U.S. DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

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NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL
QUALITY AND INTEGRITY (NACIQI)

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MEETING

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TUESDAY
JULY 30, 2019

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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
CLAUBE PRESSNELL, JR., Member
RALPH WOLFF, Member
FEDERICO ZARAGOZA, Member
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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CHAIR KEISER: If everybody could please be seated, we'll get started. You're up, Jennifer.

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

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

Sections 101(c) and 487(c)(4) of the HEA and Section 801(6) of the Public Health Service Act, 42 U.S.C. Section 296, require the Secretary to publish lists of state approval agencies,
nationwide recognized accrediting agencies, and state approval and accrediting agencies for programs of nurse education that the Secretary determines to be reliable authorities as to the quality of education provided by the institutions and programs that they accredit. Eligibility of educational institutions and programs for participation in various federal programs requires accreditation by an agency listed by the Secretary.

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

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

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

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

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

CHAIR KEISER: Thank you, Jennifer. Welcome, everybody. I also am going to take a point of personal privilege. We did lose a member this last year. If we could have a moment of silence for Bobbie Derlin, who was just one of the
most fabulous members of this committee. I so much enjoyed working with her, so if we could have a moment of silence.

(Moment of silence.)

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

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

MR. BOEHME: Simon Boehme, student member.

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

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

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

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

MR. BOUNDS: Herman Bounds, director
of the accreditation group at the U.S. Department of Education.

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

CHAIR KEISER: Art Keiser, Chancellor, Keiser University.

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

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

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

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

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

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

MR. PRESSNELL: Claude Pressnell, president of the Tennessee Independent Colleges and Universities.
CHAIR KEISER: Again, welcome, everyone. We have a busy two days, so appreciate your help in getting through all the agenda. Now I would like to introduce a special guest who's here with us today.

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

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

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

ACCREDITATION RULES EFFECTIVE JULY 2020

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

I realized, as you were reading my bio, that we need to update my bio. I am no longer the acting assistant secretary. Thank God, Bob King is in place. He was confirmed a few weeks ago.
He is the Assistant Secretary for Postsecondary Ed, and I hope you all will get to know him.

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

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

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

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

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

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

We can't talk about the final rule until it is a final rule, but I just wanted to quickly summarize what was in the consensus language. I think probably at the top of our list was working hard to end the mythology that regional and national accreditation are somehow different. We hold all accreditors to the same set of standards. Institutional accreditors, regardless of whether they are regional or national, are held to the same standards. And therefore we are eliminating the terms regional and national from our vocabulary.

It is no longer part of an accreditor's scope.
We thought that was very important for a couple of reasons. One, we hold all accreditors to the same standards, and, two, that distinction was creating all kinds of challenges for students, who found themselves unable to transfer credits simply because of who accredited their institution.

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

We know that's a large shift, but you will see that -- I think we will probably still all use some old terminology as we're getting used to the new terminology, but you will see, on our website, that we will recognize institutional accreditors and programmatic accreditors, and we will not make a distinction. Geography is no
longer part of scope. It is just one of the things that will be listed about an accreditor, and it will include every state in which the accreditor accredits an institution, not just main campuses.

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

We have also re-introduced the concept of substantial compliance. When I was at the department in the past, we had a substantial compliance standard. The consensus language would restore it, the idea being that if an accreditor is doing everything right, but forgot to have one paper signed or maybe has one typo in the policy manual, they are substantially compliant. And when we have to make binary decisions between compliant and not compliant, two
things happen. One, we withhold a clean bill of health from an accreditor that is, by and large, doing everything right.

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

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

Now that one little thing can't be a really big thing, so an accreditor that misses one big thing could be found not to be compliant, but it's the little things that we want to differentiate between. And we think that
accreditors will then pass that on to their institutions to say let's look at the majority case here. I think we all know that there are unusual and exceptional circumstances that come up from time to time, and we need to address them, and we need to do so in the best interests of students.

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

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

What's happening in the classroom? What's happening with student services? What's happening on the campus? Are the students getting employed afterwards? Do the students feel like they had a good experience? And so what we're really focusing on, then, is accountability, but
mission-driven accountability. We think that accreditors -- we think one-size-fits-all standards can't possibly work. And the idea is that if you can have standards that are appropriate, based on the mission of the institution, you actually can hold that accreditor to a higher set of standards. But when you put the impossible dream out there, it becomes very easy to say we could never hit that.

