dealing with trustees and second
3 guessing their efforts, that is not something
4 you'll address?

5 MS. JONES: We didn't address it in our
6 regulations. Whether or not we would intervene
7 to try to say is the accreditor adhering to their
8 own standards in their review, potentially, but
9 no, we don't have anything in the consensus
10 language.

11 And I'm looking at Lynn Mahaffie. I
12 don't recall seeing a comment about that issue in
13 the public comments. I read them over the weekend,
14 and, I have to tell you, I might not remember every
15 one, but I don't think that has come to us in public
16 comments. So I think that's a good issue for us
17 to discuss. I don't have a good answer for you
18 today, other than that we've looked at governance.

19 Let us take that back and have a
20 conversation. Again, I think we want to be clear.

21 We no longer think the department should impose
22 one-size-fits-all standards on accreditors.

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1 So I think we want to be careful how
2 we intervene and when we intervene, but certainly,
3 we think that there are different kinds of
4 governance models, and certainly different
5 institutions are under different kinds of
6 requirements by their state legislature. But let
7 us take that back and dig into it a little bit
8 further, so that we can come back to you with a
9 more specific answer.

10 CHAIR KEISER: Simon.

11 MR. BOEHME: Just one more question.

12 In 2018, the department restored ACICS's
13 recognition. What's the timeline for them coming
14 before NACIQI or just if you can walk me through
15 what the department is thinking, when they'll be
16 up next and that?

17 MS. JONES: So I think I have the dates
18 right, but I'm going to look at my colleagues there
19 to make sure. So I think, because the
20 re-recognition was 2016, that their five years will
21 be five years from 2016, so they are already well
22 into that five years.

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1 Am I correct so far? Okay. They do
2 have a compliance report that's coming up. They
3 do have some monitoring reports that are due. So
4 those will be due to the staff. The staff will
5 review them. I can't remember which month in 2016.

6 I think it was December 2016, so maybe that means
7 it's -- November. So Herman's saying November.

8 So they are well into their five years, and they
9 will be up for re-recognition.

10 MR. BOEHME: Thank you.

11 CHAIR KEISER: Do you have time for two
12 more?

13 MS. JONES: Sure.

14 CHAIR KEISER: Two more questions,
15 Ralph and then Rick.

16 MR. WOLFF: Thank you. As I recall,
17 you said -- I'm going to go back to the handbook
18 and the site visit -- that it's going to be optional
19 for accrediting agencies initially. Two points
20 or questions. One is I hope that there'll be an
21 opportunity for us all, the agencies, the
22 department, and NACIQI to assess how well the site

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1 visit works and the new handbook.

2 As I understand it, in the past, there
3 would be a site visit to visit the commission
4 meeting and occasionally go on a visit. Now we're
5 saying that the staff will also go to the office,
6 which is typically a different place than where
7 the commission meeting is, and always a different
8 place than a site visit.

9 So will there be three visits or -- in
10 other words, is there any sense of how much time
11 or how this is actually going to be structured in
12 the timeline, and where would it occur? Because
13 we're going to get the documents earlier, you said,
14 which is -- rather than seven days, much
15 appreciated.

16 MS. JONES: Right, we want to make sure
17 you have 30 days to review documents --

18 (Simultaneous speaking.)

19 MR. WOLFF: So I'm just trying to think
20 how this is all going to work with a site visit,
21 a report, the opportunity to respond. Is there
22 going to be three site visits, one for the team

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1 visit, one for the commission meeting, and then
2 one to actually look at files in the office? I'm
3 just trying to think it through.

4 MS. JONES: It could be two, right?
5 So there are some agencies that have their
6 commission meeting at their offices, in which case
7 you could combine the two, or if it's in the same
8 city, maybe you would do both in the same week.

9 So you could potentially have three separate
10 visits, or you could combine.

11 The other thing we're doing is
12 we're -- and you'll see this in the new
13 regulations -- is it's a longer process. So we
14 need information much further in advance about
15 which programs or institutions are under review
16 by the agency because the idea is that we actually
17 want staff to be able to follow a complete decision.

18 We want staff to be able to participate
19 in the site visit, participate in the commission's
20 decision-making meeting. Because right now what
21 happens is we can see pieces of different
22 processes, but we don't have the time to follow

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1 a single institution all the way through. Under
2 the new timeline, we will have time to actually
3 follow a decision from start to finish to see how
4 the whole cycle runs with an agency. So it is a
5 longer period of time.

6 The other idea is that the manuals, so
7 to speak, the manuals that an agency has would be
8 submitted to the department much earlier in
9 advance, so that if there is a policy problem, we
10 can work with the agency to say you need to correct
11 this, and you need to do it quickly because we need
12 to be able to see you implementing the new policy
13 when we come to do our visit.

14 The reason this is voluntary is that
15 we have agencies that are already in the process
16 of pulling their 60,000 pages together, and we
17 didn't want to be disruptive.

18 If they're doing what they're doing,
19 they can keep doing it, but as other agencies are
20 coming in, or maybe they haven't gotten that far
21 and they want to give this a try, so we're allowing
22 institutions -- I'm sorry, agencies under this

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1 handbook to pick this handbook or the 88-page
2 handbook that they wish to come in under. We
3 shared this with a number of accreditors to get
4 feedback. There are no policy changes in this,
5 other than the fact that we're dividing up the
6 petition from a site visit. That's not really a
7 policy change; that's a process change.

8 When we have the new regulations in
9 place, then we'll update policies in this book.

10 So yeah, I mean, look, it's going to be a lot more
11 work on staff. It's probably going to be more work
12 on agencies. We've tried to expand the team.
13 We've tried to add a few more positions. We need
14 more people to do the work.

15 We've tried to shift travel budget
16 within OPE because we know that it's going to cost
17 more. But I think we also have the fundamental
18 belief that -- when our staff go to an agency's
19 offices, it becomes pretty clear, pretty quickly,
20 whether it's a well-run organization where
21 everybody who works there understands the policies
22 and procedures.

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1 And it also, like I said, addresses the
2 Inspector General's concern that agencies were
3 cherry picking their best and submitting them, and
4 we were only looking at the best. And we need to
5 look at the full range, so we did have to address
6 the Inspector General's concerns.

7 So is this a perfect process? Probably
8 not. Will we learn as we implement it?
9 Absolutely. Will we find that some things maybe
10 have to shift? You bet. But we felt like if we
11 could have a very carefully constructed list of
12 requirements for a petition, make sure you get it
13 30 days in advance to really see what you need in
14 the petition, as well as in the supplemental site
15 visit documents. Sometimes less is more because
16 you have less of an opportunity to bury things when
17 you have 200 pages versus 60,000.

18 CHAIR KEISER: Rick, and then we'll
19 finish with Paul.

20 MR. O'DONNELL: Diane, thank you for
21 being here. I'm curious, for the on-ramps for new
22 accreditors, are you hoping -- what are you hoping

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1 that spurs? Are there certain types of
2 accreditors or innovation you're hoping that the
3 on-ramps foster?

4 MS. JONES: I don't think we have a
5 particular hope one way or the other. I don't
6 think we have a hope -- I don't know that we
7 necessarily need new accreditors, but I do know
8 that we hear from outside organizations that
9 they're stuck because they're in this catch-22 of
10 if they come in accrediting only a new institution,
11 then people are going to say well, you must not
12 be very good, you can only accredit institutions
13 that nobody's accredited before. And if they try
14 to accredit an existing institution, who's going
15 to do that?

16 We used to allow dual accreditation.
17 The consensus language allows dual accreditation
18 again because you may want accreditation based on
19 an accreditor that has lots of other campuses in
20 your geographic area, but then you may also want
21 an accreditor because of a particular mission.

22 And so we are also, then,

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1 re-introducing the concept of where it makes sense,
2 and it's not just to dodge a negative
3 decision -- where it makes sense, for legitimate
4 reasons, you could have dual accreditation.

5 I don't know that we think there's going
6 to be an onslaught of new accreditors. I don't
7 know that we want that, but we do see the chicken
8 and egg problem, and we felt like we needed to
9 address it. What I've heard from accreditors that
10 already exist is that they're looking at the
11 consensus language as an opportunity for them to
12 be thinking about new ways of looking at schools.

13 So I don't know that we're going to see new
14 accreditors or different accreditors, but we did
15 need to address that chicken and egg phenomenon,
16 and it was addressed in the consensus language.

17 CHAIR KEISER: Paul.

18 MR. LEBLANC: Diane, thanks for taking
19 time with us. Can you clarify something for me
20 in the new handbook? One of the daunting
21 challenges for institutions, and thus, by
22 extension, accreditors, is the ability to get good

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1 data on income, job placement.

2 A lot of that is self-reported. Can
3 you clarify what will and will not be permitted
4 in the new handbook, in terms of how we look at
5 those pretty critical student outcomes?

6 MS. JONES: So the new handbook does
7 not change anything about the way we look at student
8 outcomes. The consensus language did address this
9 issue of job placement rates. We actually think
10 it's very dangerous territory for schools to be
11 reporting job placement rates, and we think it's
12 a very expensive undertaking. And we all know that
13 self-reported data has pretty big error bars. And
14 so we are expanding the College Scorecard to
15 provide program-level earnings for every program.

16 We know the shortcoming there is that it doesn't
17 currently list all the employers, although we're
18 having conversations with others. How might we
19 be able to at least integrate a list of top
20 employers? No commitments are being made.

21 We're looking at it. We think that
22 when schools use the College Scorecard data, it's

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1 government produced data. Sure, people lie on
2 their taxes, so IRS data is only as accurate as
3 it is, but I think people lie less on their taxes
4 than they do when somebody calls them from a number
5 they don't know and says what do you do for a living?

6 So obviously, accreditors can have job
7 placement rates, can continue to do that. Schools
8 that advertise them are going to have to be able
9 to provide the data to support them.

10 But I think what we're encouraging is
11 that we believe that the program-level student
12 scorecard provides administrative data at no cost
13 to the institution, and it's a level playing field
14 because those data are available for every program,
15 at every institution. So in the future, and in
16 our consensus language, I think you've seen that
17 we've pointed to that. But this handbook doesn't
18 change the current regs, but I do think it
19 re-emphasizes that if you're going to publish a
20 job placement rate, you had better have the data
21 to back it up.

22 MR. LEBLANC: Thank you.

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1 CHAIR KEISER: Thank you, Diane. That
2 was a wonderful report. First of all, I just
3 commend you. I didn't think, in my lifetime, I
4 would ever see a negotiated rulemaking committee
5 come to consensus. I just thought that was
6 impossible. Your leadership helped that happen,
7 so thank you very much.

8 MS. JONES: Thanks to all the
9 negotiators who participated, and thanks to all
10 of you for your work.

11 CHAIR KEISER: Thank you. It's my
12 pleasure now to have our staff introduce themselves
13 to you. Chuck, you're the one all the way at the
14 end. I'll let you start.

15 MR. MULA: Chuck Mula, department
16 staff.

17 MS. LEFOR: Valerie Lefor, department
18 staff.

19 MS. HELTON: Charity Helton,
20 department staff.

21 MS. DAGGETT: Elizabeth Daggett,
22 department staff.

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1 MS. MCKISSIC: Stephanie McKissic,
2 department staff.

3 DR. HARRIS: Dr. Nicole S. Harris,
4 department staff.

5 MS. HONG: We actually have some summer
6 interns that have been really instrumental in
7 helping us get this meeting off the ground, so I'm
8 going to have them introduce themselves and what
9 institution you're coming from.

10 MS. ONG: Madeline Ong. I'm a recent
11 graduate from UC Davis, in California.

12 MS. HINH: Iris Hinh. I'll be a rising
13 senior at UCLA.

14 CHAIR KEISER: Welcome. We'll get
15 started on the agenda. The first part of our
16 agenda is the consent agenda, and I'd like to go
17 over what will occur. We have currently three
18 institutions that will be under the consent agenda.

19 For those who are institutional agencies, the
20 reason you're not on it is the consent agenda is
21 defined primarily for non-gatekeeper agencies.
22 So I wanted to make sure that people understood

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1 that.

2 So what we'll do first is to call for
3 third-party oral comments. Once we go through the
4 list, call for the removal, by any member of the
5 team, of items from the consent agenda. We will
6 then move and second the consent agenda, and then
7 finally a vote on the consent agenda.

8 The three institutions for the consent
9 agenda, the first one is the Council on
10 Chiropractic Education, which was reviewed by
11 Simon and Kathleen. Are there any third-party
12 commenters? Oh, my, can't believe it. For those
13 who are part of this group, you will know this is
14 a unique situation.

15 The second is the Commission on English
16 Language Program Accreditation, by John Etchemendy
17 and Claude Pressnell. Are there any third-party
18 commenters? Any comments from the team?

19 And the third is the Association for
20 Clinical Pastoral Education. The readers were
21 Jill Derby and Anne Neal. Are there any
22 third-party commenters?

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1 I would entertain a motion to approve
2 the consent agenda.

3 MS. ALIOTO: So moved.

4 MS. JONES: Thank you. I needed
5 somebody, Kathleen. Thank you for standing up.
6 Second?

7 MR. WOLFF: Second.

8 PARTICIPANT: Second.

9 CHAIR KEISER: I've got a lot of
10 seconds. Ralph is the second. Any further
11 discussion? Sensing none, all in favor of the
12 motion to approve the consent agenda say aye.

13 (Chorus of aye.)

14 CHAIR KEISER: Raise your hand. I
15 always do that. Any opposed? Two opposed?
16 Okay, no opposed. Then it wouldn't be consent.
17 Yes, Kathleen.

18 MS. ALIOTO: I would appreciate it, in
19 the future, if the person from the department were
20 listed with all of our -- so that we can thank them.

21 I asked Chuck, in the beginning, do you know who
22 did the chiropractic? He said well I did.

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1 CHAIR KEISER: I'm sorry. It is on the
2 agenda, and I did not read those. Just for the
3 record, Chuck Mula was for the chiropractic
4 education. Also, he was the Commission on English
5 Language Program, and on the third one, Valerie
6 Lefor was for the Association of Clinical Pastoral
7 Education.

8 MS. ALIOTO: Excellent. They did a
9 great job.

10 CHAIR KEISER: Simon.

11 MR. BOEHME: I was wondering if you'd
12 be willing to entertain a motion?

13 CHAIR KEISER: A motion for what?

14 MR. BOEHME: If I can just have one
15 minute, or two minutes, I think, Kathleen, I think
16 you're my --

17 CHAIR KEISER: Would I entertain a
18 motion or discussion?

19 MR. BOEHME: No, I want to ask a
20 question to the committee.

21 CHAIR KEISER: Go ahead. My pleasure
22 to have you ask questions.

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1 MR. BOEHME: Thank you, and thank you
2 for entertaining me, as this is my last meeting.

3 So pretty soon, I won't be causing as much trouble.

4 Currently, 34 CFR 602.33 says the Education
5 Department staff can review an accrediting
6 agency's compliance with the criteria at any time,
7 mid-recognition review at the request of NACIQI
8 or based on information. The exact language of
9 this is 602.33, Procedures for Review of Agencies
10 During the Period of Recognition.

11 There are two options, at the request
12 of the advisory committee, or two, based on any
13 information that, as determined by department
14 staff, appears credible and raises issues relevant
15 to recognition.

16 I would like to make a motion that
17 NACIQI should vote to request the department
18 initiates a mid-year recognition period review of
19 ACICS, particularly with respect to 34 CFR 602.15,
20 Administrative and Fiscal Responsibilities. This
21 provision requires that accreditors have adequate
22 administrative staff and the financial resources

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1 to carry out its accrediting responsibilities.

2 If the chair permits me, I can go into
3 greater explanation why I believe we should have
4 this motion, or I can table this motion for later.

5 I understand we have a packed agenda.

6 CHAIR KEISER: We do, but if there's
7 a second -- if there's no second, we won't discuss
8 it. There's a second by Kathleen. Okay, Herman,
9 you have something you want to say?

10 MR. BOUNDS: I just wanted to inform
11 the committee that we've already done that. We
12 sent a letter to ACICS to explain some of their
13 financial -- to explain their financial
14 information, with some other things. So we're
15 waiting for a response back, and we'd be happy to
16 share that with NACIQI once we get that information
17 back from ACICS. And we did that under 602.33.

18 CHAIR KEISER: Ralph.

19 MR. WOLFF: Herman, Diane just
20 mentioned that there is also a compliance report
21 due. Will we see that, or how -- what will be the
22 process of -- if you could give us a timeline for

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1 review, given the issues involved there.

2 MR. BOUNDS: So the compliance report,
3 it's in regulation. So the compliance report is
4 due, I believe, to us, on November 19th. So that's
5 going to come in as any other normal compliance
6 report, and that compliance report will follow the
7 process. NACIQI will review. We'll make a
8 recommendation. You guys will make a
9 recommendation, and then that will go to the SDO.
10 There's also a monitoring report that we
11 also -- that was also part of the Secretary's
12 decision on ACICS. We'll get that information in;
13 we'll review it; and that information will also
14 be made public for folks to see.

15 CHAIR KEISER: Does that satisfy you?

16 MR. BOEHME: Thank you, Herman, for
17 that clarification, and it does. So long as NACIQI
18 sees that report, that's certainly sufficient, so
19 thank you.

20 CHAIR KEISER: Will you withdraw your
21 motion?

22 MR. BOEHME: I withdraw my motion,

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1 thank you.

2 CHAIR KEISER: Thank you. Solves that
3 problem. Okay, what we'll do is now go into our
4 standard review process. If I may, I'll go down
5 the way our process operates. We have primary
6 readers who are assigned to each agency.

7 The primary readers introduce the
8 agency's application. From that point, the
9 department staff provides a briefing based on their
10 findings, at which point the agency representative
11 provides comments or responds to the findings of
12 the staff. The primary readers then begin the
13 process of asking questions of the agency,
14 including, potentially, the standard questions
15 adopted by NACIQI for initial and renewal
16 applications. Questions by NACIQI, the rest of
17 the committee, is followed by a response and a
18 comment from the agency.

19 There'll be third-party comments, if
20 there are any that are signed up at this point,
21 or that have requested in advance to appear. The
22 agency then has the opportunity to respond to the

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1 third-party comments. The department staff then
2 responds to the agency and the third-party
3 comments.

4 The committee will then have a
5 discussion and vote on the agency's application.

6 Then, potentially, a final set of standard
7 questions on improving instruction, program
8 quality for initial and renewal applications.

9 Are there any questions? Everybody
10 comfortable with our process?

11 Hearing none, we'll move to the renewal
12 and recognition of the expansion and scope of the
13 Western Association of Schools and Colleges,
14 Accrediting Commission for Community and Junior
15 Colleges. The primary readers are Claude and
16 Federico. Department staff is Elizabeth Daggett.

17 RENEWAL OF RECOGNITION AND EXPANSION OF SCOPE,
18 WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES,
19 ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR
20 COLLEGES

21 MR. ZARAGOZA: The Western Association
22 of Schools and Colleges, Accrediting Commission

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1 for Community and Junior Colleges, WASC ACCJC,
2 hereafter referred to as the agency, is an
3 institutional accreditor. The agency's
4 institutions are voluntary members that offer
5 two-year educational programs and award
6 associate's degrees.

7 The institutions include community
8 colleges, private religious institutions,
9 for-profit and independent non-profit vocational
10 institutions, as well as independent junior
11 colleges. The agency has approximately 130
12 accredited member institutions.

13 The member institutions are located in
14 California, Hawaii, the U.S. territories of Guam
15 and American Samoa, the Republic of Palau, the
16 Federal States of Micronesia, the Republic of
17 Marshall Islands. The majority of the agency's
18 member institutions offer at least some courses
19 via distance education. The agency was first
20 recognized in 1952 by the U.S. Commission of
21 Education. Since that time, the agency has been
22 periodically reviewed and has been granted

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1 continued recognition.

2 The most recent recognition was granted
3 in 2017. The agency's recognition enables its
4 institutions to establish eligibility to receive
5 funding under Title IV of the Higher Education Act
6 of 1965, as amended. There are two petitions
7 related to this agenda item.

8 One is a petition for continued
9 recognition and a second request to expand the
10 agency's scope of recognition. The agency is
11 currently recognized for its accreditation and
12 pre-accreditation of its member institutions, with
13 a primary mission of granting pre-bachelor
14 degrees, allowing them to offer certificates,
15 associate degrees, and first bachelor degrees, by
16 means of substantive change review offered by
17 institutions that are already accredited by the
18 agency and such programs offered via distance
19 education and correspondence education at these
20 colleges. This recognition also extends to the
21 committee on substantive change of the commission
22 for decisions on substantial changes and for the

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1 appeals panel. The agency's requesting an
2 expansion of its current scope to include the
3 pre-accreditation and accreditation of
4 institutions that may offer bachelor's level
5 degree programs.

6 Three written third-party comments
7 were received regarding this agency. All of the
8 comments reflected positive views regarding the
9 agency, and the commenters are members of the
10 faculty or staff of California Community Colleges.

11 Mr. Chairman, at this time, I will defer to the
12 department staff for their comment analysis and
13 recommendations related to the agency request.

14 MS. DAGGETT: Good morning, Mr. Chair
15 and members of the committee. For the record, my
16 name is Elizabeth Daggett, and I am providing a
17 summary of the review of the petition for renewal
18 of recognition and request for an expansion of
19 scope for the agency, which is the Western
20 Association of Schools and Colleges, Accrediting
21 Commission of Community and Junior Colleges, or
22 ACCJC. ACCJC was scheduled to appear before

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1 NACIQI at its winter 2019 meeting, which was to
2 be held on February 5, 2019. However, due to the
3 lapse in appropriations, the meeting was canceled.

4 Department staff completed the review of the
5 agency's petition for recognition and provided the
6 agency with a draft staff analysis.

7 The agency was given the required
8 response time. Department staff provided the
9 agency with a final report and made that report
10 available to the public. In addition, third-party
11 comments were requested, reviewed, and analyzed
12 as part of department staff's review of the
13 agency's petition for recognition in preparation
14 for the winter 2019 meeting.

15 The staff recommendation to the senior
16 department official for this agency is to renew
17 the agency's recognition for a period of five years
18 and approve the agency's request for an expansion
19 of scope.

20 This recommendation is based on our
21 review of the agency's petition, its supporting
22 documentation, and its request for an expansion

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1 of scope, as well as the observation of a commission
2 meeting in June of 2018 and a site visit in October
3 of 2018 to an institution that offers a
4 baccalaureate degree program. The department
5 also received three third-party comments that all
6 reflected positive opinions of the agency. Our
7 review of the agency's petition found that the
8 agency's in compliance with the secretary's
9 criteria for recognition.