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

We do want to make sure that there is respect for religious missions. That has always been in statute and always been in our regs, but we felt like we needed to strengthen that because there have been some instances where decisions have been made about institutions based on the tenets of their faith and not the quality of their programs.
We, in the consensus language, have clarified that while we tend to think of one form of institutional governance and decision making, nowhere in the world does it state that's the only way to have governance in decision making. In particular, when it comes to occupationally focused programs, career and technical education programs, where we need to more quickly keep pace with the demands of industry, we can't have a process that takes two years to update every curricular change.

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

We have created, through the consensus language, safe zones for innovation, the idea being that an institution that is otherwise in good standing and with very high guardrails and a clear decision by the accreditor and its decision making
body should have an opportunity to experiment in ways that are maybe outside of our current way of thinking.

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

What we see is, over and over and over again, an extension for good cause. We think we ought to just be honest and say that some corrections have to take place immediately, but other corrections, like student outcomes, could take years to achieve, especially if that means changing your curriculum, changing your admissions practices.
If you're enrolling a new class and putting them through a new curriculum, you may not see the fruits of that labor instantaneously. So we want accreditors to have the ability to give up to four years for corrective action.

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

I think we're all reasonably intelligent people who have a lot of faith in our agencies to say they can differentiate between an immediate change that needs to take place and
something that more realistically is going to take some time.

So we have -- that is part of the consensus language. We have created, through the consensus language, new on-ramps for accreditors. So we all know the catch-22 of becoming a new agency.

If you are a new agency and you want to accredit institutions that are already accredited, what institution is going to leave its current institutional accreditor to go into the big unknown and to partner with a new accreditor that hasn't yet been recognized? Few. If a new accreditor comes in and they're only accrediting new institutions, then there's this narrative about it's not a good accreditor because they couldn't get any of the existing institutions. What we realize is that you need an on-ramp that allows a new accreditor to accredit institutions that already have accreditation, and you need to give that institution time to potentially change who their Title IV gatekeeper is.
Basically, a new accreditor would have a period of time of years, so they have to come in having accredited an institution or a program, and they have to have at least one that says if recognized, that institution would switch to that accreditor as a Title IV gatekeeper, but we're not going to require the institution to make that switch before the accreditor is recognized.

Again, high standards for new accreditors. There's no change in that regard. They do have to have accredited an institution, but we do need to have an opportunity for them to work with institutions that are already accredited and give time for that institution to make a switch for Title IV gatekeeping purposes. Otherwise, you're putting students at risk, and you just can't do that.

We have increased scrutiny on things like new graduate programs and, in particular, when it's because of credential inflation. When an agency says this program has always been at the associate's degree, but now we think it needs to
be at the bachelor's degree, we want to look hard and make sure it really needs to be there.

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

This needs to be empirically based, and there needs to be support within the community. In addition to on-ramps, we realized that we needed to create off-ramps. We think oftentimes, accreditors -- certainly, we, at the department, and we see this with states -- it is really hard to withdraw recognition, accreditation, Title IV or state authorization when you know that that act
is going to turn students out onto the street. And in fact, I think all of us wait a little bit too long to take action because of that.

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

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

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

So the idea of an off-ramp is to help students find a path forward. In addition, we have beefed up the requirements for teach-out plans. We've given accreditors the authority, through the consensus language, to demand them earlier, and we also, in the consensus language, have made it clear that accreditors do need to start looking at teach-out agreements long before the closure is announced.

If you don't look at an agreement until the closure is announced, it's too late. So we think teach-out agreements need to be more robust,
including a list of all of the programs and all
of the potential schools nearby or online that
could take the students.

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

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

We're working hard to reunite the three
prongs or the three, whatever, legs of the stool,
to make sure that we're all working together. And
along those lines, we have re-instated the state
authorization or the state liaison function within
the accreditation group.
We are a triad. All three of us are together. It is not about pointing blame at one member of the triad. It is about all of us coming together and addressing issues together and making hard decisions together, so we really hope to reinforce that the triad has three components, and all three of us have an important role to play.

We have clarified that pre-accreditation is an accredited status. We know that a year or two ago, there was a lot of conversation about retroactive accreditation. This body has about 120 pages of testimony and dialogue about it. And I think what we realized at the department is that if you have a pre-accredited program or institution and you have an agency that will not award a full accreditation designation until at least one class has graduated or passed a licensure exam, you put those students in an awful position by allowing them to enroll and take on debt, but then potentially not be able to benefit from a positive decision based on a review of the program while that student was in
And if we don't recognize the need for those students to benefit from a positive decision, we will see that you can't start new programs, or we will see that accreditors will no longer be able to wait until the first class graduates. So we have clarified that pre-accreditation is an accredited status. That is currently how we treat pre-accreditation. We do allow pre-accredited institutions to participate in Title IV and, by golly, if we're going to let the student take the loan, they have got to be able to benefit from the positive decision.

If there's a negative decision, then those students would have been in an accredited status while they took those classes, but if the institution or program does not receive accreditation, then it ends there and the student is notified that the program or institution is not in an accredited status and Title IV eligibility is lost, in which case, then, we have a teach-out situation where we have to move the student to a
new program, so we've reaffirmed that.

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

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

We call it the handbook. Some people call it the guidebook. Instead of 88 pages, I think it's 23 or 24. And embedded in this is each one of the regs. A lot of the page space here is repeating what the reg is. Basically, what we've tried to do is we've tried to be much more clear, using a table, what needs to be included in the
petition, the idea that we need to move from 60,000 pages, maybe, down to 250.

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

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

    Then finally, what you'll see when you look at this guidebook, there was an Inspector General report that said that the department needed to do more to not allow agencies to cherry pick among their institutions in their petitions, but we needed to go out and do more de novo review,
based on the challenges we were seeing.

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

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

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

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

Again, this is voluntary. Nobody has to use it now. We will move to a -- this format will be what we use for our new regs, but in the next, whatever, year and a half, two years, as we're doing this transition, people can choose to come
in under this guidebook, or they can choose to come back to us under the 88-page book.

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

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

So I'm happy to take questions.

CHAIR KEISER: Jill, you have a question?

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

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

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

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

We want to give accreditors flexibility, but if you're going to give that flexibility, you have to protect the student who enrolls during that period of time, or else no student would enroll, right? You'd have this catch-22. So pre-accreditation is a tool available. Not all accreditors use it. Not all institutions are eligible for it. But among
programs and institutions that are, we want to make it clear that because you can take loans and get Pell grants during that time, those credits will be considered to be from an accredited institution, but if full accreditation isn't awarded, then it stops there.

CHAIR KEISER: Simon.

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

I think the handbook does a great job of being transparent in some areas, and also by reducing the workload, but I think when, again, we come to this common place and some information is revealed, because the department has found
something compliant, that information won't necessarily come to NACIQI.

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

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

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

MR. BOEHME: Thank you.

CHAIR KEISER: Anne.

MS. NEAL: Diane, good to see you.

Thank you so much, and thank you for your focus on student learning and a safe zone for innovation. I know you all looked particularly into the intrusiveness of accreditors into religious liberty, and it's something that you addressed. I wondered how you might also be considering addressing the overreach of accreditors in areas relating to state law.

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

We've seen that in other places, where Northwest takes a second look at what the legislature is doing, in terms of its appropriations. How will you all attempt to address that kind of overreach?
MS. JONES: So I have to say that we don't have anything specifically in the consensus language that looks specifically at state law. But what I will say is that if you look at the consensus language, we've made it clear that while there is one kind of governance that has been sort of the gold standard in higher education, we've recognized that there are different kinds of governance arrangements.

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

We do think there could be a variety of governance models, even within a single institution, where some programs might be subject to a different model than others. So we haven't specifically commented on state legislature, but I do believe that's one of the things accreditors would look at in the context of governance.
MS. NEAL: So you're saying that when accreditors are dealing with trustees and second guessing their efforts, that is not something you'll address?

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

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

Let us take that back and have a conversation. Again, I think we want to be clear. We no longer think the department should impose one-size-fits-all standards on accreditors.
So I think we want to be careful how we intervene and when we intervene, but certainly, we think that there are different kinds of governance models, and certainly different institutions are under different kinds of requirements by their state legislature. But let us take that back and dig into it a little bit further, so that we can come back to you with a more specific answer.

CHAIR KEISER: Simon.

MR. BOEHME: Just one more question.