10 With regard to the expansion of scope,
11 the agency requested an expansion to include the
12 pre-accreditation and accreditation of
13 institutions that offer baccalaureate level degree
14 programs.

15 The agency provided information and
16 documentation to support its request and to
17 demonstrate that it has a consistent, regular, and
18 thorough process for the review and approval of
19 baccalaureate degree programs. The agency also
20 provided its policies, procedures, and standards
21 related to baccalaureate degree programs.

22 In addition, the agency provided

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1 documentation of implementation of those policies,
2 procedures, and standards. As stated earlier,
3 department staff observed the site visit, which
4 demonstrated that the policies and practices used
5 by the agency related to the review of
6 baccalaureate degree programs are effective and
7 comprehensive. Since the agency's last review in
8 February of 2017, the department has received no
9 complaints.

10 Therefore, as I stated earlier, the
11 staff is recommending to the senior department
12 official to renew the agency's recognition for a
13 period of five years and approve the agency's
14 request for an expansion of scope. Thank you.

15 CHAIR KEISER: Thanks. Are there any
16 questions to the staff? Thank you, Elizabeth.
17 Will the members of the agency please come forward
18 and introduce yourselves? I will say this is a
19 lot quieter than it was last time.

20 DR. WALTON: Good morning, Chair
21 Keiser, NACIQI members, department colleagues,
22 primary readers. My name is Ian Walton. In my

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1 past life, I taught mathematics at Mission
2 Community College, located in the heart of Silicon
3 Valley, for 33 years.

4 I've served as a public commissioner
5 for ACCJC since 2013, and I'm currently the chair
6 of the commission. Thank you for taking the time
7 to talk with us today. I'd like to introduce my
8 colleagues at the table with me. On my left, your
9 right, the vice chair of the commission. This is
10 Sonya Christian. She's the president of
11 Bakersfield College, in California. On my far
12 right, your left, we have the secretary/treasurer
13 of our commission. Mary Okada is the president
14 of Guam Community College.

15 From our offices in Nevada, on the
16 right, I have Stephanie Droker, the senior vice
17 president of ACCJC and beside me, Richard Winn,
18 the president of ACCJC. We all appreciate the
19 thoughtful, thorough work of the U.S. DE staff in
20 reviewing our extensive submissions -- I'm not sure
21 how many thousands of pages -- and forwarding a
22 positive recommendation to your panel.

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1 In the months since our last appearance
2 here, in January 2017, dramatic improvements have
3 taken place at ACCJC, to the benefit of our member
4 institutions and, more importantly, to the benefit
5 of our students. We have an active, engaged,
6 informed commission, charting new directions in
7 an adopted strategic plan. We have a new model
8 for working with our member institutions, the
9 portfolio model that's used by some of our follow
10 agencies. We have new senior leadership, which
11 has created a very different spirit and philosophy
12 from what some of you have seen before. We have
13 new approaches to training, in general, to fiscal
14 monitoring of our institutions, and to our team
15 orientation process.

16 We found significant ways to reduce the
17 institutional burden. This has resulted in
18 increased effectiveness of the engagement with our
19 member colleges. As a result, we have greatly
20 increased support from our member colleges.

21 For example, we just recently had 500
22 participants at our recent conference, with a 98.8

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1 percent positive evaluation rate. We've had many
2 informal comments of appreciation for the changes
3 that have taken place, and we have eager
4 anticipation of continuing innovation, for
5 example, a two-stage review model.

6 Finally, for me, on a personal note,
7 for those of you with long memories, in 2015, I
8 told you that our commissioners were determined
9 to change the culture at ACCJC, to improve the
10 experience for both our member colleges and their
11 students. I think some of you were surprised,
12 then, to hear a faculty member say that in this
13 very room, but I'm delighted to tell you we've done
14 exactly that, and we'll all be happy to answer
15 questions, but right now, President Winn is going
16 to respond to your standard questions. Thank you.

17 DR. WINN: I don't know if you would
18 prefer to proffer the questions, and then we
19 respond, or we have actually copied the questions
20 out of the public register and have some comments
21 regarding each of them, so I'll defer to the
22 readers.

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1 CHAIR KEISER: No, go ahead. It would
2 be fine if you want to work your way through.

3 DR. WINN: Great. One of the
4 questions, of course, is what have been the actions
5 that we have taken since our last review. We want
6 to make sure that we're not perceived as giving
7 everybody a free pass.

8 I just comment that since 2014, we have
9 taken actions referred to as sanctions for a total
10 of 29 semesters on our member institutions. Those
11 have been in areas of, in descending order,
12 concerning planning, board concerns, fiscal
13 stability, program review, and internal
14 governance. We've taken, as I'm sure all of you
15 know, one adverse action on City College of San
16 Francisco, which was then returned to restored
17 status in 2016. At this moment in time, none of
18 our institutions are on sanction, which we think
19 is a testimony to the notion that carrots work
20 better than sticks.

21 We've been doing a great deal of work
22 in terms of conferences, training, workshops,

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1 raising the level of awareness of the value of our
2 standards, and helping institutions understand
3 what they need to do to bring them into compliance.

4 You've asked about the kinds of data
5 that we use to lead to the conclusions that we make,
6 quite a lengthy list, including head counts,
7 degrees that are awarded. We publish for our
8 commission, an annual report that summarizes all
9 of these data.

10 We specifically, then, look at degrees
11 that are awarded, certificates, transfers. In our
12 sector, transfers are really important. For
13 example, in the California public sector, which
14 is the vast majority of our institutions, 69
15 percent of those who move on to a four-year
16 institution do so without acquiring an associate
17 degree on the way. Adding in the transfer rates
18 has significantly clarified the degree to which
19 our institutions are succeeding in serving their
20 students. We even go down to the level of course
21 completions and licensure pass rates. We monitor
22 this very carefully.

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1 You've asked about the success with
2 respect to student achievement. We're using a
3 very interesting approach that I'm going to ask
4 our senior vice president, Stephanie Droker, to
5 explain, that asks institutions specifically to
6 document and set standards on a three-year
7 timeline.

8 DR. DROKER: Good morning. With
9 regards to student achievement, we actually
10 continue to watch these trends throughout the
11 comprehensive review process. It doesn't just
12 happen once in a cycle of reaffirmation, but it
13 actually happens every year.

14 The college is required to write -- we
15 have standards on student achievement, and they
16 are required to write and address with evidence,
17 and the team verifies that information. Then, on
18 an annual report, they give us a three-year trend.

19 We do watch that. There's no exception to this.

20 With every one of our institutions, we've seen
21 an uptake in their institutions set standards as
22 related to student achievement. We're really

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1 proud of that. The colleges are doing amazing
2 work.

3 We also ask them, in the comprehensive
4 review, to write about their plans on moving the
5 needle on student learning and student
6 achievement. We call it the quality focus essay.

7 They are to provide a timeline and, basically,
8 it's a project management tool. Then at the
9 midterm level, when they come back with another
10 report, they're to give us an update on those plans.

11 We look at student achievement and
12 institution-set standards as a weaving of
13 information that the institution provides so that
14 we can not only encourage improvement, but we also
15 really put the emphasis on the institutions' focus
16 on their own continuous quality improvement,
17 which, of course, is student learning and student
18 achievement.

19 DR. WINN: You've also appropriately
20 asked why did we choose this strategy? Why did
21 we put the responsibility on the institution to
22 analyze its context, its program mix, its

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1 demographic history, and say you tell us what you
2 believe are appropriate standards for achievement
3 under each of these multiple categories?

4 We've done this because it's adaptable
5 to the unique character of each institution. Even
6 though we're the only agency that accredits only
7 community colleges, there's enormous diversity in
8 that sector, from the large inner city to the
9 remote, up in Mendocino County. We don't want to
10 do a one size fits all.

11 We say you know your context the best.
12 You tell us what's realistic. Perhaps just as
13 important, this places the locus of accountability
14 on the institution. When they do their own
15 analysis as to how well they're achieving their
16 multiple student achievement goals, they are in
17 the best position to understand what steps they
18 need to take to be able to move forward.

19 Also, we would note that in all of the
20 major systems that we work with -- for example,
21 85 percent of our institutions are in the
22 California public sector. There are huge state

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1 funded initiatives that are in place to encourage
2 and improve student achievement. We're by no
3 means the only player in town. Part of our job
4 is to give an opportunity for the institutions to
5 document how well those multiple initiatives are
6 working and incorporate those outcomes into their
7 stated goals.

8 A final question that you've been
9 asking, very important, what are the student
10 achievement challenges that the institutions are
11 facing? Part of it is, as you know, our membership
12 are all open access institutions.

13 As a result, we are working with
14 part-time students, working adults, people who
15 have difficulty enrolling in enough units to
16 qualify for Title IV, diverse educational goals.

17 Not all of them desire a degree. Some of them
18 only desire a single course, in order to move
19 forward in their careers.

20 We deal with many under-prepared
21 students from high schools, often with long
22 intervals since their high school experience.

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1 Many of them, as you can imagine, require
2 remediation. We're rather eager to see that the
3 performance metrics that are used to appreciate
4 and honor the work of our students reflect that
5 enormous diversity and unique student
6 characteristics.

7 We realize that, for example, the
8 national average for achieving an associate degree
9 is 5.7 years. The three-year timeline often
10 doesn't accurately tell the story of our students.

11 With that brief summary, we'll be glad to respond
12 to any questions that you may have.

13 MR. PRESSNELL: First of all, thank you
14 all for coming, appreciate it very much, you being
15 here, and appreciate your report, as well. I had
16 a question. I've got a couple of questions. One
17 is about your expansion of scope moving toward
18 approving the baccalaureate degrees.

19 Can you talk more about that? I know
20 this has been kind of a long time coming. I looked
21 at the history of recognition and so forth. Talk
22 a little bit about that and the process, and also

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1 types of degrees that you see there.

2 DR. WINN: There's a unique historical
3 piece to that. For many, many years, there was
4 an informal relationship between the two WASC
5 commissions -- and Ralph can speak to this -- where
6 the -- our agency would accredit the associate
7 degrees and, if an institution wanted to accredit
8 a bachelor's degree -- offer a bachelor's degree,
9 that would be accredited by the senior commission.

10 The Office of the Inspector General said no, you
11 can't do that.

12 That gives you two Title IV
13 gatekeepers. That's not allowed. We were
14 partway into reviewing a bachelor's degree for
15 American Samoa, so the department worked out a
16 compromise where they would allow us to recognize
17 one bachelor's degree, but we clearly needed to
18 clean up our act and refine the process for doing
19 that.

20 Over the next several years, we really
21 refined and honed our ability to accredit
22 bachelor's degrees, to the point where we would

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1 not be limited to just the first one, which was
2 kind of a negotiated temporary interim compromise.

3 The bachelor's degrees that are
4 offered, typically, at a community college are
5 technically oriented. They are -- again, in
6 California, it's a matter of staking out territory
7 with the CSU system, so that there's no overlap.

8 So they have to be demonstrated as singularly
9 appropriate to the program that that community
10 college can justify within its particular region.

11 The staff has appreciated the processes
12 that we're using, to the point where they're saying
13 we don't need to limit this to just the first
14 baccalaureate. Should the California state
15 legislature approve an institution to offer more
16 than one, we're now ready to serve them.

17 MR. PRESSNELL: Very good. You talked
18 a little bit about the importance of student
19 mobility. As we take a look at your data,
20 definitely, when you add the transfer rate to the
21 graduation rates, your performance levels are far
22 more robust that way. Just curious as to whether

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1 or not you all had explored reverse articulation
2 with the four-year institutions?

3 I know in Tennessee, we do that for
4 those that are early transfers out of the community
5 colleges. It's a partnership with a four-year
6 institution to transcript back to the community
7 college, in order to kind of lock those credits
8 into the associate degree, once they pass that
9 benchmark. Have you looked at that, at all?
10 Obviously, if that would happen, then your grad
11 rates would be more reflective of student success
12 in the long run, but I didn't know if you had
13 considered that.

14 DR. WINN: This is typically an
15 institution level arrangement. Perhaps our
16 president from Bakersfield College could speak to
17 that.

18 MS. CHRISTIAN: The reverse transfer
19 concept is not as robust in California, but it's
20 starting to gain traction like in some other
21 states. I would concur with you. If we were to,
22 in a systematic kind of way, from a state

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1 perspective, take on reverse transfers, our
2 numbers are going to jump pretty rapidly.

3 I know that there are schools,
4 individually, for example, some of the schools in
5 the Los Angeles community college district, and
6 others, are starting the conversation and doing
7 it individually. If I were to predict, I would
8 say probably in the next two years, we would
9 probably see that expanding to systems level
10 solutions with agreements with the CSU systems
11 office with the community college -- the California
12 Community Colleges serve 114 colleges. Right now,
13 that's not happening. It's happening on an
14 individual basis. Thank you.

15 MR. PRESSNELL: I would just encourage
16 you to look at it. Because again, it doesn't
17 artificially inflate. It actually is more
18 reflective of the success of the students. I
19 think, in particular, it assists the students, from
20 a credentialing standpoint.

21 Life happens, and sometimes you do a
22 transfer and you may not end up being able to

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1 complete the baccalaureate, but this would secure
2 those credits, at least at an associate level, so
3 I would encourage you to do that. The other
4 question that I had, then want to open it up to
5 my colleagues -- as with a lot of people, we're
6 all concerned about student debt.

7 You have a very small percentage of your
8 students that are actually participating in the
9 loan programs, but it appears that those who are
10 are defaulting at a pretty high rate. It shows
11 that -- it looks like 42 of the institutions have
12 a cohort default rate in excess of 20 percent.
13 So I'm wondering about -- obviously, you have -- and
14 this is reflective of a typical default situation.

15 It's usually those that have, actually, a pretty
16 small amount of debt, they tend to be
17 non-completers. They're the ones who tend to
18 default for various reasons, everything from they
19 can't secure the employment to pay the debt back,
20 or they feel like somehow, they had a
21 dissatisfied -- they were dissatisfied in their
22 experience, so I'm not going to pay for something

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1 I didn't really get out of it.

2 I am curious. I know it's a small
3 number, but in that small number, it doesn't look
4 really good. How are you addressing that with your
5 member institutions?

6 DR. WINN: There are probably two
7 observations I would make. One is that many of
8 our institutions are now urging special work in
9 financial literacy for their students as a part
10 of taking out loans.

11 Secondly, a number of our community
12 colleges simply do not participate in a loan
13 program, partly because so few students may
14 constitute a loan cohort, where just a few defaults
15 would register a very high percentage number. It
16 would be interesting to dig down into that and see
17 what is the actual number of the defaults. We're
18 encouraging our institutions to really work with
19 their students to understand what it means to take
20 on debt.

21 DR. DROKER: May I speak to that?

22 DR. WINN: Please.

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1 DR. DROKER: Addressing this is also
2 part of this annual fiscal report done annually,
3 as well as with the standards. During the
4 comprehensive review, they need to address their
5 high default rates.

6 MR. ZARAGOZA: I, too, want to commend
7 you for the wonderful progress you've made since
8 2013. It was a very exciting meeting back in 2013.
9 Again, from a community college perspective, I'm
10 very interested in what kind of supplementary data
11 sources you use, other than IPEDS, to look at
12 student success, especially as it relates to
13 non-degree students that may be seeking
14 credentials other than a degree, certificates and
15 the like.

16 DR. DROKER: One of the areas that
17 we've been really interested in is that each -- we
18 have systems that are really doing innovative work
19 with their data. For instance, the California
20 Community Colleges have developed their own
21 college score card, which has now morphed into
22 something more recent, into a vision for success.

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1 We are really interested to see what information
2 the institution, and if they're in a system, what
3 they are using, which is very robust.

4 For example, the University of Hawaii
5 system uses the student achievement measure. One
6 of the areas in our standards and in the
7 comprehensive review, we asked the college what
8 are they using, what is meaningful to them, and
9 have them analyze that data for us.

10 That gives us a way to track what other
11 types of data that is being used and the
12 conversations and analyses happening on behalf of
13 that data, and then the plans for improvement that
14 comes from that, as well.

15 MR. ZARAGOZA: Are there any promising
16 data -- just elaborate a little bit more on that.

17 MS. CHRISTIAN: What I'd like to add
18 to that is talking about it from a state perspective
19 in California. I was so excited when Diane Auer
20 Jones was presenting and taking rapid notes because
21 one of the points she made was this collaboration,
22 the triad, with the agency, U.S. Department of Ed,

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1 and the states. What I'd like to brag about is
2 the collaboration that's happening with ACCJC with
3 our state agencies, both in the Pacific, that Mary
4 can talk about, and in California.

5 Specifically to your question, when you
6 look at the traditional metrics for student
7 achievement, you have the certificate of
8 achievement, the degree, and transfer achievement
9 completion. To that, our state agency, the state
10 chancellor's office of the California Community
11 Colleges, has added what is called skills builders.

12 It's looked at from the standpoint of
13 on-ramping, like a pathway to certificate and
14 degree completion. Everything is related to jobs
15 or continuing with your education, so it's very
16 systematically done. That is now provided to the
17 field, and we include it in accreditation reports
18 back to the agency.

19 This is specifically for the
20 non-traditional population that are not coming
21 directly from high schools, but they're out in the
22 field, like the 25 year olds coming back to gain

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1 those skills. Those skill builder metrics are
2 tied to employment, as well, but the chancellor's
3 office verifies and provides back to the
4 institution, so that's one example. Thank you.

5 DR. WALTON: I think maybe sharing a
6 couple of examples -- I know you want data, rather
7 than anecdotes, but in my mathematician hat, I used
8 to say to people it's very easy for me to give you
9 a number; it's very difficult for me to give you
10 a meaningful number. The range of what we look
11 at -- I have two experiences that I'll briefly share
12 with you.

13 One is our Pacific colleges. Mary
14 could obviously say much more, but I was on a visit
15 to the Marshall Islands when a tropical storm went
16 through. The college was the only institution
17 still functioning on the atoll. I realized what
18 an integral part of society those colleges play.

19 I don't know what the metric for that
20 is. Then at my own college -- I saw some of you
21 raise your eyebrows when Richard said students may
22 only want a single course. My college is on the

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1 same road as Intel corporate headquarters. I've
2 had many students say to me I need this math class.

3 I do not want a degree; I do not want a certificate;
4 I don't want anything else. I want this single
5 class because it will get me a promotion to a
6 different grade of work. I will be delighted, my
7 employer will be delighted, and yet, on many
8 standard metrics, I will show up as a failure.
9 You're right. We struggle with how to capture that
10 success information.

11 MR. PRESSNELL: I must say I love it
12 when a mathematician adds color around his numbers.

13 I'm the humanities guy. I like the qualitative
14 basis. This is good. Mr. Chairman, we'd be happy
15 to open it up.

16 CHAIR KEISER: Questions? Ralph. I
17 have one. Simon.

18 MR. WOLFF: Good morning, and good to
19 see you all. Also want to commend you for the
20 progress you've made. One a comment, and then a
21 question. I'm looking for your dues, and I can't
22 find them on your website, so help me find it.

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1 There's -- I've done the search for dues, schedule
2 of dues, fees, and it's not there. The reason I --

3 DR. WINN: We've discovered that, and
4 I've instructed my guy who handles stuff on the
5 website to make sure that gets posted.

6 MR. WOLFF: Great. The reason I asked
7 is you've weathered a very big storm. I know there
8 were lawsuits and trials and the like. I just
9 wondered, financially, how have you been able to
10 absorb the cost of what you've done, and how have
11 the institutions done, given the heavy public
12 institutional character?

13 Just to address your fiscal capacity,
14 looking at the staff report, it just says you have
15 adequate fiscal means, but it doesn't go into any
16 depth. I just wonder how you've been able to
17 address the additional costs of the troubles of
18 the past.

19 DR. WINN: One of my first undertakings
20 was to enter into extensive negotiations to find
21 a settlement agreement with the legal action.
22 That had huge monthly fiscal consequences. As a

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1 result of settling that -- and dues had been
2 increased annually for five years, with a
3 supplemental charge on top of that. For the first
4 year that this new team was in place, we did not
5 raise dues at all. The second year, we raised them
6 2 percent to keep track with COLA. I believe
7 that's the same we're doing for this third year.

8 At the same time, we have discontinued any special
9 assessments. Our reserves have grown comfortably
10 over the last two and a half years.

11 We are able to -- when our staff -- Ian
12 mentioned that we're now using what we call the
13 portfolio model, where the vice presidents go out
14 to the institutions, do training, go with the
15 teams. All of that is without any additional
16 charge to the institution.

17 It's all covered by the office. I
18 don't have the exact numbers, but I'm very, very
19 comfortable with where we stand financially. We
20 have good reserves. We have a meaningful
21 investment strategy that involves using those
22 reserves to our benefit. I think the region is

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1 pleased that we're not, in any way, increasing
2 their financial burden.

3 MR. WOLFF: Thank you.

4 MR. BOEHME: Do you want to ask your
5 question first?

6 CHAIR KEISER: No, I'll give it to you
7 first.

8 MR. BOEHME: Okay. Thank you so much
9 for coming. Just following up on Claude's
10 question, in terms of the loan performance, I'm
11 curious to -- I understand institutions may be
12 taking some sort of a role by increasing financial
13 literacy, but I'm just curious about what you view
14 the accreditor's responsibility is to also help
15 tackle this? It's not just the institution's
16 responsibility.

17 DR. WINN: I would point out -- let me
18 try this. I would point out that federal financial
19 aid is distributed under federal policy and not
20 a creditor policy. We do realize that it's the
21 responsibility of the creditor to ensure that the
22 educational experience for which federal dollars

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1 are allocated is, in fact, a meaningful and
2 successful academic experience.

3 There will be a brief pause. We,
4 again, encourage the institutions to work
5 responsibly with their students in the allocation
6 of federal dollars.

7 CHAIR KEISER: I'm blinking green now.

8 Jill, and then I'll make a question. Jill, good
9 luck. Speak up.

10 MS. DERBY: I'm curious about your
11 portfolio model. What shortcoming did you feel
12 it addressed, and how does it enhance your
13 assessment efforts?

14 DR. WINN: A very fair question. The
15 work of accreditation is primarily done through
16 relationships. When the office team, who embody
17 the actual work of accreditation, go to the
18 institution, represent the spirit, the philosophy,
19 the detailed interpretation of the process, a
20 consistent application of what the standards mean,
21 it makes the whole process not only more real, but
22 more reliable and productive.

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1 The vice presidents then come back to
2 the office, talk with each other. What are the
3 issues that have been identified? This then
4 informs such things as team training, conference
5 content, a workshop, and video conference
6 activities.

7 Basically, what it does is it deepens
8 and clarifies the relationship between the office
9 and the member institutions. It's a model that
10 I had worked with for 12 years with the senior
11 commission and found it to be extremely beneficial.