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

MS. JONES: So I think I have the dates right, but I'm going to look at my colleagues there to make sure. So I think, because the re-recognition was 2016, that their five years will be five years from 2016, so they are already well into that five years.
Am I correct so far? Okay. They do have a compliance report that's coming up. They do have some monitoring reports that are due. So those will be due to the staff. The staff will review them. I can't remember which month in 2016. I think it was December 2016, so maybe that means it's -- November. So Herman's saying November. So they are well into their five years, and they will be up for re-recognition.

MR. BOEHME: Thank you.

CHAIR KEISER: Do you have time for two more?

MS. JONES: Sure.

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

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

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

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

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

(Simultaneous speaking.)

MR. WOLFF: So I'm just trying to think how this is all going to work with a site visit, a report, the opportunity to respond. Is there going to be three site visits, one for the team
visit, one for the commission meeting, and then one to actually look at files in the office? I'm just trying to think it through.

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

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

We want staff to be able to participate in the site visit, participate in the commission's decision-making meeting. Because right now what happens is we can see pieces of different processes, but we don't have the time to follow
a single institution all the way through. Under the new timeline, we will have time to actually follow a decision from start to finish to see how the whole cycle runs with an agency. So it is a longer period of time.

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

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

If they're doing what they're doing, they can keep doing it, but as other agencies are coming in, or maybe they haven't gotten that far and they want to give this a try, so we're allowing institutions -- I'm sorry, agencies under this
handbook to pick this handbook or the 88-page handbook that they wish to come in under. We shared this with a number of accreditors to get feedback. There are no policy changes in this, other than the fact that we're dividing up the petition from a site visit. That's not really a policy change; that's a process change.

When we have the new regulations in place, then we'll update policies in this book. So yeah, I mean, look, it's going to be a lot more work on staff. It's probably going to be more work on agencies. We've tried to expand the team. We've tried to add a few more positions. We need more people to do the work.

We've tried to shift travel budget within OPE because we know that it's going to cost more. But I think we also have the fundamental belief that -- when our staff go to an agency's offices, it becomes pretty clear, pretty quickly, whether it's a well-run organization where everybody who works there understands the policies and procedures.
And it also, like I said, addresses the Inspector General's concern that agencies were cherry picking their best and submitting them, and we were only looking at the best. And we need to look at the full range, so we did have to address the Inspector General's concerns.

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

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

MR. O'DONNELL: Diane, thank you for being here. I'm curious, for the on-ramps for new accreditors, are you hoping -- what are you hoping
that spurs? Are there certain types of accreditors or innovation you're hoping that the on-ramps foster?

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

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

And so we are also, then,
re-introducing the concept of where it makes sense, and it's not just to dodge a negative decision -- where it makes sense, for legitimate reasons, you could have dual accreditation.

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

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

CHAIR KEISER: Paul.

MR. LEBLANC: Diane, thanks for taking time with us. Can you clarify something for me in the new handbook? One of the daunting challenges for institutions, and thus, by extension, accreditors, is the ability to get good
data on income, job placement.

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

MS. JONES: So the new handbook does not change anything about the way we look at student outcomes. The consensus language did address this issue of job placement rates. We actually think it's very dangerous territory for schools to be reporting job placement rates, and we think it's a very expensive undertaking. And we all know that self-reported data has pretty big error bars. And so we are expanding the College Scorecard to provide program-level earnings for every program. We know the shortcoming there is that it doesn't currently list all the employers, although we're having conversations with others. How might we be able to at least integrate a list of top employers? No commitments are being made.

We're looking at it. We think that when schools use the College Scorecard data, it's
government produced data. Sure, people lie on their taxes, so IRS data is only as accurate as it is, but I think people lie less on their taxes than they do when somebody calls them from a number they don't know and says what do you do for a living?

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

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

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

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

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

MR. MULA: Chuck Mula, department staff.

MS. LEFORD: Valerie Lefor, department staff.

MS. HELTON: Charity Helton, department staff.

MS. DAGGETT: Elizabeth Daggett, department staff.
MS. MCKISSIC: Stephanie McKissic, department staff.

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

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

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

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

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

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

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

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

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

And the third is the Association for Clinical Pastoral Education. The readers were Jill Derby and Anne Neal. Are there any third-party commenters?
I would entertain a motion to approve the consent agenda.

MS. ALIOTO: So moved.

MS. JONES: Thank you. I needed somebody, Kathleen. Thank you for standing up.