12 When staff sit in the office mostly, it really
13 creates a barrier and a rich turf for
14 misunderstanding between what the accreditor is
15 seeking to do and what the institutions are doing.

16 Sitting to my right is a major player in that,
17 if you want to add anything to that.

18 DR. DROKER: I guess it's teacher voice
19 time. I hope everyone can hear me. One of the
20 things I like about this is the continuity of care
21 for our early childhood ed professionals of
22 accreditation.

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1 Because we -- by having an institution
2 that you work with, not only do you get to know
3 their unique student body, their unique
4 mission -- we really want to focus on the unique
5 missions and what drives an institution -- but
6 their unique culture.

7 When I was at an institution -- I was
8 in ALO before I came to ACCJC. Sometimes, you can
9 get different answers if VPs are not out and norming
10 the information because standards can be applied
11 differently. They should be applied differently.

12 How does that lead to consistent decision making?

13 The assigned vice president really is able to
14 follow the course of the institution through their
15 reaffirmation process, through its annual checks,
16 its mid-term check, all leading to information that
17 is very viable to the decision making of the
18 commission. That is consistency at its finest.

19 MS. DERBY: Thank you.

20 CHAIR KEISER: I have a question.
21 Sorry about the -- in reading your request for
22 expansion of scope, you discussed the fact that

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1 this really doesn't change the mission of the
2 schools because basically, in one case, you have
3 135 associate degree programs and one
4 baccalaureate program.

5 Florida, I was on the commission that
6 studied and made, for then Governor Bush,
7 the -- when the community colleges wanted to create
8 the state colleges. They all promised that they
9 would have one or two baccalaureate programs, at
10 best, in specific areas where there was no
11 competition with other state institutions.

12 That went completely out the window.

13 It's almost impossible to discern between a
14 Miami-Dade, with 25-30 baccalaureate programs and
15 FIU, down the street, which creates almost all
16 similar programs, not even discussing that with
17 private institutions in the area. Yet, they still
18 call themselves a community college and get many
19 of the benefits of having that limited mission.

20 How do you -- where do you go with this? The
21 promise, at least, certainly, the assertion is that
22 this will be very limited. The Florida experience

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1 would dictate otherwise.

2 DR. WINN: Fortunately, we have the
3 privilege of picking our battles. That's not one
4 we picked. This is an issue that is settled at
5 the level of the state legislature because the
6 California master plan has defined these three
7 sectors, the UC system, the CSU system, and the
8 California community college system.

9 When the California Community Colleges
10 wished to start adding bachelor's degrees, this
11 was negotiated with the legislature. Our
12 position, as an accreditor, is you tell us. If
13 that's what you're going to be doing, we're here
14 to serve you.

15 We don't drive it; we don't monitor it.

16 It's just not our turf. We are -- we watch the
17 conversation take place. We're satisfied that the
18 constraints around the additional baccalaureate
19 degrees are very carefully defined in legislation.

20 There was a move a year or so ago to expand the
21 number, and they allowed 15 baccalaureate degrees
22 state-wide. There was a move to expand them. The

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1 move was turned down because they still wanted more
2 time to see how well these bachelor's degrees are
3 playing out in the community college sector. We
4 watch with interest; we don't drive the process.

5 CHAIR KEISER: I understand that, but
6 that process is different at a baccalaureate level
7 than at a community college level. Requirements
8 are different. The faculty credentialing is
9 different. The team composition -- there's a lot
10 of differences.

11 When you say you created three
12 different school types, why would they not -- why
13 would your schools not just transfer to WASC
14 senior, if you now have baccalaureate, rather than
15 create an additional bureaucracy?

16 DR. WINN: The understanding is that
17 the institutions we accredited must continue to
18 fundamentally self-identify as community
19 colleges. This includes the philosophy of open
20 access. It includes the philosophy of adapting
21 to a wide variety of student types. I don't think
22 there's any thought, at this point in time, that

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1 the community colleges would become baccalaureate
2 institutions, fundamentally. But I'm also
3 hearing part of your question is how do we make
4 sure that the review process that we employ, given
5 the baccalaureate degree is unique, is responsive
6 to the unique character of a baccalaureate program?

7 We make sure that there are members of
8 every review team of a baccalaureate experience.

9 We carefully monitor issues, such as faculty
10 credentials, a thoroughness of the curriculum,
11 alignment of the curriculum with the marketplace
12 and issues of that nature, which are distinct from
13 a fundamental change position.

14 CHAIR KEISER: My understanding, and
15 I think this was discussed last night at dinner,
16 which, again, obviously, not part, is that -- once
17 you reach your highest level of degree, that is
18 the type of institution that you are considered,
19 certainly, by the Department of Education. You're
20 going to be competing, in terms of looking at
21 benchmarks, as a baccalaureate program, but have
22 the outcomes of a community college. Will that

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1 not put your institutions in jeopardy?

2 MS. CHRISTIAN: Richard, can I just --

3 DR. WINN: Please.

4 MS. CHRISTIAN: So speaking as a
5 president in the field right now and dealing with
6 realities and tracking the state conversation,
7 rather than the accreditation conversation, we
8 have an issue in California right now in the
9 capacity for baccalaureate granting.

10 We have students who can't get into a
11 CSU system, so the need is significant. If, for
12 example -- Bakersfield College, we do have a
13 baccalaureate degree, but if, for example, we
14 want -- the state legislature allows us to do more
15 than one baccalaureate because right now, Senate
16 Bill 850 allows community colleges to just do one
17 baccalaureate.

18 There are 15 community colleges.
19 There is effort in Sacramento right now in having
20 those conversations. But let's say the door opens
21 up for a community college like Bakersfield College
22 to offer a second baccalaureate. We would like

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1 the option -- this is sort of advocating to NACIQI,
2 Mr. Chairman, to really consider favorably to the
3 expansion of scope. We would prefer to be with
4 ACCJC because if you look at the 37,000 students
5 that we serve, and a significant number are in
6 career technical education, getting their
7 certificates, and then they have these transfer
8 degrees.

9 The flavor of the college still remains
10 a community college, but we now can stay with ACCJC,
11 instead of being forced to move to WASC. That
12 would be my response from the field, as a president,
13 in looking at it.

14 To your question, whether we would, in
15 California, like Florida, down the line, have a
16 shift in the number -- the proportion of
17 baccalaureates we offer, I think at that point,
18 maybe I can see whether WASC senior might be the
19 more appropriate place, in terms of the mission.

20 But right now, it would be -- really, we would
21 prefer staying with ACCJC because of the mission.

22 Thank you.

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1 CHAIR KEISER: I understand that, but
2 as the increased pressure for institutions to have
3 outcomes that are better each year, or there
4 is -- you're compared to your peers, by adding the
5 baccalaureate programs, you're now being
6 recognized as a baccalaureate level program. Yet,
7 your outcomes will be more comparable to the
8 community college outcomes, which tend to be
9 significantly less. Is that in the best interests
10 of your institutions that potentially, if we ever
11 get into a point when the outcomes become critical
12 for recognition, as there were certain attempts
13 to do, that would put you in jeopardy.

14 DR. WINN: We would see this as an issue
15 primarily if the evaluation of an agency boils down
16 to some single metric. Right now, we have the
17 advantage that we can disaggregate performance
18 data by degree level, by student intentions and
19 goals.

20 So I don't think, at this point in time,
21 there's any serious risk that we would be, now,
22 placed peer to peer with baccalaureate

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1 institutions. The percentage of students who are
2 taking baccalaureate degrees across the system is
3 extremely small.

4 And so long as we can parse out those
5 performance data as a single metric and not have
6 it all lumped together, where we're compared side
7 by side with a baccalaureate institution, it's
8 probably not going to be a concern.

9 CHAIR KEISER: If you keep it small,
10 I can understand that, but that's not what happened
11 in Florida, where went from a community college
12 system to a state college system. It is a
13 challenge to disaggregate that information for a
14 student who wants to get a baccalaureate degree.

15 They do not -- they cannot distinguish
16 from a standpoint of graduating with a
17 baccalaureate from Broward College from the
18 University of Florida. Yet, the outcomes are
19 extraordinarily different. Anne.

20 MS. NEAL: I just want to continue --
21 (Simultaneous Speaking.)

22 MS. NEAL: -- with -- sorry. Did I

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1 take somebody else's spot?

2 CHAIR KEISER: No, Anne, you're up.

3 MS. NEAL: I want to continue Art's
4 avenue of questioning because I, too, worry about
5 what appears to be essentially mission. I think,
6 here at NACIQI, over the last few years, we've
7 talked particularly about the ability and the
8 positive nature of accreditors focusing on a
9 specific type of school specializing, if you will,
10 so that they really bring expertise to that kind
11 of school and what it offers. You're going in just
12 the opposite direction, potentially, by asking for
13 this expansion in scope. As I read your narrative,
14 and as I read the staff's narrative, it basically
15 says -- and this is what Art was saying -- don't
16 you worry; it won't grow.

17 We don't expect it's going to grow.
18 Right now, California says it doesn't want
19 anything. We don't really have any requests from
20 some of our other states, so this is not likely
21 to be a big thing.

22 What I worry about is that institutions

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1 like ours, NACIQI, by allowing this kind of mission
2 -- on the condition that don't worry, it won't get
3 bigger, in effect, can authorize mission in
4 something that will not, in the long term,
5 potentially be good.

6 To Art's point, it may grow, in which
7 case, then, all of a sudden, a specialized
8 community college accreditor with a unique
9 expertise has now become like everybody else. I
10 guess I'm a little worried about that. As I look
11 here, it appears that your ability to show your
12 expertise vis-a-vis BA is also fairly limited.
13 As best I can tell, you gave one example to the
14 staff. I have one or two follow-up questions after
15 this.

16 DR. WINN: To clarify, we currently are
17 authorized to review and approve a baccalaureate
18 degree. Right now, we are limited to only the
19 first. The proposal is that the numeric
20 limitation be removed. All of our qualifications
21 remain the same.

22 I would, again, emphasize that the

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1 issue of expansion to baccalaureate degrees is a
2 state-level issue. It's not something that's
3 being driven by the accreditors. We are committed
4 to the concept of being open to innovation, to being
5 responsive to the needs of the region, as those
6 needs emerge.

7 That includes a very carefully defined
8 set of baccalaureate degrees, circumscribed to
9 make sure that they're not in competition with the
10 CSU system. The ability that we have, then, is
11 once those things are vetted at the state level,
12 we stand ready to provide the service should the
13 day come that any of our colleges want to expand
14 to a second baccalaureate degree.

15 DR. WALTON: I think I would also add
16 the origin of this is really market driven. It's
17 students saying we want credentials that we're
18 having difficulty getting, for a variety of
19 reasons. In California, it would be because it's
20 a specialized baccalaureate and/or the student
21 can't get into CSU or UC.

22 In the Pacific Islands, it might well

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1 be that there isn't a baccalaureate degree offering
2 institution for thousands of miles of ocean around.

3 When the students say we want this and, in some
4 sense, the state, certainly in California, has
5 determined that the most cost effective way of
6 doing it, at the moment, is with the existing
7 community colleges, in a sense, we, as an
8 accrediting agency, are saying we take all that
9 analysis; we would like to be able to do that for
10 you and with you.

11 Who knows what will happen down the
12 line? I can't predict the future, but it seems
13 like the demand, at the moment, this is the
14 appropriate response.

15 DR. WINN: Perhaps we could ask Mary
16 to speak to the value of baccalaureate degrees in
17 the Pacific Islands.

18 DR. OKADA: Covering the Marshall
19 Islands, Palau, the Federated States of
20 Micronesia, the only institution that has a
21 physical presence nearby is really the University
22 of Guam. Then the only other institution in the

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1 Commonwealth of the Northern Marianas that is now
2 under WASC senior is also offering, I believe, two
3 baccalaureate programs.

4 Most of the institutions in the Pacific
5 are interested in baccalaureate degrees for
6 education. For the Guam Community College, we
7 don't have a baccalaureate degree yet, but we are
8 looking at something in the field of career and
9 technical education that is currently not offered
10 as part of the University of Guam.

11 That provides a different scope for our
12 institutions because of our remoteness. I know
13 that American Samoa also has the baccalaureate
14 degree in education to support their K-12 system.

15 MS. NEAL: I appreciate that.
16 Obviously, we here, on NACIQI, are required to look
17 at accreditors to ensure that they can ensure
18 educational quality, so that's what we're looking
19 at as we look at your request for this expansion.

20 Let me just flip to another issue. As I looked,
21 with some amazement, really, at the happiness of
22 the third-parties have offered their comments and

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1 Kumbaya moments. Everyone's getting along
2 beautifully. I'm wondering, as I looked, it
3 appeared that you have taken no adverse action
4 since June 2017. Is that true?

5 DR. WINN: The federal definition of
6 adverse action is the removal or denial of
7 accredited status. That is true; we have not.

8 MS. NEAL: That makes a lot of people
9 much happier, I'm sure.

10 DR. WINN: I would question that. An
11 adverse action is a tragic experience. We do our
12 best work when we make sure that an institution
13 never goes that direction.

14 We work closely with other forms of
15 getting their attention that are known as
16 sanctions, increasing levels of sanctions. The
17 purpose is not to elicit good will; the purpose
18 is to deal fairly and even handedly with our
19 institutions in a way to help them flourish.

20 CHAIR KEISER: Rick. Jill first.
21 Jill, Rick, Simon.

22 MS. DERBY: I just want to weigh in from

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1 the Nevada experience, in terms of this discussion,
2 Art. That is that in Nevada, it was just the
3 market. It was the need. The universities and
4 state college of choice, they didn't want to offer
5 these more technically oriented degrees. There
6 was a need for it. I think that always drives it.

7 I think that the issues you and Anne
8 have raised about mission creed, but about quality
9 of assessment, given what the focus is and so forth,
10 are issues. But I think we'll see more of that.

11 I can't speak to the Florida
12 experience, but I know in Nevada, it was driven
13 completely by the need for certain kinds of
14 degrees, technically oriented, baccalaureate
15 degrees that the universities and state college
16 weren't going to offer.

17 Therefore, that's something to adapt
18 to because I think we'll see more of that. I'd
19 be surprised if, in Florida, they're offering
20 similar degrees, universities, than at the
21 community colleges.

22 CHAIR KEISER: Exactly. Nursing,

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1 business, it's all the same.

2 MS. DERBY: They're offering the same
3 degrees?

4 CHAIR KEISER: Especially the same
5 ones that I offer, too. Selfish motive here.
6 Claude, you know that, too.

7 MR. PRESSNELL: Oh, yes.

8 CHAIR KEISER: Rick, and then Simon,
9 and then Ralph.

10 MR. O'DONNELL: My question,
11 continuing along the same vein of thoughts, my
12 experience, I was at SHEO (phonetic) for a period
13 of time. Often, people would say there were market
14 pressures, that the legislature wanted to do that,
15 but I often believed they were -- I don't want to
16 be pejorative, but you had industry associations
17 pushing credentials.

18 I think Diane Auer Jones mentioned this
19 earlier about the consensus, that the higher
20 credentials, moving from associate's to
21 baccalaureate, baccalaureate to master's, really
22 in the interest of students in the profession, or

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1 are they being driven by other institutions,
2 frankly, that would benefit from that, either by
3 making it more difficult for students to enter the
4 field and, therefore, raising wages artificially
5 for existing members of the field, or, frankly,
6 institutions, themselves, that want to offer these
7 for more enrollment, and the only way to do that
8 is to acquire more credentials. My question is
9 do you have any thoughts on -- we don't know what
10 the final rulemaking is, but what Diane talked
11 about earlier about requiring accreditors to ask,
12 if institutions offer a new type of higher-level
13 credential, if they're really necessary and what's
14 really behind them?

15 Because just because a state wants it,
16 frankly, you're part of the triad. An accreditor
17 maybe should push back against states sometimes
18 maybe making decisions that aren't in the best
19 interests of students and the institutions.

20 I'm just curious how you think about
21 what could be coming at some point in a final
22 rulemaking that accreditors -- and I don't know

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1 the exact language, but should be looking at
2 credential inflation, asking what's really driving
3 it and what's behind it.

4 DR. WINN: I would suggest the issue
5 of credential creep is only very, very tangentially
6 an accreditor issue. It's a profession issue.
7 It's an institutional issue. We enter the fray
8 at the moment when an institution comes to us and
9 says we want to offer the following degree. We
10 look at it in terms of what processes have you used?
11 What evidence have you garnered? Who's been
12 involved in making the decision? Will it be a
13 legitimate expression of your mission? We do not
14 drive advanced degrees.

15 We remain responsive to reasonable
16 requests for advanced degrees. Similarly, we do
17 push the idea of accrediting bachelor's degrees.

18 Those have, in fact, arisen from legitimate needs
19 within the region of the institutions that we
20 accredit.

21 Mary spoke to the fact that out in the
22 Pacific Islands, the only opportunity the teaching

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1 core has to obtain an appropriate bachelor's degree
2 is by means of the local community college.

3 If they leave the island, they don't
4 come back, or it's too expensive to go. These are
5 absolute legitimate needs that have arisen from
6 the market that we serve. We do not drive that
7 particular process.

8 MR. BOEHME: I'm going to yield my time
9 to Ralph because it's relevant to this, and then
10 I'll go after him.

11 MR. WOLFF: This issue is largely one
12 of structure between the WASC junior, ACCJC, and
13 Senior College Commission. SACS already has this
14 authority; so does Middle States and Higher
15 Learning Commission.

16 If a community college -- Broward
17 Community College has 12 or 20 baccalaureate
18 degrees, it's not a change of scope for SACS; it's
19 an issue that SACS might determine which commission
20 or which group is going to review the institution.

21 It is my understanding, but I think you
22 might need to address, given the structural

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1 difference that's unique between the four year WASC
2 senior and the Community College Commission, and
3 I know that at some point, there were conversations
4 about unification, but the decision was made not
5 to unify.

6 I'm assuming, and you may wish to
7 verify, that the Senior College Commission is not
8 seeking to block this, but is it supportive or
9 neutral, or where is it, given the distinct role
10 that the ACCJC plays in relation to every other
11 regional accreditor?

12 DR. WINN: The senior commission has
13 taken no position on this, whatsoever. That's
14 partly because there's a recognition that the kind
15 of baccalaureate degrees are very distinctive and
16 uniquely tied to the mission of a community
17 college.

18 For those who may be just a little
19 distant from this curious arrangement, when
20 accreditation agencies began to be formed in the
21 1880s, moving from New England down the middle
22 states in the 1890s and to SACS in the early 1900s

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1 and Northwest in 1912, there was no such thing as
2 a community college.

3 When the WASC region organized itself
4 in the 1950s, following the GI Bill, the Truman
5 Commission, a number of initiatives really
6 clarified and solidified that the community
7 college is a unique and distinct sector, in and
8 of itself, with a distinctive mission, purpose,
9 character, and so on.

10 In the 1950s, the WASC region said there
11 will be two accreditors because the large,
12 extensive community college system deserves an
13 accrediting agency that understands its unique
14 character. So the thought of -- there were some
15 political issues that were at play that raised the
16 possibility of all the community colleges going
17 to the senior commission. What we're reading
18 right now is a great sense of relief that that
19 conversation is off the table, that they're glad
20 for an accrediting agency that is responsible to
21 the unique mission and character of the community
22 colleges.

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1 DR. DROKER: I'd like to go back to a
2 question that was asked earlier, where -- about
3 the rigor and asking the hard questions about these
4 baccalaureate degrees. The fact is we, the
5 accreditor, require higher standards than the
6 state does on the higher -- on the upper division
7 general education.

8 That's one area where we've pushed the
9 envelope to make sure the rigor is there for
10 baccalaureate degrees. That did not make a lot
11 of friends with the State of California. I think
12 it's important to note that we do recognize our
13 role in making sure that the rigor, the
14 understanding between the lower-level learning
15 outcomes to the upper division learning outcomes
16 have to be clearly articulated. I think that was
17 something that the department staff saw during our
18 sub-change progress with the baccalaureate degree
19 reviews. But it has been a difficult
20 conversation. It is something that we continue
21 to look at as we move forward in reviewing
22 baccalaureate degrees.

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1 CHAIR KEISER: Questions? Federico,
2 then Simon. You wanted to be last, Simon, right?

3 MR. BOEHME: Go ahead. You go.

4 MR. PRESSNELL: I want to go back. I'm
5 wondering, on the baccalaureates, are they going
6 to be largely applied science baccalaureates,
7 non-transferrable baccalaureates? Are they going
8 to be academic in nature? I know it's going to
9 be according to the mission of the institution;
10 I understand that.

11 That's one. The other is will you see
12 a tipping point? At what point would an
13 institution that offers -- what number of
14 baccalaureates before they need to go to the senior
15 level? It's not all about being open admission.

16 Do you have in mind -- I realize now,
17 your authority has only been under the first
18 baccalaureate. You're looking to expand it. But
19 I'm saying looking down the road, if you have a
20 Florida experience, at what point do they tip over
21 and it's like you're really no longer a community
22 college? Then lastly, if you could, just get a

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1 little bit in the weeds, in terms of your peer
2 assessment for the baccalaureate piece
3 versus -- because I'm in hopes that you're not just
4 simply using another institution that just has one
5 baccalaureate to evaluate a baccalaureate at
6 another institution.

7 DR. WINN: Given the political
8 realities in California right now, we may go for
9 years without ever seeing an application for a
10 second baccalaureate. This is not anything we're
11 pushing or driving. This is like we're saying we
12 want to be responsive should that need arise.

13 The nature of these baccalaureate
14 degrees are defined at the chancellor's office,
15 the state legislature, and we simply want to be
16 responsive to what may emerge. We will do our
17 absolute best, as Stephanie has pointed out, to
18 bring every appropriate level of rigor, to make
19 sure that whatever comes across our transom, we
20 respond to with rigor and great care. But I don't
21 know that any of us are in a position to predict
22 where this is going to go, going forward. It's

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1 an entirely different political environment in
2 California than it is in Florida.

3 MR. PRESSNELL: I understand that.
4 I'm not suggesting that you're driving it. I'm
5 convinced of your arguments that you're not driving
6 this at all. I'm more concerned about whether or
7 not -- about are you tracking that baccalaureate
8 experience separately from the associate degree
9 experience?

10 Do you have separate datasets that
11 you're following that, and you're holding the
12 baccalaureate to a different -- to the
13 baccalaureate level versus -- that's really
14 what -- convince us you're doing that, I guess.

15 DR. DROKER: We actually have a
16 standard that has the requirements for the
17 baccalaureate. There's a whole protocol that a
18 college has to meet for the baccalaureate.