Second?

MR. WOLFF: Second.

PARTICIPANT: Second.

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

(Chorus of aye.)

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

Yes, Kathleen.

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

I asked Chuck, in the beginning, do you know who did the chiropractic? He said well I did.
CHAIR KEISER: I'm sorry. It is on the agenda, and I did not read those. Just for the record, Chuck Mula was for the chiropractic education. Also, he was the Commission on English Language Program, and on the third one, Valerie Lefor was for the Association of Clinical Pastoral Education.

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

CHAIR KEISER: Simon.

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

CHAIR KEISER: A motion for what?

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

CHAIR KEISER: Would I entertain a motion or discussion?

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

CHAIR KEISER: Go ahead. My pleasure to have you ask questions.
MR. BOEHME: Thank you, and thank you for entertaining me, as this is my last meeting. So pretty soon, I won't be causing as much trouble. Currently, 34 CFR 602.33 says the Education Department staff can review an accrediting agency's compliance with the criteria at any time, mid-recognition review at the request of NACIQI or based on information. The exact language of this is 602.33, Procedures for Review of Agencies During the Period of Recognition.

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

I would like to make a motion that NACIQI should vote to request the department initiates a mid-year recognition period review of ACICS, particularly with respect to 34 CFR 602.15, Administrative and Fiscal Responsibilities. This provision requires that accreditors have adequate administrative staff and the financial resources
to carry out its accrediting responsibilities.

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

I understand we have a packed agenda.

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

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

CHAIR KEISER: Ralph.

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

MR. BOUNDS: So the compliance report, it's in regulation. So the compliance report is due, I believe, to us, on November 19th. So that's going to come in as any other normal compliance report, and that compliance report will follow the process. NACIQI will review. We'll make a recommendation. You guys will make a recommendation, and then that will go to the SDO.

There's also a monitoring report that we also -- that was also part of the Secretary's decision on ACICS. We'll get that information in; we'll review it; and that information will also be made public for folks to see.

CHAIR KEISER: Does that satisfy you?

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

CHAIR KEISER: Will you withdraw your motion?

MR. BOEHME: I withdraw my motion,
Thank you.

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

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

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

The committee will then have a discussion and vote on the agency's application. Then, potentially, a final set of standard questions on improving instruction, program quality for initial and renewal applications.

Are there any questions? Everybody comfortable with our process?

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

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

MR. ZARAGOZA: The Western Association of Schools and Colleges, Accrediting Commission
for Community and Junior Colleges, WASC ACCJC, hereafter referred to as the agency, is an institutional accreditor. The agency's institutions are voluntary members that offer two-year educational programs and award associate's degrees.

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

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

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

One is a petition for continued recognition and a second request to expand the agency's scope of recognition. The agency is currently recognized for its accreditation and pre-accreditation of its member institutions, with a primary mission of granting pre-bachelor degrees, allowing them to offer certificates, associate degrees, and first bachelor degrees, by means of substantive change review offered by institutions that are already accredited by the agency and such programs offered via distance education and correspondence education at these colleges. This recognition also extends to the committee on substantive change of the commission for decisions on substantial changes and for the
appeals panel. The agency's requesting an expansion of its current scope to include the pre-accreditation and accreditation of institutions that may offer bachelor's level degree programs.

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

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

MS. DAGGETT: Good morning, Mr. Chair and members of the committee. For the record, my name is Elizabeth Daggett, and I am providing a summary of the review of the petition for renewal of recognition and request for an expansion of scope for the agency, which is the Western Association of Schools and Colleges, Accrediting Commission of Community and Junior Colleges, or ACCJC. ACCJC was scheduled to appear before
NACIQI at its winter 2019 meeting, which was to be held on February 5, 2019. However, due to the lapse in appropriations, the meeting was canceled. Department staff completed the review of the agency's petition for recognition and provided the agency with a draft staff analysis.

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

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

This recommendation is based on our review of the agency's petition, its supporting documentation, and its request for an expansion
of scope, as well as the observation of a commission meeting in June of 2018 and a site visit in October of 2018 to an institution that offers a baccalaureate degree program. The department also received three third-party comments that all reflected positive opinions of the agency. Our review of the agency's petition found that the agency's in compliance with the secretary's criteria for recognition.