19 MR. PRESSNELL: Are they similar to
20 WASC senior for the baccalaureate?

21 DR. DROKER: I don't know. I'm sorry.

22 MR. PRESSNELL: That's interesting.

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1 DR. DROKER: I can this about WASC
2 senior. Our standard structure looks very
3 different. I don't know if I can make that
4 comparison.

5 DR. WINN: Again, the nature of the
6 baccalaureate degrees that have been brought to
7 us are very carefully defined as meeting a specific
8 employment niche that is not currently met. It
9 is definitely a career-oriented --

10 (Simultaneous speaking)

11 MR. PRESSNELL: That was my applied
12 science versus academic. Are they more applied
13 science?

14 MS. CHRISTIAN: Two points. Again,
15 talking from the field, the state political tension
16 is really trying to make sure that if a community
17 college offers a baccalaureate, it is not in
18 competition with a CSU. So the guardrails that
19 are set up by the state ensure that the
20 baccalaureates are unique and serving a need.

21 The application to the state -- and I'm
22 not talking about accreditation, but just the

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1 conversation today -- is very, very rigorous in
2 making the case that it is very unique and what
3 workforce need is it. The degrees are more
4 technical in nature, rather than a baccalaureate
5 in history, for example. That's one point. The
6 second point, in terms of the rigor, for the
7 baccalaureate at the college, when we needed to
8 go through the process, we actually collaborated
9 with our local CSU. For the upper division gen
10 ed outcomes, we had the CSU curriculum committee
11 that goes through the definition and the
12 evaluation.

13 We worked in collaboration for our
14 first submission to ACCJC for the substantive
15 change process. That's for the gen ed piece. For
16 the technical piece, there is no comparison because
17 the CSU doesn't offer a comparable degree. The
18 degrees we offer are in dental hygiene.

19 Ours is in industrial automation.
20 Those technical degrees, the outcomes, we work with
21 industry standards and establish those outcomes.
22 It's very different. The reporting process is

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1 very different. We have dashboards for the
2 baccalaureate.

3 The State of California provides
4 dashboards, so the reporting structure is
5 different for the baccalaureate, for the
6 associate's, and the certificate. Those learning
7 outcomes are substantially higher, particularly
8 the general education areas. Thank you.

9 CHAIR KEISER: Simon.

10 MR. BOEHME: Great. I'm going to be
11 changing gears. Maybe this excites you, maybe
12 not. When I first started at NACIQI, I was very
13 passionate, and I still am, about having student
14 members serve as public members on your board.

15 I thought within six years, since I've
16 been on NACIQI, we'd have some students, but
17 unfortunately, that's not the case. Ben Miller,
18 from the Center for American Progress, came out
19 with a really interesting report, which I'm sure
20 you've seen, which talks about public members.

21 I think public membership is one of the
22 most important components of accreditation

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1 agencies -- I don't think it's discussed enough.

2 Partly because public membership of the committee
3 of accrediting boards is so important is because
4 it provides an outside perspective, which I think
5 is direly needed by accrediting agencies.

6 It helps to prevent group think that
7 addresses the conflict of issue. In looking at
8 Ben Miller's report, it states that you have two
9 former college admins, two former professors, and
10 one education consultant. I know you have
11 identified yourself as a former professor, as a
12 public member. I find this really concerning.
13 I would encourage you to think about how, moving
14 forward, for your next public members, how you can
15 leave having former faculty members as your public
16 members. To me, it's confusing.

17 Of course, I'd encourage you to think
18 about a student, but I think having someone from
19 private industry, someone from a business or
20 someone who can provide insight to what skills are
21 needed for this 21st Century Workforce. I don't
22 know if you want to respond to that, but it's a

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1 comment that I have when it comes to public members.

2 DR. WINN: I'm sure that it comes under
3 the heading of standard questions for improvement.

4 CHAIR KEISER: Frank.

5 VICE CHAIR WU: This is more a question
6 for staff and for us. I just want to make sure
7 I have something right, which is we, NACIQI -- and
8 actually, I think the Department of Ed,
9 overall -- we don't care what accrediting agency
10 any institution goes to, right? That's outside
11 the purview of the Higher Ed Act. They can pick
12 whoever they want. We don't really care, as long
13 as it's recognized by the Department. That's
14 right from Herman.

15 MR. BOUNDS: Yes, that's right.

16 VICE CHAIR WU: Okay, yes. I just
17 wanted to make sure. That's helpful to me because
18 it means to the extent that there is a choice,
19 that's fine with us.

20 MR. BOUNDS: I just did want to add,
21 under the current rules and statute, the
22 institutions are still limited to their regions

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1 right now. They're still limited to the regional
2 structure. But in a sense, the national
3 accreditor, they can go wherever they -- excuse
4 me, an institution who's accredited by a national
5 can pick and choose. The regions, right now, they
6 are still established.

7 CHAIR KEISER: Mine's not working, so
8 I'll speak up. Seeing there are no more questions,
9 thank you. Are there third-party comments?
10 Anybody from a third party like to speak? Boy,
11 last time it was a long meeting.

12 (Simultaneous Speaking.)

13 CHAIR KEISER: I do want to put on the
14 record that Kathleen Sullivan Alioto recused
15 herself because of her involvement with Community
16 College of San Francisco. Thank you very much.

17 Will the agency official come forward? I really
18 meant department official, but you are an agency,
19 and I've known you a long time.

20 MS. DAGGETT: I didn't have anything
21 exceptional to add, other than I know it wasn't
22 necessarily as explained in this particular

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1 request for expansion of scope, but they previously
2 did do a crosswalk with all the other regional
3 accreditors in developing their standards. I
4 think we've gotten past that, at this point, but
5 that wasn't included in this particular one. I
6 know that they have done it in the past, when they
7 were first trying to put together their own
8 standards, that they did do that type of crosswalk
9 to ensure that. As far as the expansion of scope
10 goes, for this particular agency, it has been a
11 long process to get to this point.

12 I think department staff is
13 exceptionally comfortable with the review. Even
14 though it was one full, complete, comprehensive
15 example in this particular petition, we've seen
16 multiple examples and also gone on site at multiple
17 times to feel comfortable about that.

18 CHAIR KEISER: Thank you. Questions
19 for --

20 MR. PRESSNELL: I just would say I'm
21 glad to hear it. I was a little taken aback by
22 the response to my question, but I'm glad to hear

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1 that. It just seemed to be best practices that
2 you would look, at least, at WASC senior, how they
3 evaluate baccalaureate before you just start
4 approving them on your own.

5 MS. DAGGETT: Like some of these other
6 members that have been around for a while with this
7 agency.

8 CHAIR KEISER: Simon.

9 MR. BOEHME: Just one question. I
10 should compliment Richard. I think since Richard
11 took over at ACCJC, he's come to every single NACIQI
12 meeting. Because you're a veteran of NACIQI, I'm
13 curious if there's been other executive directors,
14 like Richard, who have come to every single NACIQI
15 meeting?

16 MS. DAGGETT: Oh, definitely, and I can
17 --

18 (Simultaneous Speaking)

19 MS. DAGGETT: It's not every single one,
20 but there are some -- and some, also, it's travel.

21 Coming from the West Coast, that's pretty
22 significant. I'd say most of the local ones, it's

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1 been on a regular basis.

2 I think that the agencies understand,
3 at least the ones that continue to want to continue
4 to do better and continue to want to meet our
5 regulations, they understand that listening to
6 these conversations are important.

7 MR. BOEHME: I think Richard probably
8 would get an A plus, in terms of attendance.

9 MS. DAGGETT: There you go, Richard,
10 A plus.

11 CHAIR KEISER: Thank you. I'll
12 entertain a motion from the readers.

13 MR. PRESSNELL: I move that NACIQI
14 recommend -- thank you -- that NACIQI recommend
15 that ACCJC be approved for recognition and renewed
16 for five years. I further move that NACIQI
17 recommend that the senior department official
18 grant the agency's request for an expansion of its
19 scope to recognize -- with recognition to include
20 beyond the first baccalaureate.

21 MR. ZARAGOZA: I second.

22 CHAIR KEISER: Second by Federico.

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1 Further discussion?

2 MS. NEAL: Is that a single motion?

3 CHAIR KEISER: That's a single motion.

4 MR. O'DONNELL: Can I make a substitute
5 motion? Is this the time to do that?

6 CHAIR KEISER: You can attempt to.

7 (Simultaneous Speaking.)

8 MR. O'DONNELL: My substitute motion
9 would be just to renew the agency's recognition
10 for a period of five years, but I don't know what
11 the right word is, but disapprove the agency's
12 request for an expansion of scope.

13 CHAIR KEISER: Would you folks accept
14 that as a substitute motion or stay with your first
15 --

16 (Simultaneous Speaking)

17 MR. PRESSNELL: No, we'll keep the
18 original motion.

19 CHAIR KEISER: It can't be a substitute
20 because it's not accepted by the first and second.
21 Would you like to discuss that?

22 MR. O'DONNELL: No, I'll be voting

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1 against the motion as it currently reads.

2 CHAIR KEISER: Any further discussion?

3 All those in favor of the motion, signify by saying
4 aye, raise your hands, do not say aye.

5 (Show of hands.)

6 CHAIR KEISER: All those opposed.

7 (Show of hands.)

8 CHAIR KEISER: Motion carries.
9 Congratulations. Taking the prerogative to tell
10 you you've come a long way, congratulations. Do
11 we want to take a break? Let's take an 11-minute
12 break.

13 (Whereupon, the above-entitled matter
14 went off the record at 10:48 a.m. and resumed at
15 11:02 a.m.)

16 CHAIR KEISER: I'm going to get
17 started. Our next agency that we'll be looking
18 at is the renewal of recognition for the
19 Accrediting Council for Continuing Education and
20 Training, ACCET. The primary readers were John
21 Etchemendy and Anne Neal. Anne, you're here;
22 John's not. Department staff is Valerie Lefor.

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1 Would you like to introduce the agency,
2 Anne?

3 MS. NEAL: We have before us the
4 Accrediting Council on Continuing Education --

5 CHAIR KEISER: Microphone. Thank
6 you.

7 MS. NEAL: We have, today, the
8 Accrediting Council on Continuing Education and
9 Training, which is a national institutional
10 accreditor. It accredits institutions of higher
11 education that provide continuing education and
12 training programs, including those institutions
13 that are authorized to award certificates and
14 occupational associate degrees.

15 The agency classifies educational
16 programs as either continuing education vocational
17 programs or continuing education avocational
18 programs. They are seeking petition for continued
19 recognition, and the staff has recommended that
20 they be renewed for five years.

21 CHAIR KEISER: Valerie. Almost every
22 one's working.

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1 MS. LEFOR: This one's working. Good
2 morning, Mr. Chair and members of the committee.

3 For the record, my name is Valerie Lefor, and I
4 will be presenting a summary of the petition for
5 continued recognition submitted by the Accrediting
6 Council for Continuing Education and Training,
7 referred to as ACCET or the agency.

8 The staff recommendation to the senior
9 department official for the agency is to renew the
10 agency's recognition for a period of five years.

11 ACCET was scheduled for review at the summer 2018
12 NACIQI meeting; however, due to retirements within
13 the accreditation group and workload
14 reassignments, the agency was deferred.

15 ACCET was then scheduled to appear
16 before NACIQI at the winter 2019 meeting, which
17 was to be held on February 5, 2019. However, due
18 to a lapse in appropriation, the meeting was
19 canceled. Department staff completed the review
20 of the agency's petition for recognition and
21 provided the agency with a draft staff analysis.

22 The agency was given the required response time.

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1 Department staff provided the agency with a final
2 report and made that report available to the
3 public. In addition, third-party comments were
4 requested, reviewed, and analyzed, as part of
5 department staff's review of the agency's petition
6 for recognition, in preparation for the winter 2019
7 meeting.

8 The current meeting is the first
9 opportunity that has been available to bring the
10 agency up for consideration by NACIQI. Based on
11 the review of the information in the agency's
12 petition and the observation of a site visit and
13 a commission meeting, department staff found that
14 ACCET is in compliance with the secretary's
15 criteria for recognition, with no issues or
16 concerns.

17 The department did not receive any
18 written third-party comments and has received and
19 closed three complaints during this review cycle
20 regarding the agency. Therefore, again, the staff
21 recommendation to the senior department official
22 is to renew the agency's recognition for a period

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1 of five years. Representatives from the agency
2 are here, and I'm happy to answer any questions
3 that you may have. This concludes my report.
4 Thank you.

5 MS. NEAL: Can you tell us a bit more
6 about these complaints you referenced?

7 MS. LEFOR: Yes. The first complaint
8 was requesting assistance in obtaining a
9 transcript for a closed school. The second had
10 concerns related to ACCET's standards, primarily
11 related to due process, 602.25. The third had
12 concerns relative to 602.15, competency of
13 representatives, 602.18, consistency in decision
14 making, and 602.23, in terms of processing
15 complaints.

16 MS. NEAL: These were all resolved how?

17 MS. LEFOR: The first two were closed
18 without any findings for ACCET. The third one
19 was -- one issue was found relative to processing
20 of complaints and the agency following its
21 procedures relative to that.

22 MS. NEAL: Then what happened?

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1 MS. LEFOR: We're still working to get
2 the final policy. The agency has put forward a
3 new policy, and we're still working to get that
4 final policy. It will be voted on this week. This
5 week is also the agency's commission meeting.

6 MS. NEAL: That has not -- that has not
7 been resolved. It's not part of your -- that's
8 not raised any concern.

9 MS. LEFOR: Not at this point. The
10 timing of it -- when I did the review for this
11 meeting -- it was for the February meeting -- the
12 complaint that this resulted from came to us in
13 April, so that happened after I had reviewed, but
14 I have full confidence that this issue will be
15 resolved with the new policy that will be brought
16 forward.

17 MS. NEAL: Thank you. I'm sure we'll
18 hear from the agency.

19 MS. LEFOR: You're welcome.

20 CHAIR KEISER: Thank you, Valerie.
21 Will the agency representatives please come
22 forward and introduce yourselves?

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1 MR. DUNLOP: Good morning. I'm Paul
2 Dunlop. I'm chair of the -- good morning.

3 CHAIR KEISER: Could you give him a
4 microphone, please? Thank you.

5 MR. DUNLOP: My name is Paul Dunlop,
6 and I'm the current chair of ACCET, the Accrediting
7 Council for Continuing Education and Training.
8 I am a public commissioner and, in my professional
9 life, I serve as a dean of summer session at Lake
10 Forest Academy, in Illinois. I am also a former
11 director of an intensive English program campus.

12 On behalf of my 14 commissioner
13 colleagues and myself, we are very proud of the
14 role that ACCET has played in the service and
15 support of its members, as well as its engagement
16 in the accreditation community. This is largely
17 due to a dedicated and talented staff, a number
18 of whom I would like to introduce at this time.

19 Dr. Bill Larkin, to my immediate right,
20 has served as executive director of ACCET since
21 2013. Bill brought a versatile background to the
22 position, as well as a style that empowers staff

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1 and is highly collaborative.

2 In his career that spans 45 years, Bill
3 has served as the higher education deputy secretary
4 for the Commonwealth of Pennsylvania, the
5 president for a not-for-profit regionally
6 accredited college, and the president of a large
7 for-profit college. His resume also includes more
8 than 25 years in traditional university student
9 affairs work, including two chief student affairs
10 positions. Today, Bill will provide an ACCET
11 overview. Next to Bill is Judy Hendrickson, our
12 deputy executive director. Judy has been with
13 ACCET for more than 12 years, having previously
14 served in a leadership capacity for the Maryland
15 Higher Education Commission for 18 years.

16 Judy is a former president of NASHAPS
17 (phonetic) and is a primary author of ACCET's fully
18 compliant re-recognition petition. Today, she
19 will address ACCET's decision activities,
20 potential risk factors, and ACCET's efforts to
21 improve program institutional quality.

22 Linsay Oakdon has also served ACCET for

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1 more than ten years and currently serves as an
2 assistant executive director overseeing our team
3 visits and reports, as well as our completion and
4 placement function. Linsay is a former college
5 English teacher.

6 Today, she will address ACCET's focus
7 on student success. Finally, please meet John
8 Shaheen, the associate executive director. John
9 has been on the ACCET staff for six years and is
10 responsible for training, development, initial
11 applications, complaints, to name but a few
12 functions. John also brings invaluable insight
13 and experience to the staff as a former ACCET owner
14 and member, ACCET commissioner, and ACCET
15 commission chair. Today, John will address
16 ACCET's comprehensive and integrated complaint
17 process.

18 On behalf of the commission and staff,
19 I would also like to thank the professionals in
20 the department's accreditation group, especially
21 Herman Bounds, and most especially Valerie Lefor,
22 for their extraordinary guidance, counsel, and

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1 support. Now, let me turn this over to Bill for
2 his overview. We are pleased to share some
3 information about ACCET that we hope will prove
4 helpful.

5 DR. LARKIN: Thank you, Paul. Good
6 morning, everybody. We're especially happy to
7 finally be here. I'd like to second Paul's
8 comments in regards to the support that both Herman
9 and Valerie have afforded us during this journey.

10 I appreciate that NACIQI has already
11 reviewed ACCET's paperwork. Let me note that our
12 petition was submitted in early 2018, but some of
13 the data we'll share today has been updated as of
14 December 31, 2018. ACCET's been recognized and
15 re-recognized continuously with five-year grants
16 since 1978. Our agency serves a broad membership,
17 totaling 217 main campuses, with total locations
18 numbering 602. Of these, there are 78 main
19 campuses with Title IV programs, at a total of 160
20 locations.

21 The other major membership group is
22 composed of avocational intensive English

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1 institutions that are required by law to
2 accredited. ACCET accredits 84 such main
3 campuses, with total locations numbering 2,012.

4 Our gatekeeper function for the student
5 exchange visitor program is of rigor comparable
6 to our Title IV gatekeeper role. We also accredit
7 non-Title IV vocational institutions at 74
8 locations and a myriad of other avocational
9 institutions at 156 sites here in the United States
10 and in five countries overseas.

11 Sixteen main campuses are not for
12 profit, none are publicly traded, and the one
13 institution listed on the dashboard as having been
14 placed on HMC-2 is in teach-out status, with a
15 planned closure intended. Our accredited Title
16 IV institutions tend to be modest in enrollment
17 size, with most total enrollments under 450
18 students and only five Title IV institutions
19 reporting enrollments above 1,000 students. In
20 a given year, during the past six years, total
21 annual student enrollment at asset schools was more
22 than 500,000.

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1 Asset scope permits our agency to
2 accredit institutions offering diplomas,
3 certificates, occupational associate degrees, and
4 instruction via interaction distance learning.
5 The agency's roots, when founded in 1974, are still
6 represented well today by institutions that offer
7 professional development and leadership training
8 opportunities. This group of institutions in our
9 scope has afforded a locus for innovation.

10 ACCET awards one, three, and five-year
11 grants. All Title IV schools and new intensive
12 English institutions receive a quality assurance
13 visit around the halfway mark of their grant
14 period, with only 24 hours' advance notice. The
15 number of such visits during the past six years
16 is approximately 200. Our standards for initial
17 accreditation and re-accreditation are vigorous.

18 Our members expect us to be tough, fair, and user
19 friendly. Indeed, 38 institutions or 26 percent
20 of initial applicants in the past six years have
21 not -- have been denied accreditation. The
22 commission does not hesitate to require initial

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1 applicants to teach-out campuses or academic
2 programs that do not meet ACCET's completion and
3 job placement standards prior to approval and
4 accreditation.

5 Additionally, 25 ACCET main campuses
6 have either been denied re-accreditation or have
7 had their accreditation withdrawn in the same
8 period. For the record, three Title IV schools
9 and seven intensive English programs were denied
10 re-accreditation by commission action.

11 The ACCET commission is composed of 15
12 members, 7 of whom are public members, an unusually
13 high number of public members in comparison with
14 other institutional accreditors.

15 The commission has been a leader since
16 1989 in establishing bright-line measures for
17 program completion and job placement rates,
18 currently at 67 percent and 70 percent,
19 respectively. The annual reporting of all Title
20 IV asset institutions in 2018 indicated that the
21 average aggregate completion rate was 71 percent,
22 with job placement rates at 75 percent. In

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1 conclusion, ACCET's scope and diversity of
2 membership remains constant, as does its focus on
3 student outcomes.

4 In the last six years, the size of our
5 commission has been expanded from 13 to 15 members.

6 We have seen revisions to policies for clarity
7 purposes and have improved the process for
8 institutions that seek to transition from for
9 profit to non-profit.

10 The agency remains committed to its
11 members to assure student success. My colleagues
12 will now expand on the information contained in
13 my introductory overview, being sure to address
14 other items contained in the general questions and
15 the pilot questions. We all stand ready to answer
16 your questions relating to this petition. Thank
17 you, and here's Judy.

18 MS. HENDRICKSON: Good morning. I'll
19 be presenting a summary of ACCET's decisions,
20 activities, process for monitoring potential risk
21 factors, and efforts to improve program and
22 institutional quality and to facilitate

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1 innovation. Since ACCET's previous recognition
2 review in 2013, the ACCET accrediting commission
3 has taken vigorous actions, including the
4 following. As previously mentioned, 26 percent
5 of applicants were denied initial accreditation,
6 and 5 percent of ACCET institutions were denied
7 re-accreditation.

8 Fifty-two institutions were placed on
9 show cause, with 31 percent subsequently denied
10 or withdrawn accreditation. It's significant to
11 note, however, that in most instances, a show cause
12 directive served as a wake-up call that prompted
13 institutions to improve.

14 One hundred and twelve grants of
15 initial accreditation were awarded, with 13
16 percent of the institutions receiving a five-year
17 grant, 86 percent a three-year grant, and 1 percent
18 a one-year grant.

19 Three hundred and one grants of
20 re-accreditation were awarded, with 35 percent of
21 the institutions receiving a five-year grant, 65
22 percent a three-year grant, and less than 1 percent

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1 a one-year grant. A majority of institutions
2 awarded grants of accreditation were initial
3 deferred for at least one cycle. This allowed
4 institutions to take the actions necessary to
5 demonstrate compliance. Thirty-seven follow-up
6 visits were directed by the commission, including
7 announced and unannounced visits, often to
8 investigate student complaints against the
9 institution.

10 ACCET strives to ensure positive
11 student outcomes, moderate and balanced growth,
12 and financial stability at its member institutions
13 through its annual reporting requirements and
14 regular review process. To augment these efforts,
15 ACCET established, in 2016, a process to
16 systematically monitor potential risk factors.

17 A potential risk factor analysis and
18 summary with 14 potential risk factors identified
19 are prepared at each commission meeting. The
20 analysis identifies, for all ACCET institutions,
21 not just those on the commission agenda, whether
22 each institutions has any potential risk factors.

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1 The risk analysis provides another tool
2 for monitoring institutions, ensuring consistent
3 data-driven decision making by the commission and
4 providing a holistic view of the health of ACCET's
5 membership. It's significant to note that two
6 thirds of ACCET's institutions had no potential
7 risk factors, based on an analysis prepared for
8 the December 2018 commission meeting. To improve
9 program and institutional quality, ACCET provides
10 enhanced training opportunities to member
11 institutions through webinars and online training
12 modules, accreditation workshops and conferences,
13 and commission guidance through new and revised
14 policies and detailed -- very detailed commission
15 letters.

16 ACCET's standards and policies allow
17 for innovation amongst its very diverse
18 membership, including institutions that offer
19 short programs, such as test prep courses,
20 certification and licensing training, computer
21 boot camps, professional development and
22 leadership training, and the didactic portion of

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1 apprenticeship programs.

2 ACCET has standards that are applicable
3 to all institutions, as well as additional
4 requirements for specific types of programs, such
5 as interactive distance learning, occupational
6 associate degrees, practical nursing, and English
7 for speakers of other languages. Currently, ACCET
8 is in the beginning stages of developing
9 requirements for competency based education.
10 Now, my colleague, Linsay Oakdon, will discuss
11 student success.

12 MS. OAKDON: Thanks, Judy. I'm the
13 assistant executive director at ACCET, and I'll
14 be presenting a summary of how ACCET measures
15 success regarding student achievement. Student
16 achievement, particularly completion and job
17 placement, is a cornerstone of ACCET review.

18 Since 1989, ACCET has established
19 bright-lines regarding satisfactory student
20 outcomes, specifically requiring 67 percent
21 completion and 70 percent job placement. ACCET
22 criteria dictates that a graduate cannot be

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1 measured as placed until verification is completed
2 to demonstrate 30 days of employment
3 post-graduation in a training-related field.

4 While some fields have external
5 certification or licensure requirements for which
6 ACCET standards apply, it is the students' ability
7 to get and maintain a job after graduation that
8 determines a program's success across all
9 disciplines. Student achievement is reviewed for
10 each institution's individual campuses, programs,
11 sessions, and teaching modalities, to ensure that
12 program variations offered are viable and
13 successful. In addition to annual completion and
14 job placement reporting, on-site evaluation teams,
15 including quality assurance visits, review
16 institutions' completion and job placement rates,
17 verify a sample of completion and placement
18 documentation, and also conduct a sample of
19 placement verification phone calls to those
20 employers to verify training-related employment
21 for 30 days.

22 To address the increase in initial

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1 applicants with larger student populations, in
2 2017, the commission piloted an enhanced
3 verification process for all large campuses,
4 requiring an additional team member dedicated
5 specifically to reviewing placement documentation
6 and conducting those employer phone calls.
7 Additionally, third-party verification may also
8 be directed.

9 For those institutions with programs
10 that fall below the bright-lines established, a
11 programmatic probation is issued, requiring the
12 institution to report on changes made to improve
13 those rates, including possible revisions to the
14 institution's admissions process, curriculum,
15 instructional methodology, satisfactory academic
16 progress checks, student services, and any other
17 area that may impact student outcomes. This
18 holistic approach to improving final outcomes has
19 proven successful for our members across all
20 fields.

21 However, if rates do not improve,
22 additional sanctions may be issued, including

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1 limiting program enrollments and program approval
2 withdrawal. In the past six years, 123 programs
3 were issued a programmatic probation as a result
4 of below benchmark rates, with nine program
5 approvals being withdrawn by the commission as a
6 result of continued below benchmark results,
7 demonstrating that the vast majority -- that's 92
8 percent -- of programs placed on probation show
9 improvement in student outcomes at subsequent
10 commission meetings.

11 Our members do face challenges in
12 achieving our rigorous benchmarks, including
13 fluctuating job markets and maintaining
14 communication with graduates whom are often part
15 of a population in transition. To support our
16 members, ACCET provides online completion and
17 placement webinars, in-house workshops,
18 conference sessions, and routine staff conferrals
19 to review policy and share best practices. As Bill
20 mentioned in his opening remarks, the most recent
21 completion and placement results for calendar year
22 2018 demonstrated an overall completion rate for

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1 all Title IV eligible institutions of 71 percent
2 completion and 75 percent placement. I will now
3 pass this one to Mr. John Shaheen, who will provide
4 a summary of ACCET's complaint review process.

5 MR. SHAHEEN: I am John Shaheen, the
6 associate executive director here at ACCET. If
7 you can endure two minutes of a discussion about
8 complaints, I'll make it as brief as possible.
9 The governing ACCET policy for processing
10 complaints against ACCET accredited institutions
11 includes schools that are in the initial
12 application process.

13 All schools must publish the
14 ACCET-compliant policy and contact information in
15 their catalog and post it in a readily accessible,
16 prominent location at the school. We also have
17 a student page in our website with a direct link
18 to the complaint contact information. We accept
19 complaints from current students and employees,
20 as well as from students or employees that have
21 been separated from the school for up to two years,
22 barring extenuating circumstances. We accept

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1 complaints from other agencies, from members of
2 the public, and from anonymous sources.

3 ACCET also refers or shares complaints
4 with our colleagues at state regulatory bodies,
5 the VA, and directly with the department, as they
6 have also shared and cooperated with us.
7 Complaints can be dismissed if there are no
8 allegations that align with ACCET standards or are
9 too old.

10 They can also be closed without merit,
11 closed with merit, referred to the commission for
12 further action, and/or referred to on-site teams
13 for peer review, which may be in coordination with
14 a scheduled visit, or the commission may schedule
15 or direct a follow-up visit, which can be announced
16 or unannounced.

17 Complaints closed with merits since an
18 institution's last grant are reviewed by on-site
19 visit teams to ensure that resolved issues are
20 still operating within ACCET standards. Here's
21 a quick summary of complaint activity within the
22 five-year period 2013 through 2018. We've

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1 processed 241 complaints, approximately 40 percent
2 were closed with merit, 51 percent without merit.

3 Four percent were referred to the commission at
4 any one time; about 5 percent of complaints remain
5 open.

6 Finally, at each commission meeting,
7 complaints closed with merit are shared with
8 commissioners, included with other risk factors
9 during normal deliberations to further inform
10 accreditation decisions. This concludes our
11 presentation, and we're happy to answer your
12 questions.

13 CHAIR KEISER: Do we have any questions?

14 MS. NEAL: Thank you very much for a
15 very comprehensive overview. Will you just
16 address the complaint issue that was previously
17 addressed by the staffer?

18 DR. LARKIN: Judy, would you like to
19 do that? The most recent complaint issue, the
20 result of which we only found out about yesterday,
21 involved an institution who was denied
22 re-accreditation and who alleged a number of

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1 violations to the department. In a three-month
2 review, the department was able to determine that
3 all of the issues that were raised lacked
4 appropriate merit, with the exception of one where,
5 in a minority of cases, usually for good reason,
6 I might add, we did not meet our own established
7 seven-day deadline of responding to a complainant.

8 We have since started the process to
9 amend that particular policy, and we're going to
10 extend it to 14 business days. It'll be acted on
11 this week. The mitigating circumstances involved
12 in that usually refer to the fact that the complaint
13 that was submitted was a very complicated one.

14 We needed to do due diligence in order
15 to identify the aspects of the complaint that had
16 relevance to our own standards. Sometimes, that
17 just takes a lot longer to do. We recognize that
18 we want to do better about that, and we recognize,
19 also, we need a little bit more time. We
20 self-imposed a deadline that just, when the volume
21 increased, of complaints, we were not always able
22 to meet it.

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1 MS. HENDRICKSON: I might add that in
2 that complaint, there was allegations that the
3 institution was denied due process and that the
4 commission -- I mean the department staff actually
5 came and observed two appeals hearings that were
6 held this month before they made their final
7 determination.

8 CHAIR KEISER: Federico.

9 MR. ZARAGOZA: Thank you for the
10 important work you do in this space. I have a
11 two-part question. The first part is the
12 bright-lines you've established, those measures,
13 those benchmarks, they go back to 1989 and have
14 not been updated.

15 The question there is what are you
16 basing those benchmarks on, and do you periodically
17 go back and review whether maybe they should be
18 adjusted? Then very specifically, I heard the
19 benchmark of job placement. I didn't hear
20 anything on wages. Is that a consideration? Are
21 you considering that, maybe, as an ROI measure down
22 the line?

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1 MS. OAKDON: Great questions. I'll
2 respond to your first question, relative to the
3 specific percentages that are utilized. In 1989,
4 our completion and job placement criteria was
5 established and a review of all of our institutions
6 and program outcomes was taken under consideration
7 at that point. Sixty-seven percent completion and
8 seventy percent job placement seemed like the
9 appropriate benchmarks for our schools, as it
10 required them to push a little harder, but was still
11 attainable.

12 Since that time, these percentages have
13 been reviewed consistently. Our policy requires
14 that we review these on a five-year basis.
15 However, I can tell you, at every commission
16 meeting, these are discussed and considered. In
17 the past ten years that I've been at ACCET, this
18 conversation has come up and it has been determined
19 that the percentages are still appropriate for the
20 programs that are offered at our institutions.
21 The only changes that have been made,
22 significantly, to that policy is the time frame

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1 that we give institutions to report on those
2 outcomes.

3 When I first started, institutions had
4 three months to report on their placement
5 statistics. We have now given them four months.

6 But the percentages, themselves, have held
7 strong, and our institutions are able to meet them.

8 We're quite proud of them. Number two, second
9 question, we do not require our institutions to
10 track graduates' wages once they are employed.
11 What we do require is that those jobs are training
12 related, so they have to align with the objectives
13 in the catalog for which the student graduated from
14 that program, and it must be 30 days to ensure that
15 the student has overcome that first probationary
16 period and is a good indicator that they will
17 maintain that job. Wages have not been a criteria
18 for us, specifically.

19 MR. ZARAGOZA: Just a follow up; are
20 you all looking at methodology somewhere at gainful
21 employment, where you do -- you do? Okay.

22 CHAIR KEISER: Yes.

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1 MS. HENDRICKSON: I might add, a number
2 of our institutions have programs that are approved
3 for job training, so their earnings are tracked
4 through the WIA program and its successors.

5 MR. PRESSNELL: Let me thank all of you
6 for coming. I appreciate, very much, you taking
7 the time to be here and to complete the process.
8 Looking at the dashboard, your success matrix,
9 looking at graduation rates, is very positive.
10 It's very good. The placement rate is very
11 positive. The median earnings, as reported in the
12 dashboard, are low. The vast majority are below
13 \$30,000 a year. I'm wondering if that
14 contributes, as well, to your default rates. I'd
15 like for you to address how you handle that because
16 you've got 20 institutions with cohort default
17 rates above 15 percent.

18 DR. LARKIN: First of all, a reminder
19 that the vast majority of our students are
20 completing diplomas and certificates, with less
21 than 10 percent in the occupational associate's
22 degree area. One would anticipate that our job

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1 levels are going to be lower than many other
2 institutions with higher degrees. The rap,
3 sometimes, that you hear is high school graduates
4 earn the same amount.

5 The difference is that our students are
6 positioned to accept additional responsibility
7 because they've completed certificates and
8 diplomas. That's not necessarily reflected on
9 what you see in the dashboard. Remind me a little
10 bit more of your second question.

11 MR. PRESSNELL: It's really around the
12 cohort default rates. They seem to be pretty high,
13 so I'm wondering -- I know that not all your member
14 institutions participate in Title IV. Do all of
15 your Title IV participants participate in the loan
16 programs?

17 DR. LARKIN: No.

18 MR. PRESSNELL: They don't, okay. Can
19 you talk, though, about especially those with a
20 15 percent cohort default rate and higher, and
21 you've got 20 institutions in there. How are you
22 engaging them on this issue?

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1 DR. LARKIN: We engage them through our
2 own conference workshops and particularly during
3 our visits, at which time we talk about the
4 enrollment process. We don't talk about -- we
5 don't discuss with them just merely whether or not
6 they do entrance orientation, because obviously,
7 that's required, but what the content of it is and
8 what the emphasis of it is.

9 We have a good amount of discussion
10 about default rates with institutions. It is one
11 of our risk factors. We do monitor it. We look
12 at it in our annual reporting. We don't just limit
13 it to our quality assurance visits and to our
14 re-accreditations. Indeed, as you know, we're
15 talking about a national crisis, as far as this
16 is concerned. As accreditors, we're trying to do
17 our best to promote awareness and to encourage our
18 institutions to do as much as they possibly can
19 up front, in order to address a most challenging
20 situation.

21 MS. HENDRICKSON: I might add, we also
22 look for default management plans, and we look at

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1 default rates when we do on-site visits. It is
2 one of the potential risk factors. At the moment,
3 we have no institutions that are hitting the 30
4 percent rates for three consecutive years or 40
5 percent for one year.

6 CHAIR KEISER: Kathleen.

7 MS. ALIOTO: I wondered about -- when
8 you say that you have a 75 percent placement for
9 30 days, do you have any indication of beyond 30
10 days?

11 MS. OAKDON: The placement percentage
12 is 70 percent that we require for all graduates.

13 Our 30 days was established so that we could feel
14 assurance that students would continue for that
15 30 days. They've overcome that probationary
16 period with their employer. They've shown up to
17 work. There's a good chance they will continue.

18 Many of our institutions have self-imposed 60 and
19 90-day checks, as well; however, we only require
20 that 30 days.

21 MS. ALIOTO: Why?

22 MS. OAKDON: A lot of our institutions

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1 offer programs for entry-level employment. That
2 30 days is, again, a good indicator that those
3 students will stay with that program for maintained
4 employment.

5 DR. LARKIN: I might add, also, that
6 there are a number of other agencies that don't
7 even require 30 days.

8 MS. ALIOTO: I think it's great that
9 you do. President LeBlanc was talking about how
10 difficult it is to gather that kind of information.

11 I think it's wonderful that you do. If we're
12 serious about it, 30 days might not really -- I
13 could last in a job for 30 days.

14 MR. SHAHEEN: Perhaps I can give you
15 a little bit of comfort. On every on-site visit,
16 we spend about half a day -- at least one of our
17 professional staff spends about a half day calling
18 employers. We call graduates as a second step,
19 but we call the employers first. As part of that
20 interview, we ask them how long the graduate has
21 been with them, what they're doing, how well
22 prepared they were, if they're still with them or

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1 if they've moved on. We have a number of
2 schools -- many of our institutions have a very
3 fine pipeline, with externship to hire
4 rates -- with very high externship to hire rates.

5 They are following through a pipeline
6 of entry level, and then up, and often out. Thirty
7 days seems to be a good mark. Our feedback from
8 the employers, by and large -- I've spoken to lots
9 and lots of employers on lots and lots of visits
10 who rely on this pipeline.

11 They're very satisfied with the
12 graduates. One of the questions we ask
13 specifically, are you satisfied with the
14 graduates, how well prepared they were when they
15 came here? Do you have any recommendations for
16 the school, what they should be doing differently?

17 That kind of feedback informs us. I
18 think it's a pretty reliable measure, without
19 going -- again, with a transient population, the
20 longer you go, the less reliable the statistics
21 become.

22 CHAIR KEISER: Simon.

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1 MS. ALIOTO: Thank you.

2 MR. BOEHME: Thank you so much for
3 coming and your presentation. If I heard
4 correctly, you don't track wages.

5 MS. OAKDON: We do not require our
6 institutions to track the wages of graduates.

7 MR. BOEHME: This question kind of ties
8 in with Claude is the repayment. Of course, you
9 all are more than aware of the national crisis
10 within that. I guess one thing that I find -- Third
11 Way, a think tank, came out with some information
12 that -- it sounds like 18 out of 22 of your
13 institutions show that the majority of their
14 students -- of course, with the given data, which
15 is very limited -- \$28,000 or less per year, which
16 I think feeds into this repayment.

17 Of course, the many industries or jobs
18 have varying levels of salaries. I'm curious,
19 though, if, within your roadmap as an organization,
20 you do plan to track that, try to get more
21 information to kind of supplement the current data
22 that we have?

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1 DR. LARKIN: I think it's a good
2 observation. It's been a discussion point amongst
3 staff. I think raising it to the level of
4 commission discussion is certainly appropriate.

5 We appreciate you bringing it to our attention.

6 MR. BOEHME: Thank you.

7 CHAIR KEISER: I have a question. In
8 listening to your presentation, it just seemed to
9 be that you had a lot of -- a great percentage of
10 your institutions in a negative environment, much
11 higher than most of the agencies. Is there a
12 reason for that?

13 You can say you're tougher, or could
14 you say that your institutions aren't being trained
15 in the process? Why would you have such a high
16 percentage of either federal grants or put on
17 probation or on show cause, as you went through
18 that litany of negative actions you've taken?

19 MS. HENDRICKSON: I can speak to that,
20 to some extent. We've had two bubbles. One is
21 in 2010, there was a requirement -- federal
22 requirement that language schools be accredited.

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1 We had a large number of institutions that came
2 to us that had been operating without
3 accreditation. A significant number of those
4 denials in the last six years have been language
5 schools that weren't able to meet the asset
6 accreditation requirements. Then, of course, the
7 other thing that's happened during this time frame
8 is the ACICS issue. Some of those institutions
9 came to us and were denied, as well.

10 CHAIR KEISER: Any other questions?
11 Thank you very much. Are there any third-party
12 commenters? No? Okay, Valerie, come on back.
13 Would you have anything to add or --

14 MS. LEFOR: I have nothing additional.

15 CHAIR KEISER: Are there any questions
16 to Valerie? Wow. Okay. Anne, would you like to
17 make a motion?

18 MS. NEAL: I'd be happy to make a
19 motion. I think, as this body knows, I rarely say
20 anything nice about accreditors, but I do think
21 that ACCET has repeatedly come in with very
22 comprehensive and impressive reports.

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1 I appreciate your thorough responses
2 today and your willingness to respond to various
3 issues by the NACIQI members. Thank you very much
4 for that. I will move that NACIQI approve the
5 staff recommendation to renew the agency's
6 recognition for five years.

7 CHAIR KEISER: Is there a second?

8 MR. LEBLANC: Second.

9 CHAIR KEISER: Second by Paul.
10 Further discussion? Sensing none, all in favor
11 of the motion raise your hand, please.

12 (Show of hands.)

13 CHAIR KEISER: All opposed.

14 (Show of hands.)

15 CHAIR KEISER: Wow, congratulations,
16 especially coming from Anne, that's a big, big
17 congratulations. I think, at this point, we are
18 scheduled for lunch. Is that right? We will
19 return at 1:00 p.m. We'll be looking at the
20 American Veterinary Medical Association.

21 (Whereupon, the above-entitled matter
22 went off the record at 11:44 a.m. and resumed at

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1 1:00 p.m.)

2 CHAIR KEISER: We are now going to be
3 reviewing the renewal of recognition for the
4 American Veterinary Medical Association's Council
5 on Education. Our primary readers are
6 Paul -- where is Paul?

7 VICE CHAIR WU: He's not back yet, so
8 we can't quite start.

9 CHAIR KEISER: You're right. And Frank
10 Wu, who is here.

11 Here he comes. Paul, you're up. The
12 primary readers are Paul LeBlanc and Frank Wu.
13 Frank, maybe you can lead off or start?

14 VICE CHAIR WU: Paul has extensive
15 notes.

16 MR. LEBLANC: Thank you.

17 CHAIR KEISER: Could you -- your
18 microphone, please.

19 MR. LEBLANC: Next before us is the
20 American Veterinary Medical Association, which has
21 been around for a long time, since 1863, and started
22 being involved in accreditation activities in

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1 1906. They accredit 28 schools of veterinary
2 medicine. They're all regionally accredited.
3 They're actually -- though it's not pertinent to
4 our conversation -- also accredit five Canadian
5 institutions, and it looks like another 15, I
6 think, international institutions. Again, not
7 relevant to this; we're only dealing with the
8 American schools. The programs that are
9 accredited by AVMA are using that accreditation
10 to participate in the health profession student
11 loan program, which is through Health and Human
12 Services.

13 There are no Title IV funded programs
14 through AVMA. In 2016, they were extended for a
15 period of one and a half years and appear before
16 us today. That's the broad introduction.
17 Nicole, you were the department staff person
18 assigned, so do you want to take it away?

19 DR. HARRIS: Yes, thank you. Good
20 afternoon, Mr. Chair and members of the committee.

21 For the record, my name is Dr. Nicole S. Harris,
22 and I will be presenting information regarding the

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1 renewal petition submitted by the American
2 Veterinary Medical Association, also referred to
3 AVMA or the agency.

4 It should be noted that the AVMA was
5 scheduled to appear before NACIQI at its winter
6 2019 meeting, February 5, 2019. However, the
7 meeting was canceled due to the lapse in
8 appropriation. Nevertheless, Department staff
9 completed the review of the Agency's petition for
10 recognition and provided the Agency with a draft
11 staff analysis in the required response time.
12 Department staff also provided the agency with a
13 final report and made that report available to the
14 public.

15 Further, third-party comments were
16 requested, reviewed, and analyzed as part of the
17 department staff's review of the agency's petition
18 for recognition, in preparation for the winter
19 meeting. The staff recommendation to the senior
20 department official is to renew the agency's
21 recognition for five years.

22 The staff recommendation is based upon

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1 my review of the agency's renewal petition,
2 additional information requested, and supporting
3 documentation, as well as observations of multiple
4 program site visits conducted by the agency in
5 August and October of 2018 and an AVMA council
6 meeting and training in September 2018. During
7 the accreditation cycle, the Department received
8 ten third-party comments recommending the
9 continued recognition of the agency. The
10 commenters were all external constituents of the
11 agency expressing support of the agency's rigorous
12 standards that assure that accredited colleges and
13 schools of veterinary medicine produce qualified
14 veterinarians. Also, there have been no
15 complaints submitted to the Department during this
16 recognition period for the agency.

17 In the ASL system, unfortunately, it
18 was a glitch and didn't remove the typo in the
19 system, so if it's contradictory, I just wanted
20 to go on the record to make it clear they had no
21 complaints.

22 Therefore, and as I stated previously,

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1 the staff recommendation to the senior department
2 official is to renew the agency's recognition for
3 five years. There are agency representatives
4 present today, and we will be happy to answer the
5 committee's questions. This concludes my report.

6 Thank you.

7 MR. LEBLANC: Nicole, just for
8 clarification, I think we listed 28 schools. I
9 think I counted 30, so just clarification from the
10 representatives when they come --

11 (Simultaneous Speaking)

12 MR. LEBLANC: -- since the last visit
13 because it's been a while. Just to clarify, there
14 have been no changes in policy since the last
15 renewal. I think I read through all those.
16 Everything remains the same. There have been no --

17 CHAIR KEISER: But policies weren't
18 changed. It was just clarification and
19 documentation provided supporting the policies
20 they had established.