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

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

In addition, the agency provided
documentation of implementation of those policies, procedures, and standards. As stated earlier, department staff observed the site visit, which demonstrated that the policies and practices used by the agency related to the review of baccalaureate degree programs are effective and comprehensive. Since the agency's last review in February of 2017, the department has received no complaints.

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

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

DR. WALTON: Good morning, Chair Keiser, NACIQI members, department colleagues, primary readers. My name is Ian Walton. In my
past life, I taught mathematics at Mission Community College, located in the heart of Silicon Valley, for 33 years.

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

From our offices in Nevada, on the right, I have Stephanie Droker, the senior vice president of ACCJC and beside me, Richard Winn, the president of ACCJC. We all appreciate the thoughtful, thorough work of the U.S. DE staff in reviewing our extensive submissions -- I'm not sure how many thousands of pages -- and forwarding a positive recommendation to your panel.
In the months since our last appearance here, in January 2017, dramatic improvements have taken place at ACCJC, to the benefit of our member institutions and, more importantly, to the benefit of our students. We have an active, engaged, informed commission, charting new directions in an adopted strategic plan. We have a new model for working with our member institutions, the portfolio model that's used by some of our follow agencies. We have new senior leadership, which has created a very different spirit and philosophy from what some of you have seen before. We have new approaches to training, in general, to fiscal monitoring of our institutions, and to our team orientation process.

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

For example, we just recently had 500 participants at our recent conference, with a 98.8
percent positive evaluation rate. We've had many informal comments of appreciation for the changes that have taken place, and we have eager anticipation of continuing innovation, for example, a two-stage review model.

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

DR. WINN: I don't know if you would prefer to proffer the questions, and then we respond, or we have actually copied the questions out of the public register and have some comments regarding each of them, so I'll defer to the readers.
CHAIR KEISER: No, go ahead. It would be fine if you want to work your way through.

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

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

We've been doing a great deal of work in terms of conferences, training, workshops,
raising the level of awareness of the value of our standards, and helping institutions understand what they need to do to bring them into compliance.

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

We specifically, then, look at degrees that are awarded, certificates, transfers. In our sector, transfers are really important. For example, in the California public sector, which is the vast majority of our institutions, 69 percent of those who move on to a four-year institution do so without acquiring an associate degree on the way. Adding in the transfer rates has significantly clarified the degree to which our institutions are succeeding in serving their students. We even go down to the level of course completions and licensure pass rates. We monitor this very carefully.
You've asked about the success with respect to student achievement. We're using a very interesting approach that I'm going to ask our senior vice president, Stephanie Droker, to explain, that asks institutions specifically to document and set standards on a three-year timeline.

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

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

We do watch that. There's no exception to this. With every one of our institutions, we've seen an uptake in their institutions set standards as related to student achievement. We're really
proud of that. The colleges are doing amazing work.

We also ask them, in the comprehensive review, to write about their plans on moving the needle on student learning and student achievement. We call it the quality focus essay. They are to provide a timeline and, basically, it’s a project management tool. Then at the midterm level, when they come back with another report, they’re to give us an update on those plans.

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

DR. WINN: You've also appropriately asked why did we choose this strategy? Why did we put the responsibility on the institution to analyze its context, its program mix, its
demographic history, and say you tell us what you believe are appropriate standards for achievement under each of these multiple categories?

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

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

    Also, we would note that in all of the major systems that we work with -- for example, 85 percent of our institutions are in the California public sector. There are huge state
funded initiatives that are in place to encourage and improve student achievement. We're by no means the only player in town. Part of our job is to give an opportunity for the institutions to document how well those multiple initiatives are working and incorporate those outcomes into their stated goals.

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

As a result, we are working with part-time students, working adults, people who have difficulty enrolling in enough units to qualify for Title IV, diverse educational goals. Not all of them desire a degree. Some of them only desire a single course, in order to move forward in their careers.

We deal with many under-prepared students from high schools, often with long intervals since their high school experience.
Many of them, as you can imagine, require remediation. We're rather eager to see that the performance metrics that are used to appreciate and honor the work of our students reflect that enormous diversity and unique student characteristics.

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

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

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

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

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

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

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

Over the next several years, we really refined and honed our ability to accredit bachelor's degrees, to the point where we would
not be limited to just the first one, which was kind of a negotiated temporary interim compromise.