21 MR. LEBLANC: Yes. You wouldn't put
22 it this way, but I might say a lot of what brought

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1 them in compliance was documentation and what I
2 might call housekeeping, as opposed to any
3 substantial changes in policy or changes from the
4 last renewal.

5 DR. HARRIS: Correct.

6 MR. LEBLANC: Thank you.

7 CHAIR KEISER: Thank you, Nicole.

8 Will the members from the agency please come
9 forward and introduce yourselves?

10 DR. JOHNSTON: Mr. Chair, members of
11 the committee, thank you for the opportunity to
12 speak on behalf of the American Veterinary Medical
13 Association, Council on Education, also referred
14 to as the AVMA-COE. My name is Dr. Spencer
15 Johnston, and I professor of small animal
16 orthopedic surgery and department head of small
17 animal medicine and surgery at the University of
18 Georgia's College of Veterinary Medicine. I am
19 completing my fifth year as a member of the council,
20 currently serve as the vice chair, and am the
21 incoming chair of the council.

22 With me today, on my left, is Dr. Kevin

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1 Donnelly, research advisor, Eli Lilly and Company.

2 Dr. Donnelly is completing his fifth year and is
3 the incoming vice chair of the council. Also
4 representing the American Veterinary Medical
5 Association today is Dr. Karen Brandt, to my right.

6 She is the director of education and
7 research division of the AVMA and the principal
8 staff support for the council. The AVMA-COE
9 accredits doctor of veterinary medicine, also
10 known as DVM, and its equivalent degree programs.

11 The DVM is the entry-level degree for
12 the practice of veterinary medicine and is accepted
13 as meeting the educational requirements for
14 licensure in all of the United States and
15 territories. We would like to express our
16 appreciation to Dr. Nicole Harris for her
17 thoughtful review and guidance provided in the
18 development and submission of our petition. The
19 council is committed to quality veterinary medical
20 education in the United States and ensuring
21 programs provide a solid basis for graduates to
22 enter the profession. Modern day veterinary

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1 graduates are equipped with the skills and
2 knowledge to pursue a diverse array of career
3 activities.

4 These diverse career options include
5 clinical practice with a variety of species,
6 ranging from dogs and cats to horses and cows, to
7 birds and rodents, researching ranging from
8 molecular techniques to whole animal
9 investigation, to public health, and other
10 non-clinical options relating to animal and human
11 health, including a major role in the One Health
12 initiative.

13 These skills allow the veterinary
14 medical profession to meet the grand needs of
15 society. The council has one bright-line standard
16 it uses to assess student achievement. That is
17 the pass rate on the North American Veterinary
18 Licensing Exam, also referred to as the NAVLE, the
19 exam that a veterinarian must pass for licensure
20 in the United States. If a college does not meet
21 the expected pass rate for two successive years,
22 a college will be placed on probationary

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1 accreditation. One college was placed on
2 probationary accreditation in the last five years
3 for this reason and has seen significant
4 improvement in the overall pass rate.

5 Over 98 percent of 2018 graduates of
6 U.S. veterinary medical colleges sat for the NAVLE,
7 and 97 percent of them have passed the NAVLE by
8 the time they graduate. Each college is required
9 to submit the school score report from the
10 International Council for Veterinary Assessment,
11 who administers the NAVLE to the -- they submit
12 that to the council with their annual report.

13 The council regularly reviews the NAVLE
14 pass rate expected of colleges. In addition to
15 the bright-line standard, the council also
16 requires that every college assess each student's
17 achievement of nine clinical competencies, which
18 were developed with input from stakeholders.

19 Those competencies are regularly
20 reviewed. If a student does not achieve one or
21 more of the competencies when assessed, the college
22 must have a process in place to provide remediation

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1 for the students. Colleges must also gather input
2 from graduates and employers to measure student
3 success in the achieving of entry-level
4 competence.

5 The council receives an annual report
6 from a college to assess continued compliance with
7 the standards and, based on that report, may change
8 accreditation standard of the college, status of
9 the college. Colleges must provide any changes
10 that have the potential to impact the standards
11 of accreditation.

12 Student absolute attrition and one year
13 post-graduation employment rates are also
14 monitored to identify colleges that may be at risk.

15 Student absolute attrition is less than 5 percent,
16 and often 1 to 3 percent. Data collected from
17 students near graduation in the 2018 AVMA senior
18 survey showed that greater than 90 percent of
19 students had a job offer or were seeking further
20 specialized training.

21 Colleges who fail to comply with all
22 elements of the standards initiate the two-year

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1 compliance time frame and provide a plan on how
2 any deficiencies will be corrected to the council.

3 These colleges are required to submit reports
4 twice a year until the deficiency is corrected.

5 The most commonly cited standards are those
6 related to physical facilities, curriculum
7 assessment and review, and outcome assessment.

8 The AVMA-COE offers resources to assist
9 colleges, including consultation with the council
10 and/or staff, and for proposed new programs, a
11 consultative site visit, which would provide an
12 unofficial report to the college on its readiness
13 for accreditation.

14 Colleges who fail to come into
15 compliance within a two-year time frame face an
16 adverse action, unless a good cause extension is
17 granted. While no college has had accreditation
18 withdrawn, the council has made an adverse decision
19 in the last recognition cycle.

20 The plan for a proposed new veterinary
21 medical college was considered by the council,
22 determined to not be sufficient, and a letter of

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1 reasonable assurance, which is required to offer
2 and admit an inaugural class, was denied. The
3 council is committed to continuous quality
4 improvement for not only the veterinary medical
5 colleges it accredits, but also its own process
6 in the standards. To gather stakeholder input,
7 the council holds a session annually at a major
8 veterinary conference, including the annual
9 student symposium, to listen to stakeholder
10 feedback. This is in addition to newsletter and
11 requests for feedback from stakeholders on
12 standard revisions. Thank you for allowing us to
13 comment, and we look forward to your questions.

14 MR. LEBLANC: Thank you very much.
15 Could you just clarify my one point of information?
16 Is it 28, or is it 30? Am I miscounting?

17 DR. JOHNSTON: It is 30.

18 MR. LEBLANC: It is 30; thank you. I
19 was going to have to do some major math. Could
20 you say a little bit about debt and earnings? You
21 mentioned job placement rates. I was trying to
22 get accurate information. I see various reports,

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1 but in 2016, I saw average debt of about \$167,000,
2 20 percent over \$200,000.

3 I've seen various reports on average
4 earnings, AVAK median of \$124K. I compliment the
5 AVMA with its veterinary debt initiative,
6 veterinary economic report, which is on the parent
7 website. Nicole said that this is something she
8 heard lots of conversation around. Could you just
9 say a little bit about how you're thinking about
10 this? We had a pretty vigorous conversation with
11 the ABA around law schools and the amount of debt
12 and earnings.

13 DR. JOHNSTON: Yes, as you accurately
14 state, debt is a large concern within the
15 profession. It is being addressed largely as a
16 professional issue, through the work of the AVMA,
17 also the American -- the AAVMC, as well, and the
18 AA --

19 DR. BRANDT: Association of
20 American -- American Veterinary Association
21 executives. It's multiple organizations.

22 DR. JOHNSTON: Multiple organizations

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1 addressing it. It certainly is a concern. As far
2 as it being an issue for accreditation, the way
3 that it has been addressed is that there are
4 requirements for financial literacy that are
5 within -- embedded within the standards, actually
6 within multiple standards.

7 It's not a single standard. When we
8 do accreditation visits, we make sure that we are
9 looking at that issue, looking at the continuing
10 education and awareness of our graduates, so that
11 they're prepared to enter the workforce.

12 MR. LEBLANC: Do you ask schools to
13 report to you any analysis around debt and earnings
14 for their graduates?

15 DR. JOHNSTON: The schools,
16 themselves, do not provide that information to us.
17 We get that through the profession, through the
18 professional organizations. I believe that is
19 largely voluntary information that's provided by
20 the graduates.

21 MR. LEBLANC: One of the ways that I
22 think, in our industry, generally speaking, people

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1 are thinking about how to get a handle on costs,
2 costs of delivery and costs to students, is around
3 innovation. I'm curious about the ways you think
4 you support innovation. Do you have examples of
5 this?

6 Are the standards such that schools can
7 come to you? I'm curious about the adverse action.

8 What are you responding to, and do you have an
9 ongoing conversation with that entity that's
10 submitted? In other words, do you give them
11 counsel on how to come back to you?

12 DR. JOHNSTON: Regarding the financial
13 literacy, no, we don't give them specific advice.

14 There is the standard that they have to meet, which
15 is that financial literacy is part of one of the
16 standards, but as far as --

17 MR. LEBLANC: Excuse me. Forgive me
18 for interrupting, but I think I was unclear. What
19 I'm asking is do you -- when we look at the ways
20 in which institutions are innovating around
21 bringing down costs, it really means innovating
22 in their delivery models, oftentimes in

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1 specialized accreditation.

2 Some would argue that there's less
3 space for that kind of innovation. I'm curious
4 about how you think about encouraging your members
5 to innovate around the delivery of their programs
6 and the cost of programs.

7 DR. JOHNSTON: With respect to the
8 programs, again, we go back to the bright-line
9 standard of the NAVLE pass rate. There's many ways
10 that they can do that, but with respect to the costs
11 of the program, there is Standard 2, which is the
12 financial component. They have to be financially
13 solvent. But with respect to specific advice from
14 the council as to how they go about achieving that,
15 no, we are not prescriptive.

16 DR. BRANDT: If I could just add, the
17 council tries real diligently to not make its
18 standards highly prescriptive. By making those
19 standards open and non-prescriptive -- which
20 sometimes bothers some colleges because it may say
21 sufficient access to this -- it allows colleges
22 to do things in different ways.

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1 For example, there have been some very
2 interesting partnerships that have been developed
3 in veterinary medicine between shelters and
4 veterinary schools, where veterinary schools will
5 have a faculty member who's actually embedded into
6 a shelter.

7 So they send their students there. The
8 students get experienced in surgical experience,
9 but they also get -- in some of those, they also
10 get the opportunity to learn to work with clients
11 who are low-income clients, so they're learning
12 to see a potentially different spectrum of clients.

13 They also learn shelter medicine, which
14 is a little bit different type of medicine than
15 you would see in clinical practice. They get to
16 see some things that they might not see in clinical
17 practice and get an opportunity, sometimes, to deal
18 with some behavior issues that would be unique to
19 a shelter. That's one example where colleges have
20 been -- tried to be innovative and try ways to
21 deliver the curriculum and not have an extreme
22 amount of cost to it.

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1 MR. LEBLANC: Thank you.

2 DR. DONNELLY: You had a second part
3 of your question, if I can address. The
4 institution, in 2016, that came upon an adverse
5 decision. To a certain extent, their financial
6 arrangement was built into that decision, but
7 absent an openness to innovation, that program has
8 been through an appeals process and is re-applying
9 for accreditation. They're going to work within
10 an innovative model that will make that meet the
11 standards, even if it's unique.

12 MR. LEBLANC: Thank you. You both
13 answered my question. Frank.

14 VICE CHAIR WU: I was here when you last
15 appeared. There were some concerns expressed by
16 members of the profession. Congratulations.
17 That seems to have calmed down. I have a question
18 that's an entirely friendly, open-ended question,
19 which is how did you resolve matters and address
20 this? It was around foreign institutions,
21 potentially online programs, that sort of thing.
22 The waters seem to have settled, so from your

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1 perspective, that's great. I wonder if you wanted
2 to share a little bit about the progress made there?

3 DR. JOHNSTON: With respect to that
4 issue, you're absolutely correct. There has been
5 a lot of quieting of the entire situation. Some
6 of that was related, probably, to the economic
7 situation at the time. There was a lot of concern
8 where there was going to be an overabundance of
9 veterinarians.

10 That has since proven not to be true.

11 In fact, now, the most frequent thing we hear is
12 that people have difficulty hiring veterinarians.

13 There's actually a shortage. Some of the fears
14 for a school outside the United States, that there
15 was going to be -- essentially that we were going
16 to be inundated with graduates from that
17 school -- have simply proven not to be true.

18 The statistics show that there are
19 actually very, very few individuals from that
20 school who have even sought licensure in the United
21 States. I believe that's basically what has
22 happened.

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1 VICE CHAIR WU: It's good to see.
2 Great.

3 MS. ALIOTO: Going on President
4 LeBlanc's question about innovation, do you have
5 any training for your members who are not
6 innovating, not being prescriptive, but training,
7 it's a different thing?

8 DR. JOHNSTON: No, we do not have
9 training for the member schools regarding
10 innovation.

11 MS. ALIOTO: Why can you not? Other
12 agencies do. They're helping their members
13 succeed.

14 DR. JOHNSTON: I believe the member
15 organizations are actually -- do quite a good job
16 of being innovative in their own right. But we
17 do not -- with any of our standards, we try not
18 to be prescriptive regarding how they go about
19 doing.

20 Veterinarians, on the whole, are
21 generally a pretty innovative group. When we look
22 at all the various member institutions, they come

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1 up with their own solutions and have
2 largely -- using our outcome measures, have largely
3 been successful in being able to do that.

4 MS. ALIOTO: Do you ever bring your
5 various members together for --

6 DR. JOHNSTON: As the Council on
7 Education, no.

8 MS. ALIOTO: Thank you. Too bad.

9 CHAIR KEISER: Any further questions?

10 MR. LEBLANC: But the AVMA does have
11 an annual meeting --

12 (Simultaneous Speaking)

13 DR. JOHNSTON: Yes. The AVMA has an
14 annual meeting, and also another organization, the
15 American Association of Veterinary Medical
16 Colleges has an annual meeting, as well. There
17 is plenty of opportunity for various colleges to
18 interact.

19 CHAIR KEISER: I think because of lack
20 of questions, we should have all of our meetings
21 after lunch. Simon, do you have a question? No?
22 Thank you very much for coming before us. We

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1 appreciate it. Are there any third-party
2 commenters, like last time? Thank goodness.
3 Staff, would you like to come back? Nicole?

4 DR. HARRIS: I have nothing further to
5 add.

6 CHAIR KEISER: Wow. Great. Do you
7 have a question for the staff?

8 MR. LEBLANC: No, I'm prepared to make
9 a motion, actually.

10 CHAIR KEISER: That'd be great. I'd
11 entertain it.

12 MR. LEBLANC: I do so and would say to
13 the representatives who traveled here, please
14 don't take the lack of more discussion as anything
15 but a compliment to the excellent performance and
16 its members. It's a pretty impressive group and
17 impressive performance. I move that NACIQI
18 recommend that the American Veterinary Medical
19 Association recognition be renewed for five years.

20 VICE CHAIR WU: I second.

21 CHAIR KEISER: Second by Frank Wu.
22 Further discussion? I'm telling you, lunch is a

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1 great thing. All in favor of the motion, signify
2 by raising your hands.

3 (Show of hands.)

4 CHAIR KEISER: All those opposed.

5 (Show of hands.)

6 CHAIR KEISER: Motion carries. Thank
7 you very much, and congratulations. That was
8 easier than last time. Okay, we move now to the
9 renewal of recognition for the Council on Education
10 for Public Health. The primary readers are
11 Richard O'Donnell and Ralph Wolff. Stephanie is
12 our staff member. Stephanie, it's your floor.
13 Actually, I did skip a step. Ralph or Rick, who
14 would like to make the initial -- the other one
15 was so simple, it just threw me off.

16 MR. WOLFF: I have some notes here.
17 Let me find them. The Council on Education for
18 Public Health is actually a combination or
19 partnership with three agencies, the American
20 Public Health Association and the Association of
21 Schools of Public Health.

22 It's a programmatic accrediting

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1 agency, accrediting 50 schools of public health,
2 92 separate public health programs in 45 states,
3 Puerto Rico, and D.C. D.C.'s not a state yet.
4 Let's see. It does not need to meet the separate
5 and independent requirement, which enables it to
6 have these relationships with the other
7 associations.

8 Not Title IV eligible, but it achieves
9 its eligibility through Title VII of the Public
10 Health Services Act. It's recognized since 1974,
11 and its last review was in 2013. I hope that's
12 reasonably accurate. Thank you, Stephanie.

13 MS. MCKISSIC: Good afternoon, Mr.
14 Chairman and members of the committee. For the
15 record, my name is Stephanie McKissic, and I will
16 be presenting a summary of the petition for
17 continued recognition by the Council on Education
18 for Public Health, hereafter referred to as CEPH
19 or the agency.

20 CEPH was scheduled to appear before the
21 NACIQI at its winter 2019 meeting, on February 5,
22 2019, but due to the lapse in appropriations, the

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1 meeting was canceled. Nevertheless, department
2 staff completed the review of the agency's petition
3 for continued recognition, observed a site visit
4 at the Texas A&M School of Public Health in October
5 2018, and attended a council meeting in June 2018.

6 Department staff also provided the
7 agency with a draft staff analysis, and the agency
8 was given the required response time. The agency
9 received the final report, which was also made
10 available to the public. Third-party comments
11 were requested as part of the department staff's
12 review of the agency's petition for recognition
13 in preparation for the winter 2019 meeting. There
14 were no written third-party comments or active
15 complaints submitted regarding this agency during
16 the winter review period. The agency meets the
17 requirements of the Secretary's criteria for
18 recognition, and staff recommends to the senior
19 department official to continue the agency's
20 current recognition for a period of five years.

21 This concludes my report for the
22 Council on Education for Public Health. A member

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1 of the agency is present today to answer any
2 questions you may have at this time. Thank you.

3 CHAIR KEISER: Thank you, Stephanie.

4 MS. MCKISSIC: Thank you.

5 DR. KING: Good afternoon, Mr.
6 Chairman and members of the committee. My name
7 is Dr. Laura Rasar King, and I'm the executive
8 director of the Council on Education for Public
9 Health.

10 First, I would like to thank Dr.
11 Stephanie McKissic, our staff analyst, for her
12 thorough, collegial, and professional review of
13 our agency. It's been a pleasure to work with her
14 during this process. I would like to briefly
15 address the activities of our agency since the last
16 review, in 2014, as well as our approach to student
17 achievement and program improvement. Then I would
18 be happy to answer any questions that you have.

19 The Council on Education for Public
20 Health currently accredits public health programs
21 in 204 institutions. Each of these 204 public
22 health units offer some combination of bachelor's,

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1 master's, and doctoral degrees in many
2 concentration areas, ranging from biostatistics
3 and epidemiology to health promotion and global
4 health.

5 Our field continues to experience rapid
6 growth. From 2014 to 2018, our agency has
7 conferred 58 initial accreditations and
8 re-accredited 113 programs. The agency has
9 conferred probationary accreditation five times.

10 Of those, three have been successfully
11 re-accredited, remedying all cited issues, and the
12 other two have not yet had site visits following
13 the probationary decision. Over the years, we
14 have had excellent success in using probation, as
15 well as intensive education and technical
16 assistance, to increase the urgency around program
17 improvement and to bring those programs into full
18 compliance. True to our public health philosophy,
19 we employ prevention as a strategy to ensure that
20 programs are successful. In a rapidly growing
21 field, we do not rush initial accreditation.

22 Applicants for initial accreditation

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1 have a high bar to entry, with many potential stop
2 points. Potential applicants work extensively
3 with staff to ensure that they meet minimum
4 outcomes, like faculty support, curriculum
5 development, and success with respect to student
6 achievement, before they're considered by the
7 council to enter a period of applicant status.

8 Once accepted, applicants continue to
9 work with staff during their two-year applicant
10 period. If, during that time, the staff and the
11 council determine that they will not be able to
12 successfully meet the standards, they may have
13 their initial site visit postponed for up to two
14 years, at their request or ours, until they are
15 able to fully meet the standards. During the last
16 five years, the council denied 16 applications and
17 has granted 46 extensions of applicant status,
18 typically by one year at a time. Nine accepted
19 applicants withdrew from the process because it
20 was going to take them more time to be successful.

21 Generally, they come back when they're ready.

22 This vigilance at the beginning ensures

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1 that when programs are initially accredited,
2 they're clear in their expectations and meeting
3 the standards. We believe that this prevents
4 denials, probationary decisions, and withdrawal
5 of accreditation in later years.

6 In addition to careful guidance at the
7 beginning, we monitor our accredited programs
8 extensively throughout their terms of
9 accreditation and, in doing so, we're able to
10 quickly identify those that may be at risk.

11 Annually, each of our accredited
12 programs submits a report that collects key
13 indicators related to faculty resources, fiscal
14 and other resources, enrollment numbers,
15 graduation rates, post-graduation outcomes, and
16 any organizational or administrative changes that
17 may have occurred. Comprehensive reviews,
18 including a site visit, are conducted five years
19 after an initial review and every seven years in
20 subsequent reviews. Concerns about any standard
21 in either the comprehensive review or the annual
22 report can, and often does, trigger interim

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1 reporting to monitor specific issues. Over the
2 last five years, the council has reviewed between
3 40 and 70 interim reports per calendar year.

4 These are most often on single discrete
5 issues requiring improvement. The most
6 frequently cited issue since our last review, in
7 2014, include those related to curriculum. The
8 agency adopted new curricular standards, requiring
9 a massive overhaul of the core curriculum and all
10 programs at the end of 2016, which accounts for
11 much of that bump.

12 Ongoing program evaluation is another
13 issue, as well as data collection issues, and
14 graduation rates in some programs falling below
15 the established thresholds.

16 Our agency addresses the Secretary's
17 criterion about success with respect to student
18 achievement in the following ways, but it's
19 important to note that none of these indicators,
20 by itself, tell the whole story. We look at them
21 in a holistic way, both qualitatively and
22 quantitatively, to make a complete assessment.

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1 First, we require that all units develop guiding
2 statements, meaning vision, mission, goals, that
3 explicitly address their approach to ensuring
4 student success. We look at student competency
5 attainment.

6 For example, MPH programs must assess
7 students on 12 foundational knowledge components,
8 22 foundational competencies, and at least five
9 concentration-specific competencies. We look at
10 those assessments carefully. We look at cohort
11 graduation rates, post-graduation outcomes
12 related to both employment and further education
13 goals.

14 We look at student experience
15 indicators, including overall satisfaction, as
16 well as requirements for discipline specific and
17 career mentoring.

18 In addition, and sometimes even more
19 helpful, we look at alumni perceptions and require
20 all of our programs to collect data on alumni
21 perceptions of the preparation that they received
22 at the programs and its helpfulness in their

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1 careers. Given the department's new
2 understanding of graduation rates and their
3 difficulty as an indicator when used as a single
4 bright-line measure of success for all types of
5 institutions, the council's begun to further
6 analyze and stratify our graduation rate data and
7 to consider approaches that take this into account
8 in the context of individual programs and
9 universities.

10 This work is ongoing. As I mentioned
11 previously, my agency is in close contact with
12 programs that we accredit, both formally, through
13 systematic reporting, and informally, through
14 collegial relationships with program directors and
15 deans, so that at-risk programs are easily
16 identified by my staff and brought to the attention
17 of the council.

18 One of the strategies that we employ,
19 which may be unique compared to other specialized
20 agencies, is that we provide a vast array of
21 technical assistance opportunities for program
22 leaders and other program faculty and staff, not

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1 only to assist them with the accreditation process,
2 but to disseminate best practices in education.

3 We do this through providing in-person
4 conferences, workshops and trainings, a webinar
5 series, and by offering in-person and web-based,
6 both one on one and small group consultation visits
7 to programs. While available to all applicant and
8 accredited programs, the council often requires
9 programs to avail themselves of this assistance
10 when deemed at risk. All of these resources are
11 on our website and advertised through our weekly
12 newsletter and are very well attended.

13 For example, in 2018, nearly 95 percent
14 of our accredited programs attended at least one
15 of these offerings. Online events are our most
16 popular. The council and staff at CEPH are
17 committed to the success and quality of the
18 programs that we accredit and the graduates that
19 they produce.

20 We're also committed to monitoring our
21 own performance and holding ourselves to a high
22 standard of quality as an agency. I would welcome

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1 any questions that you have.

2 MR. WOLFF: First, thank you for the
3 presentation and for a very thorough application.

4 I would commend you for the thoroughness of your
5 standards. Could you describe -- I have a few
6 questions, but first, describe what the major
7 changes were from your earlier standards to the
8 2016 standards.

9 DR. KING: Yes, that has been our major
10 focus over the last -- since even before 2016.
11 We implemented, at the end of 2016,
12 probably -- well, the most major change in
13 curricular standards since almost 100 years ago,
14 believe it or not.

15 We went from a core -- almost a core
16 curriculum prescriptive type model, so looking for
17 core classes, if you will, to a competency-based
18 model and focused, really, on -- did a thorough
19 assessment of all of the available information,
20 including job task analysis that had been done in
21 the field for the first time to establish 22
22 foundational competencies for the MPH degree and

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1 20 foundational competencies for the DRPH degree.

2 Then laying on top of that is the
3 foundational knowledge, so it's a very
4 skills-based education now, as opposed to a
5 content-based education, which we believe serves
6 students in the field, the workforce, in a much
7 better way. But I will tell you it's been -- it's
8 turning the Titanic with getting over 200
9 institutions to change their -- the focus of their
10 education from being very content based, sage on
11 the stage, teaching what I want because I've always
12 done it this way, to really focus on student
13 outcomes and student skills, in the end. That's
14 the thumbnail sketch.

15 MR. WOLFF: Thank you. I wanted to
16 follow up on that. Because I looked at some of
17 the reports that you have the pre-standards and
18 the new standards. It looks like an extremely
19 detailed and thorough review of each of the
20 competencies. I have, actually, a few questions
21 to try and understand it better.

22 One is that I really like the approach

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1 you have not only to assess each of the
2 competencies, but to demonstrate that the students
3 have actually achieved it.

4 I was just curious to know, given the
5 nature and the magnitude of the change, how have
6 you been able to actually assess, in each of the
7 12 plus 22, and then there are the additional 5
8 areas that each program can select on its own, which
9 seems like a massive undertaking of not only
10 assessment, but demonstrating achievement and, as
11 I understand your standard, demonstrating that all
12 students awarded the degrees need to demonstrate
13 that they've met each of those competency areas?

14 How are you doing it, and how is that going?

15 DR. KING: That's quite an
16 undertaking, as well. We have been -- we're in
17 the process, still, of implementing. Our programs
18 had two years from the adoption of those to change
19 their curriculum and submit to us what we called
20 a compliance report.

21 Every program that we accredit either
22 underwent a full site visit using the new criteria,

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1 or they had to submit to us a compliance report
2 on just those competencies. Then we actually went
3 through two rounds of those compliance reports.

4 That, we just did an immense amount of education
5 around that.

6 We offered small group consultations,
7 so they could share best practices. We would
8 review some of the drafts of things that they had.

9 We did a lot of consultation visits related to
10 it, so that they were able to -- the faculty were
11 really able to understand what we were looking for,
12 and then make adjustments related to that. When
13 the self-studies come in, we do a lot of triage
14 at the staff level. My staff is a staff of ten.

15 It's all very program heavy, so it's
16 program-focused. I had a team of accreditation
17 specialists who are looking through each of those
18 competencies, every single syllabus, and verifying
19 that the assessments look plausible, that the
20 students know what they're expected to be able to
21 do at the end of their program, and that there is
22 an assessment opportunity in that program that

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1 addresses that exact competency.

2 It's a real one-on-one analysis, and
3 it takes a lot of time, but it's worth it. I think
4 there was a lot of -- as you can imagine, when you
5 change something so dramatically, there was a lot
6 of skepticism, pushback at the program level.
7 Eventually, we've gotten the early adopters on
8 board. Now we're getting the mainstream bulk on
9 board.

10 We've still got a couple of the outliers
11 that are still working hard, and we're giving them
12 some extra handholding, but everyone's coming
13 through it. We're actually hearing some really
14 positive comments about the way it's both engaged
15 the faculty and the students around the new
16 curriculum.

17 MR. WOLFF: Thank you. It's very
18 thorough, and I appreciated the competencies.
19 They're very clear. As I read through the
20 reports -- let me see if I understand the process.

21 The team actually goes through each of the
22 competencies and writes their findings, goes to

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1 your council, and you council then takes the
2 response and they make modifications that's then
3 found in your letter.

4 It seems as if the council is actually
5 doing very thorough work of taking the team report
6 and the response, and then the letter actually
7 reflects their response, the council's response
8 to the response.

9 DR. KING: That's correct. That's the
10 new report format I think you're referring to,
11 where it's sort of all there. It's the team's
12 report, and then there's a column for the program
13 response, then the council response, so it's all
14 there. Our reports are public information.

15 MR. WOLFF: I wanted to commend you
16 that you're one of the few agencies where you
17 require that each program or school put your report
18 on its website, and your decision letter. I have
19 one concern. That is when I tried to find your
20 standards, I had to have a password to get them.

21 I could not get your standards. They only had
22 general areas on your website.

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1 DR. KING: You mean the criteria?

2 MR. WOLFF: The accreditation
3 criteria. I'd urge you to look at that.

4 DR. KING: Oh, no. Everybody go.

5 MR. WOLFF: I looked at every which way
6 where it said the standards. It only gave the
7 broad titles, but not the actual details. The only
8 way I got your standards was through the
9 attachments to the department's report.

10 DR. KING: You might be
11 referencing -- because that's definitely not the
12 case. I go there all the time because that's how
13 I access when I need to reference the standards.

14 You may be referring to -- there is a self-study
15 and final accreditation report -- what do I want
16 to call it -- archive on the website that you have
17 to request a password to get into. That is the
18 complete library of them that all of the schools
19 and programs can access.

20 MR. WOLFF: Separately, I'll show
21 you -- go on the computer and show you why I'm having
22 that problem.

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1 DR. KING: All right.

2 MR. WOLFF: I tried mightily, based on
3 your website. The other thing I just want to
4 say -- but I really do commend you for where you're
5 going. How do you follow up -- we just heard from
6 ACCET about their follow up on site on employment
7 and employers.

8 How do you follow up on the outcomes
9 around employment? Do you do independent
10 verification in the site visit, rely on what the
11 programs provide? How do you address that?

12 DR. KING: We do rely on what the
13 programs provide. We don't do independent
14 verification of that.

15 MR. WOLFF: I take it you've not had
16 any problem. You also do alumni surveys, so I
17 would assume that you would have serious problems
18 from the alumni if they weren't able to get work
19 or the like.

20 DR. KING: Yes, absolutely, we do. We
21 require that the programs do alumni surveys and
22 look at those job placement outcomes. We look at

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1 those both quantitatively, as well as
2 qualitatively. One of the struggles that we do
3 have is -- and I'm sure other professions of the
4 type that we are might have this problem, as well,
5 but we have difficulty -- our programs have
6 difficulty getting information from alumni, so
7 we're working them through strategies to do that.

8 Really, social media is one of the best strategies
9 that we've found to be able to do that.

10 They do a holistic tracking of alumni.

11 They not only do the survey from alumni, but then
12 they'll also do LinkedIn, Facebook, that kind of
13 thing, to try to figure out where their alumni are
14 going. But no, we have not had -- our graduates
15 get jobs in everything you can -- every kind of
16 sector and type of job that you can imagine, simply
17 because it's so broad, the kinds of concentrations
18 that we have.

19 MR. WOLFF: I wonder, also, are you
20 tracking the amount of student loan debt?
21 Particularly, there's concern about graduate
22 programs, doctoral programs. Students graduate

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1 with a cumulative enormous amount of debt and their
2 capacity to repay.

3 DR. KING: We are not. We don't ask
4 for information about tuition, debt, faculty
5 salaries. We really don't deal in the finance
6 area. The school's association does track some
7 of that information, but that is not something that
8 we look at in the accreditation process.

9 MR. WOLFF: One other question is you
10 have a conflict of interest statement that's quite
11 thorough, I would say, but that's, in large part,
12 because you also provide a cadre, it seems like,
13 of consultants to programs, so you're
14 distinguished between staff consultation and
15 third-party consultation.

16 I just wonder how that's going, in terms
17 of avoiding -- when you recommend a consultant,
18 saying we told you that, but then the team might
19 find something different, or the council.

20 DR. KING: We get that question a lot
21 because I think my agency is a little bit different,
22 in that we do provide pretty extensive staff

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1 consultation. We have very strict rules against
2 any consultation that comes from the decision
3 maker.

4 There is no consultation that happens
5 for any of the decision makers. The third
6 party -- we rarely recommend any third-party
7 consultant. It's really primarily my senior staff
8 that work with the programs in a consulting way.

9 It's also sort of a line between what we would
10 consult on. For example, we would give them our
11 best judgment about whether or not a particular
12 assessment of a competency is going to satisfy the
13 council.

14 We would give them that, but if they
15 wanted us to help them develop competencies, we
16 would not do that. It's very
17 accreditation-focused, the kind of consulting that
18 we do. We also focus a lot -- and maybe this gets
19 to questions I know have folks have about
20 innovation.

21 We focus -- we also -- listening to
22 AVMA, we believe our programs really do innovate

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1 really well, but I don't know that it's shared very
2 well. A lot of what we do is really facilitate
3 program-sharing with each other the innovations
4 that are emerging. That's the other part of a lot
5 of those webinars that we do and other kinds of
6 workshops and training.

7 MR. WOLFF: Thank you.

8 CHAIR KEISER: Just to clarify, I was
9 able to pull up the criteria on the website.

10 DR. KING: Thank you.

11 CHAIR KEISER: You must have a firewall
12 problem. I think Jennifer, too. She's got it
13 there.

14 DR. KING: I'm really glad to hear
15 that.

16 CHAIR KEISER: We just want to make
17 sure we're accurate. You have a firewall issue.
18 Sorry. Questions from anyone? Frank.

19 VICE CHAIR WU: My understanding is the
20 master's degree enrollment in your field is
21 declining, but bachelor's degree enrollment is
22 going up dramatically and the number of programs

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1 is going up. I wonder if you want to speak to that.

2 Is the decline in the primary master's degree
3 program a concern? Is it not a concern? As an
4 accreditor, do you care? Do you not care?

5 DR. KING: That is absolutely true.
6 Let me think how -- again, our agency is very
7 separate from the schools association, who mostly
8 collects those data. When we look at student
9 enrollment, we're really just looking at it in
10 terms of capacity for the program to offer a quality
11 education. We're looking at faculty versus
12 students, that kind of thing. The schools
13 association looks more at trends. I do know that
14 they see the trend being about -- I'm really
15 gathering this from the back of my brain -- about
16 3 percent drop in the number of applications at
17 the MPH level, but it is growing at the
18 baccalaureate level.

19 There's also some interesting changes
20 at the master's level, in terms of where students
21 are applying and are they applying close to home
22 or all over? It's sort of interesting, but I do

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1 see that a bit on the decline. The undergraduate
2 programs have been sort of festering for years.

3 I think -- I can't remember how many
4 years ago, less than ten years ago, we began to
5 accredit at the undergraduate level because a lot
6 of our -- a lot of the rural areas in the country,
7 health departments, for example, local health,
8 they were hiring at the undergraduate level.

9 There really weren't -- there weren't
10 a pool of public health graduates to hire from,
11 so they were hiring people with bachelor's degrees
12 from all different kinds of fields and training
13 them there. They were demanding that they have
14 some quality assurance for those bachelor's
15 degrees, so we began to do that. The field has
16 really been, up until about a decade ago, only kind
17 of recognized at the master's level. I think
18 you're sort of seeing the natural progression of
19 our field. Yes, we are still getting those
20 undergraduate programs on board with
21 accreditation. Many of them come out of the
22 humanities, so programs that are not used to the

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1 accreditation process. They're taking a little
2 while to get them up and running.

3 CHAIR KEISER: Any further questions?
4 Kathleen.

5 MS. ALIOTO: In your curriculum, is
6 there any discussion about the opioid crisis?

7 DR. KING: I would say yes, absolutely.
8 Our curriculum is skills-based, so there is no
9 particular topic of any sort mentioned in our
10 criteria. However, I do know that through case
11 studies and other items, they are absolutely
12 talking about the opioid crisis.

13 It's a huge public health crisis.
14 Public health's contribution to working on that
15 crisis is really so that we have data related to
16 it. Public health folks are the ones collecting
17 those data and figuring out how to communicate them
18 and working with other health professionals on
19 policy issues, that kind of thing. Public health,
20 we are not prescribers or don't have any of those
21 kinds of responsibilities, so our role is really
22 kind of tracking the epidemic.

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1 MS. ALIOTO: Thank you. Also, does
2 any of the curricula deal with patient-provider
3 relationships?

4 DR. KING: No, because public health
5 is not -- is other than patient care. While many
6 of the health -- most of the health professions
7 are kind of patient-related, individual-related,
8 public health is population-related. That is not
9 something that we address at all.

10 MS. ALIOTO: You mean it's more
11 theoretical than with people?

12 DR. KING: No, in public health, the
13 population is the patient, whether that population
14 is a community or the population is a school, the
15 population is the patient. There's not an
16 individual patient relationship in public health.
17 It's more of a policy, education, data, those
18 kinds of things.

19 MS. ALIOTO: Thank you.

20 CHAIR KEISER: Federico.

21 MR. ZARAGOZA: You noted that you have
22 a 70 percent graduation rate standard. Then you

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1 also indicate that you've got some post-graduate
2 graduation measures, as well, including job
3 placement, but you don't have a standard there.

4 My question is what do you do with the data that
5 you collect?

6 DR. KING: We do have a standard around
7 job placement. It's post-graduation outcomes.
8 Many of our -- particularly the undergraduate
9 students, many of the master's students continue
10 their education, so that's also considered a
11 positive post-graduation outcome.

12 We require an 80 percent threshold on
13 post-graduation outcomes. Then graduation rates,
14 depending on the degree level, it's either 70
15 percent for master's and bachelor's degrees, 60
16 percent for doctoral degrees.

17 MR. WOLFF: Browser issue.

18 DR. KING: I knew that. I knew it was
19 not --

20 (Simultaneous Speaking.)

21 MR. WOLFF: No on Firefox, yes on
22 Chrome. I do wonder, on a more general area, how

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1 do you do with the politically charged issues
2 around family planning and the abortion debate
3 that's now being legislated a lot? Do you allow
4 your schools, or is there any way in which you -- is
5 there a free speech issue, or has that proved to
6 be a political issue in any of your schools?
7 Because it's certainly a hot-button political
8 issue.

9 DR. KING: It's not one that I -- that
10 is not one that has ever risen to my attention.

11 I'm positive that those are things that they talk
12 about, in terms of education around policy in the
13 schools, but no, that has not risen as any kind
14 of concern or difficulty with them discussing it
15 or teaching about it.

16 MR. WOLFF: I'm done.

17 CHAIR KEISER: Good. Any other
18 questions? No. Rick? Thank you very much. Any
19 third-party comments? No? Member of the staff,
20 come back. Any comments on the presentation?

21 MS. MCKISSIC: I have no additional
22 comments, thank you.

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1 CHAIR KEISER: Okay, primary readers,
2 is there a motion?

3 MR. WOLFF: I would move the staff
4 recommendation to renew recognition for five
5 years.

6 MR. O'DONNELL: Second.

7 CHAIR KEISER: Motion is seconded.
8 Further discussion/questions? Sensing none, all
9 in favor of the motion raise your hand.

10 (Show of hands.)

11 CHAIR KEISER: All those opposed.

12 (Show of hands.)

13 CHAIR KEISER: Good. Take a
14 ten-minute break?

15 PARTICIPANT: Yes.

16 CHAIR KEISER: It is time for a
17 ten-minute break, and then we come back and have
18 a very interesting discussion led by Claude that
19 was ready last February, but we didn't meet.

20 (Whereupon, the above-entitled matter
21 went off the record at 1:59 p.m. and resumed at
22 2:10 p.m.)

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1 CHAIR KEISER: If you could all please
2 take your seats, we'll get started. At the last
3 meeting, an issue was brought up and we had a long
4 conversation about -- specifically, it was one
5 issue on the conversion of institutions that
6 converted from non-profit to for-profit. The
7 conversation expanded and a subcommittee was
8 formed to discuss substantive changes, in general,
9 and some specific issues within that. First of
10 all, I want to thank the committee because the
11 committee's had a number of meetings that were
12 there. It was very lengthy discussions, follow
13 up with different agencies.

14 I want to thank everybody who was
15 involved, staff and members of the committee. At
16 this time, I'd like to present Claude to make a
17 report on the subcommittee on substantive change.

18 MR. PRESSNELL: Thank you, Mr.
19 Chairman. As has been a recurring theme, I should
20 note that this was supposed to be given at the
21 February 5, 2019 meeting, but due to the lack of
22 appropriations, we were unable to meet. That just

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1 sounds so official coming from them, so I thought
2 I'd try that again.

3 Just to make sure everybody does
4 understand the context, it was to be delivered at
5 that time. As the Chairman noted, this was really
6 in response to the session from May 2018 on the
7 oversight of for-profit institutions converting
8 to non-profit entities. The committee heard an
9 extensive number of comments on this issue, and
10 we took those comments very seriously. As a
11 result, the Chairman called for a subcommittee to
12 take a look at substantive change, and particularly
13 looking at the conversion of institutions moving
14 from for-profit to non-profit. The subcommittee,
15 I don't remember raising my hand, but somehow I
16 ended up chairing it. That's what happens --

17 CHAIR KEISER: Prerogative of the
18 Chair.

19 MR. PRESSNELL: Yes, that's right,
20 prerogative of the Chair. As a subcommittee, we
21 did have numerous phone conversations to discuss
22 this issue. We talked, as well, about the current

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1 regulations related to substantive change.

2 Then we hosted some calls with a
3 regional accreditor and representation from CRAC
4 to better understand the current scope of practice
5 and frequency related to the tax status change
6 request. Subsequent to -- following or subsequent
7 to that May 2018 meeting, the subcommittee became
8 aware of a study being done by the Government
9 Accountability Office, GAO, that they had
10 initiated related to this particular issue, and
11 also the Secretary had called for negotiated
12 rulemaking related to accreditation, which we
13 heard from the undersecretary today about the
14 results of that. Therefore, we felt as if we
15 should put our inquiry on hold with what we knew
16 at the time and see how the outcomes of those two
17 initiatives would be.

18 Consequently, what we -- based on the
19 subcommittee's discussions and considering those
20 ongoing evaluations, we decided just to offer up
21 some observations, rather than any definitive
22 conclusions. The first one is that the regional

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1 accreditor consultant indicated that there are
2 multiple levels of review which occur when an
3 institution seeks substantive change resulting in
4 tax status conversions from for profit to
5 non-profit.

6 These begin with preliminary
7 conversations prior to the formal review,
8 pre-application reviews, formal review of the
9 process, with a site visit to the institution.
10 If the change is approved, there's a mandatory
11 follow-up, following the implementation of the
12 change. The accrediting associations undertake
13 a review of the impact on governance, academic
14 quality, the availability of financial resources
15 to ensure that the quality will be maintained, and,
16 if needed, additional financial expertise is
17 brought in for these reviews. The accrediting
18 agency also consults with officials responsible
19 for such reviews at the U.S. Department of
20 Education.

21 The subcommittee was advised that there
22 is really good flow of conversation and information

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1 between the department and the regional
2 accreditors as it relates to this particular issue.

3 It should be noted that not all proposed
4 conversions have been accepted, so there have been
5 a number of them that have been denied. Obviously,
6 we know some have been accepted, as well.

7 In certain tax status change requests,
8 the creditors have identified that, when changes
9 are needed, which led to changes in governance and
10 has led to changes in ensuring academic quality.

11 The focus on the final reviews in such conversions
12 is on the assurance of adequate resources to
13 protect the integrity and the quality of the
14 academic programs and student support. In sum,
15 the subcommittee was satisfied with the depth of
16 substantive quality of the review conducted by the
17 regional accrediting associations, and we feel
18 like it was appropriate in the role of assuring
19 quality and integrity of accreditation.

20 Given that review, we believe that the
21 accrediting agency should primarily be concerned
22 with institutional integrity, transparency of

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1 operations, and programmatic quality. Tax status
2 should not enhance nor diminish the review of an
3 institution's compliance with the criteria of
4 accreditation.

5 Proper control of the institution's
6 programs and contracts, transparency in
7 governance, and resolution of conflicts of
8 interest are all key components to the
9 accreditation process.

10 If, however, the peer review system's
11 not adequate in evaluating the complex financial
12 control issues, the agencies should continue to
13 seek outside expertise to assist in that review.

14 Next observation was that the interdependency
15 among the accountability agencies is critical.
16 Often referred to as the triad, institutions are
17 held accountable to accreditors, federal
18 government, and state government; whereas, the
19 accrediting agencies focus on quality of programs,
20 institutional capacity to meet the state
21 admission. The U.S. Department of Education and
22 the Internal Revenue Service and states also hold

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1 a responsibility in ensuring campuses follow
2 proper procedures when approving the change in
3 institutional tax status.

4 Students and families heavily rely on
5 this independent interagency review to protect
6 them from fraudulent activities. We mentioned the
7 triad because each group has a very critical role
8 to play within that. Current statutory and
9 regulatory requirements provide for the
10 accountability structure noted above.

11 The subcommittee feels as if the
12 current structure's adequate if all the parties
13 involved in the approval process adequately
14 fulfill their oversight role. Should Congress
15 seek to more strictly address the tax status change
16 issue, legislative action would need to be
17 considered. Concerning the more broad issues
18 related to substantive change, the subcommittee
19 points to the previous paper that was issued in
20 February 2018, wherein NACIQI offered guidance on
21 deregulating and reducing unnecessary costs
22 embedded in the accreditation process.

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1 Specifically, the report noted that to further
2 encourage institutional responsiveness and
3 innovation, the committee believes that
4 substantive change and additional procedure report
5 should be managed in a risk-informed approach.

6 Consequently, the committee recommends
7 that they allow accreditors to limit the kinds of
8 substantive changes that would require approval
9 by accreditors for high-performing institutions.

10 Established institutions should have
11 flexibility to make changes necessary to address
12 the needs of their students, also to allow
13 accreditors to limit additional procedures for
14 high-performing institutions to only those cases
15 where substantive changes are when a branch/campus
16 are up for re-accreditation or accreditation
17 reviews.

18 Then the final thought was that NACIQI
19 will continue to monitor the issues related to
20 substantive change. The committee will be paying
21 particular attention to rulemaking activities
22 related to accreditation and the results of the

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1 GAO study. Mr. Chairman, that is pretty much the
2 report from the subcommittee.

3 CHAIR KEISER: Thank you, Claude.
4 Questions? Most of you were on the committee, but
5 are there any specific questions that you may have?

6 We have one public commenter who would like to
7 make a presentation. Bernie?

8 DR. FRYSHMAN: I guess I'm at a little
9 bit of a disadvantage. I did not figure that I
10 would hear all about the conversion. I'm not very
11 adept at that whole area, tax status and the like,
12 but I thought I would just make a few comments about
13 the manner in which substantive change was placed
14 in the regulations and what it means for us, as
15 accreditors.

16 Basically, I think that the department
17 and NACIQI, working with the department, should
18 take a more trusting approach to this part of the
19 accreditation process. We're trusted to receive
20 schools in initial recognition.

21 We are trusted to make decisions,
22 sometimes subjective decisions, with respect to

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1 renewal of recognition and, very often, about
2 making decisions regarding sanctions. The same
3 approach should really take place with respect to
4 substantive change. Agencies know their schools,
5 to a great extent. I run a small agency,
6 relatively small. We have a pretty good idea
7 whether a school is big enough and strong enough
8 to undertake a substantive change, whether it be
9 an expansion of a program or an additional
10 location.

11 To have to go through a whole litany
12 of prescriptive activities just because it says
13 so in the guidebook is really not very productive.

14 I guess my comments would be that we should be
15 much more expansive. Of course, there could be
16 a trust and verify. The NACIQI could ask that
17 there be a list of substantive changes that have
18 been taking place.

19 Then when people are up for renewal of
20 recognition, somebody might say what took place
21 at this particular substantive change and was it
22 successful and what were the circumstances which

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1 were discussed. These are areas which could lead
2 to a piercing of the paper curtain.

3 Sometimes, there's a paper curtain
4 which papers over the realities of what takes place
5 in accreditation, as accreditors check off all the
6 boxes, provide the 60,000 pages of documents, and
7 except for the people who are the staff, except
8 for staff, which really does go into the realities
9 of an accrediting body, the community, at large,
10 very often misses what is really taking place.
11 This is particularly true in substantive change.

12 If there were a re-orientation of how
13 substantive change would be addressed, so that,
14 as I said earlier, the agency would be trusted to
15 carry out its responsibilities responsibly and,
16 at the same time, NACIQI or the department could
17 zero in on some randomly selected substantive
18 change, I think a great deal more insight would
19 develop and, at the same time, the process, I think,
20 would be much more effective.

21 There are other areas that one could
22 speak about. One of them is that I think we should

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1 always remember that regulation and law are just
2 guides in education. They're not to be barriers.

3 So good sense should always play a major role in
4 all the things that we do, and reality beyond the
5 paper curtain should also take place. Thank you.

6 CHAIR KEISER: Thank you, Bernie. I
7 think Claude -- I think the report addresses that
8 a lot. Go ahead. You want to explain?

9 MR. PRESSNELL: Yes, I will, and not
10 only that, but the report we did on deregulation,
11 I think, addressed it even more pointedly. That
12 was done back in February, I think, of '18, is when
13 we presented that. Those last two elements, we
14 kind of reiterated those. Now I want to kind of
15 get your feedback on the idea of risk-informed
16 approach.

17 And that was our thought, was to allow
18 accreditors to take a little bit more of a
19 risk-informed approach to substantive change, so
20 that it allows for innovation, quicker response
21 to programmatic needs an institution may have.
22 Not only that, but may allow accreditors to focus

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1 their resources on institution in a higher need
2 position and assist them out of that, if possible.

3 Do you have any thoughts on that?

4 DR. FRYSHMAN: Just one. I thought I
5 mentioned it in passing. There should be a verify
6 aspect, as well. Innovation is important.
7 Innovation is sometimes necessary. But not all
8 innovation works. There should be some way which
9 government, the department, NACIQI, somebody
10 should be looking at an innovation saying what
11 happened? Did it succeed? Let's spread it. If
12 it didn't succeed, let's see why it didn't succeed,
13 and so forth. The trust is very important, the
14 verify is just as important.

15 CHAIR KEISER: Jennifer?

16 MS. HONG: Just to follow up on the two
17 outstanding issues, for the -- under rulemaking,
18 the substantive change provisions were largely
19 unaffected. I think there was a minor change
20 regarding the contracting out with outside
21 entities provision.

22 That was fairly minor. As for the GAO

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1 study, I believe that's still ongoing. We haven't
2 heard any closure with that. But as soon as I do,
3 I'll be happy to report out.

4 DR. FRYSHMAN: It seems to me that
5 NACIQI has a certain flexibility, if not pushback,
6 at least to be heard and to transmit the feeling
7 of the community to the department, so that
8 whatever flexibility remains in the regulations
9 and in the law should be imposed.

10 Sometimes, the accreditor is stuck.
11 I have to address the regulations, and I have to
12 follow the guidelines. I have to satisfy staff.

13 I come to NACIQI and you hear the paperwork. You
14 hear the recommendations. But nobody really looks
15 deep -- deeply. I've often suggested that NACIQI
16 should meet informally with accreditors, not just
17 across the table, but just as colleagues and have
18 some conversations, maybe ask to come on a visit
19 at one time. That could also be helpful.

20 I've suggested that journalists and
21 legislators participate in decision-making
22 meetings or on-site visits, so that accreditation

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1 is not some abstract target for people to go
2 attacking, but something real to see that all of
3 us are doing a very, very difficult job with a lot
4 of dedication and that the taxpayer is being served
5 by accreditation. But that's extra.

6 CHAIR KEISER: I couldn't agree with
7 you more. I do believe, just listening to Diane
8 this morning, there will be some opportunity for
9 agencies to innovate, for agencies to look beyond
10 just what's in the statutory requirements and
11 soften some of the regulations that we have been
12 dealing with over -- at least since I've been on
13 the committee. Susan?

14 MS. PHILLIPS: It's just a question for
15 Claude, not for our commenter. In the committee's
16 discussion, subcommittee's discussion, I know one
17 of the concerns about the substantive change of
18 conversion has been the capacity of the agencies
19 to have the expertise to evaluate whatever
20 contracts or new novel arrangements there are that
21 come out of a conversion. I wondered if you could
22 speak a little bit to what you learned about the

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1 agency capacity and what reassurance there is about
2 that.

3 MR. PRESSNELL: Yes, we actually
4 talked about that at quite a bit of length. What
5 we found out with the regional group that we talked
6 to is that they feel very enabled to bring in
7 additional expertise if they need to do that, if
8 it's a very complicated financial transaction in
9 the tax status issue and exactly how that's going
10 to play out, in terms of ownership of particular
11 contracts, whether or not the academic program
12 remains intact, but they're going to subcontract
13 all of the student services pieces types of things.

14 Then they tend to seek outside
15 financial expertise to be able to advise them on
16 potential conflicts within that, and also whether
17 or not the resources, as a result of the conversion,
18 would still be in place to make sure that the
19 programs -- the program quality can be maintained,
20 which was I was pleased to hear that once they
21 realize it's outside their scope, they feel good
22 about going --

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1 MS. PHILLIPS: Same true for what was
2 formerly known -- the national accreditors -- I'm
3 thinking about the full scope of institutional
4 accreditors here, not just the regionals.

5 MR. PRESSNELL: We did not actually
6 look at -- we didn't have any conversations with
7 any institutional accreditors at the national
8 level. It was all at the regional. It was
9 somewhat limited. We did this in a pretty short
10 period of time.

11 MR. BOEHME: Does anyone -- I want to
12 be respectful of our speaker's time, if anyone has
13 any questions for him. Thank you.

14 CHAIR KEISER: Thank you. We will go
15 with Simon first. Then we will go with Jill, and
16 then we will --

17 (Simultaneous speaking).

18 MR. BOEHME: I'll yield -- I'll go after
19 Jill.

20 MS. DERBY: I don't know why you're
21 doing that, but I will --

22 MR. BOEHME: I like you, Jill.

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1 MS. DERBY: I don't know if they're
2 related at all, but I just wanted Claude to
3 elaborate a little bit for me about --

4 PARTICIPANT: The mic. Jill, the mic.

5 MS. DERBY: Oh, there it is, okay. If
6 you would elaborate a little bit about the
7 risk-informed approach to substantive change.
8 What might that look like?

9 MR. PRESSNELL: I would -- I'm just
10 shooting from the hip here as a possibility. I'm
11 sure that we can punch holes in it over time. But
12 if you've had an institution that has had multiple
13 reviews for which there are no or very minor
14 findings over a long period of time, then they would
15 be considered a very low-risk institution, so they
16 ought to be able to move a little bit quicker.

17 They're still keeping everybody
18 informed. They're still submitting annual
19 reports to their accreditor. But instead of
20 saying you can't move until we come and approve,
21 we allow some movement to take place, within
22 reason, to expand the programs versus someone who

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1 is -- I don't even want to say on sanction, but
2 maybe had been on sanction, and so forth, who needs
3 to be -- they would be a little bit higher risk
4 institution.

5 CHAIR KEISER: Jill, just to remind
6 you, some of those recommendations came out from
7 a previous committee from this one. These have
8 been in the process for a while.

9 MS. DERBY: But nothing has been
10 adopted is what I heard --

11 (Simultaneous speaking).

12 CHAIR KEISER: We don't adopt
13 anything.

14 (Simultaneous speaking.)

15 CHAIR KEISER: We just make
16 recommendations.

17 MR. PRESSNELL: But we did vote on the
18 first report --

19 CHAIR KEISER: Yes, we did vote.

20 MR. PRESSNELL: -- and we did vote to
21 accept the first report to go to the secretary.

22 CHAIR KEISER: Right. Then Simon, are

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1 you going to yield to Kathleen --

2 (Simultaneous speaking)

3 MR. BOEHME: No, I like you, too,
4 Kathleen. I'm sorry. First of all, I just want
5 to say hats off to Claude for being a tremendous
6 leader, and also to the Chair, Art, for allowing
7 us to explore this issue because it's really gained
8 a lot in popularity. Eventually, I'd like to turn
9 this into a motion, but maybe just to kind of spark
10 this and keep the conversation moving, in terms
11 of action items, in terms of moving forward. My
12 colleague, Susan, asked a really good question.

13 We didn't speak to national
14 accreditors, which I think is a worthy exploration.

15 I think as we go through this period of learning
16 more about the topic, there's still more to
17 uncover. We're certainly not at the point of
18 making any recommendation. I think the cadence
19 we're moving at is good to continue to talk with
20 more people.

21 So I would like to propose three steps.

22 Of course, I won't be here, unfortunately, to see

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1 it. But the first one is develop a list of best
2 practices for accrediting agencies considering a
3 -- non-profit conversions and for the department
4 to consider them.

5 I think the second is considering in
6 the spirit of our pilot by asking accreditors a
7 certain set of questions, we could also adopt a
8 similar fashion to that. We could make it very
9 simple. Have you done any conversions since you
10 last came before NACIQI? They can report the
11 number, or they can go into depth as much as they
12 like. I think the third would be to just revisit
13 the issue with a survey to institutional
14 accreditors, including national accreditors, to
15 get more information. Of course, this may
16 conflict with the GAO report that's being
17 conducted, and we can wait until that. The third
18 option, maybe we could wait.

19 CHAIR KEISER: Just if I may comment
20 on it. The total number of conversions are, I
21 think, less than 20 out of a cohort of 3,000
22 institutions. It is a very specific issue to a

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1 very specific subset of schools within a very
2 specific subset of the community. I think we also
3 got the report -- I don't know if you did, but I
4 got it from one of the nationals.

5 In fact, an even more robust process,
6 in terms of board membership in a for
7 profit/non-profit conversion. We can continue
8 the conversation, but again, it seems to me -- I
9 think Claude did a pretty -- and the team did a
10 pretty exhaustive view of it. I'm not sure what
11 would be your purpose of moving forward with it
12 because it's such a small subset.

13 MS. HONG: Just to add to that, the
14 focus on the regional accreditor was rather
15 deliberate because they had conducted most of the
16 approvals for the conversions that had
17 far-reaching consequences.

18 MR. BOEHME: No, absolutely. I think
19 Claude did a tremendous job. While I may agree
20 it is a subset, maybe it's just adding one question
21 to the pilot, and that's it. Of course, I think
22 a lot of this does rely on -- it's a very

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1 case-by-case basis. I think these three action
2 items are only for talking points if the committee
3 feels so inclined, but they're just ideas.

4 CHAIR KEISER: Further discussion?

5 MR. PRESSNELL: One thing that we
6 really wanted to make sure that came out of this
7 report is that it is not solely the accreditor's
8 responsibility to be the ultimate gatekeeper of
9 this activity.

10 They have a lane to play in, and the
11 IRS does, too, and the Department of Ed does, and
12 our states do. Part of that one bullet was, and
13 the reference to the triad was that everybody needs
14 to wake up on this. It's not just here. We were
15 actually -- I think many of the committee
16 members -- I can't speak for all of them, but I
17 was rather impressed with what, at least, the
18 regional group, the processes they would go
19 through. It wasn't just all of a sudden boom, here
20 it is. It was pre-visits and pre-investigations.

21 Then it was a site visit, and then
22 approval. Then there would be a follow-up site

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1 visit. The biggest concern I had was whether or
2 not there was sufficient expertise at the
3 accrediting level for that. Then when we would
4 press them on that, the response was we would bring
5 in someone who is an expert in that type of arena.

6 You think -- I thought that's pretty
7 good, in light of the fact you've also got the IRS
8 looking at it, and the department's considering
9 it. You would hope that states would raise
10 concerns if there were concerns to be had.

11 We've seen conversions take place, and
12 they've gone well. We've seen conversions take
13 place and it's been a disaster. What we want to
14 try to do is make sure we avert disaster in the
15 future.

16 MR. BOEHME: Then, I guess, maybe in
17 response to that, it's just offering best practices
18 as suggestions. I think Claude has uncovered a
19 lot of great research. Maybe if we turn into a
20 one pager of -- rather than offering a
21 recommendation to -- following our responsibility
22 that we advise the secretary, we could just say

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1 here are some very broad best practices, as it comes
2 to that.

3 Hopefully, it's a useful instrument for
4 accreditors to make sure that they're good
5 conversions. I would just -- I guess maybe my only
6 push for this is just we should leverage the
7 expertise we have here to encourage practices that
8 are filled with integrity and hiring outside
9 consultants. But again, just an idea.

10 CHAIR KEISER: Well said. We should
11 submit the report to the secretary.

12 PARTICIPANT: Mics.

13 CHAIR KEISER: I think it is a report
14 of the whole -- I guess if we want to approve it,
15 we could approve the report and submit it to the
16 secretary for her consideration, since that's what
17 we do is advise.

18 MR. PRESSNELL: Simon's suggesting
19 maybe as a follow up, maybe is to try to put together
20 a one pager that might serve as some best practices,
21 which would take a little bit of additional work
22 to talk with those regional, or even national

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1 groups that have actually gone through that. That
2 would be a healthy exercise for even us, as a body,
3 to see what exactly -- how that was processed.
4 I'd be happy to work with Jen on that.

5 CHAIR KEISER: Oh, good. Thank you
6 for volunteering.

7 MR. PRESSNELL: I think this may have
8 happened last time, too.

9 CHAIR KEISER: Jennifer.

10 MS. HONG: We just have to look into
11 the survey aspect of gathering this information
12 a little bit further. We might run into paperwork
13 burden issues, as well as -- we're tentatively
14 scheduled for our meeting in February. We also
15 want to look at the calendar, see what our time
16 frame is like.

17 CHAIR KEISER: Frank, or Anne. Sorry,
18 Anne was first, Frank.

19 MS. NEAL: Just a quick observation.
20 Rick and I were having lunch together. We were
21 saying that when there are best practices, or when
22 there are systems in place with community colleges,

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1 by way of example, that show student success, it
2 would seem to be an appropriate activity for
3 accreditors to compile best practices and make them
4 available to the other institutions that they
5 oversee.

6 It would seem to me that would be a very
7 valuable endeavor. I don't know that we really
8 see it happen very often. So while we're sitting
9 here talking about compiling best practices, why
10 would that not be an appropriate activity for
11 accreditors to help promote student achievement
12 and all the other good things that we're trying
13 to promote here?

14 VICE CHAIR WU: I was just going to make
15 the motion that we submit this.

16 CHAIR KEISER: There is a motion. Is
17 there a second?

18 MS. HONG: I'm sorry to submit this
19 report?

20 VICE CHAIR WU: Sorry, I'll make it a
21 little more formal. I move that we take this paper
22 and send it to the secretary as a NACIQI proposal.

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1 MS. HONG: We can do that. It may be
2 redundant. Every year, I report out to the
3 secretary and Congress regarding this committee's
4 activities. She will get this, but you want it
5 on a separate rail, flag it for her to her
6 attention?

7 VICE CHAIR WU: Right. Just something
8 that says NACIQI voted. This passed. We'd like
9 to show it to you.

10 CHAIR KEISER: Is there a second? I
11 need a second before we continue. Is there a
12 second, Kathleen?

13 MS. ALIOTO: Well --

14 CHAIR KEISER: Before we discuss it,
15 I need a second.

16 MS. ALIOTO: We can't discuss it
17 without a second?

18 PARTICIPANT: Yes, right.

19 MS. ALIOTO: All right, I'll second it
20 so I can talk. Can it include what Claude just
21 suggested that he would do, one pager of
22 best -- what did you say you would do?

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1 MR. PRESSNELL: I don't know what
2 I -- that we would explore -- I think just trying
3 to visit with those accreditors that have dealt
4 with conversion issues and to see if we can uncover
5 some best practices related to that. I think it's
6 a separate issue from the report, so I don't think
7 it's necessary -- it doesn't necessarily need to
8 amend Frank's motion, necessarily.

9 MS. ALIOTO: Unless he wants to.
10 Frank.

11 VICE CHAIR WU: I don't have a strong
12 view. I'm just trying to move it along. If people
13 aren't -- I thought people were enthusiastic about
14 this, but if people aren't enthusiastic about
15 sending it on, that's fine with me, too, or if it's
16 just in a bundle of things.

17 The reason I made the motion is so this
18 stands out, so it isn't just in a big bundle of
19 other stuff that gets reported and may or may not
20 be noticed. It's sort of highlighting it and
21 saying we did something. We want to tell you about
22 it. Here it is. We think this is a good idea

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1 because nobody has said it's a bad idea. We all
2 seem to agree, so it's good to point that out.

3 CHAIR KEISER: Jen, and then Jill.

4 MS. HONG: If I make a suggestion, I
5 don't want to understate the communication that
6 does go up to the secretary and to Diane, the senior
7 department official. For example, the annual
8 report is due at the end of every fiscal year, which
9 is September 30th. This report will get sent up
10 to the secretary, along with all the activities
11 for this past fiscal year, to the congressional
12 committees, as well.

13 CHAIR KEISER: Which has been limited.

14 MS. HONG: Right. I understand your
15 point, but there has been a lot of attention
16 regarding this particular issue, regarding
17 conversion. Certainly, folks are watching and
18 they're interested and engaged in what NACIQI's
19 discussion is about.

20 CHAIR KEISER: Jill.

21 MS. DERBY: I was going to tell Frank
22 that I am enthusiastic. I wonder if it doesn't

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1 bracket it a little bit by having it go separately,
2 rather than fold it into a whole report. Could
3 you speak to that?

4 MS. HONG: I guess what I'm trying to
5 say is I don't know how much more value or attention
6 it will get sending it up bracketed. We can send
7 up the report and bracket it when we send up the
8 bundle. I think that might be more --

9 CHAIR KEISER: I think the amendment
10 still is there that we submit it. How it gets
11 there, we'll let staff deal with that, make a
12 recommendation. I think your amendment's still
13 there, and Kathleen's second still stands, unless
14 you want to withdraw it, which would kill the
15 motion. Any further discussion on the motion?
16 Sensing none, all in favor of the motion raise your
17 hands, please.

18 (Show of hands.)

19 CHAIR KEISER: All those opposed.

20 (Show of hands.)

21 CHAIR KEISER: One? Okay, thank you.

22 Again, committee, thank you very much for the work

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1 you did.

2 MR. BOEHME: Should I make a motion
3 about the best practices?

4 MR. PRESSNELL: I think it's going to
5 be done.

6 MR. BOEHME: It's going to be done?
7 It doesn't require a motion? Okay.

8 CHAIR KEISER: Okay, Claude.

9 MR. PRESSNELL: Just one last -- I
10 wanted to respond to Anne. I know, having been
11 a commissioner with SACSCOC, that their annual
12 meeting is nothing but best practices. It's
13 incredible how many hundreds of people are there
14 going to breakout sessions on particular issues,
15 sharing best practices. I will let you know that
16 I know, at least at that region, it's done pretty
17 extensively. That December meeting is a very long
18 meeting and very engaged. I just wanted to make
19 sure you knew that.

20 CHAIR KEISER: Okay, not hearing any
21 more discussion, I would entertain a motion to
22 adjourn until tomorrow morning, at 8:30.

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1 MS. DERBY: So moved.

2 CHAIR KEISER: You don't need to second
3 that one. Thank you, everyone. It was a very good
4 meeting today.

5 (Whereupon, the above-entitled matter
6 went off the record at 2:47 p.m.)

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