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

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

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

MR. PRESSNELL: Very good. You talked a little bit about the importance of student mobility. As we take a look at your data, definitely, when you add the transfer rate to the graduation rates, your performance levels are far more robust that way. Just curious as to whether
or not you all had explored reverse articulation with the four-year institutions?

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

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

MS. CHRISTIAN: The reverse transfer concept is not as robust in California, but it's starting to gain traction like in some other states. I would concur with you. If we were to, in a systematic kind of way, from a state
perspective, take on reverse transfers, our numbers are going to jump pretty rapidly.

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

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

Life happens, and sometimes you do a transfer and you may not end up being able to
complete the baccalaureate, but this would secure those credits, at least at an associate level, so I would encourage you to do that. The other question that I had, then want to open it up to my colleagues -- as with a lot of people, we're all concerned about student debt.

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

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

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

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

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

DR. DROKER: May I speak to that?

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

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

DR. DROKER: One of the areas that we've been really interested in is that each -- we have systems that are really doing innovative work with their data. For instance, the California Community Colleges have developed their own college score card, which has now morphed into something more recent, into a vision for success.
We are really interested to see what information the institution, and if they're in a system, what they are using, which is very robust.

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

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

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

MS. CHRISTIAN: What I'd like to add to that is talking about it from a state perspective in California. I was so excited when Diane Auer Jones was presenting and taking rapid notes because one of the points she made was this collaboration, the triad, with the agency, U.S. Department of Ed,
and the states. What I'd like to brag about is the collaboration that's happening with ACCJC with our state agencies, both in the Pacific, that Mary can talk about, and in California.

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

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

This is specifically for the non-traditional population that are not coming directly from high schools, but they're out in the field, like the 25 year olds coming back to gain
those skills. Those skill builder metrics are tied to employment, as well, but the chancellor's office verifies and provides back to the institution, so that's one example. Thank you.

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

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

I don't know what the metric for that is. Then at my own college -- I saw some of you raise your eyebrows when Richard said students may only want a single course. My college is on the
same road as Intel corporate headquarters. I've had many students say to me I need this math class. I do not want a degree; I do not want a certificate; I don't want anything else. I want this single class because it will get me a promotion to a different grade of work. I will be delighted, my employer will be delighted, and yet, on many standard metrics, I will show up as a failure. You're right. We struggle with how to capture that success information.

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

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

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

MR. WOLFF: Good morning, and good to see you all. Also want to commend you for the progress you've made. One a comment, and then a question. I'm looking for your dues, and I can't find them on your website, so help me find it.
There's -- I've done the search for dues, schedule of dues, fees, and it's not there. The reason I --

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

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

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

DR. WINN: One of my first undertakings was to enter into extensive negotiations to find a settlement agreement with the legal action. That had huge monthly fiscal consequences. As a
result of settling that -- and dues had been increased annually for five years, with a supplemental charge on top of that. For the first year that this new team was in place, we did not raise dues at all. The second year, we raised them 2 percent to keep track with COLA. I believe that's the same we're doing for this third year.

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

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

It's all covered by the office. I don't have the exact numbers, but I'm very, very comfortable with where we stand financially. We have good reserves. We have a meaningful investment strategy that involves using those reserves to our benefit. I think the region is...
pleased that we're not, in any way, increasing their financial burden.

        MR. WOLFF: Thank you.

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

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

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

        DR. WINN: I would point out -- let me try this. I would point out that federal financial aid is distributed under federal policy and not a creditor policy. We do realize that it's the responsibility of the creditor to ensure that the educational experience for which federal dollars
are allocated is, in fact, a meaningful and successful academic experience.

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

CHAIR KEISER: I'm blinking green now. Jill, and then I'll make a question. Jill, good luck. Speak up.

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

DR. WINN: A very fair question. The work of accreditation is primarily done through relationships. When the office team, who embody the actual work of accreditation, go to the institution, represent the spirit, the philosophy, the detailed interpretation of the process, a consistent application of what the standards mean, it makes the whole process not only more real, but more reliable and productive.
The vice presidents then come back to the office, talk with each other. What are the issues that have been identified? This then informs such things as team training, conference content, a workshop, and video conference activities.

Basically, what it does is it deepens and clarifies the relationship between the office and the member institutions. It's a model that I had worked with for 12 years with the senior commission and found it to be extremely beneficial. When staff sit in the office mostly, it really creates a barrier and a rich turf for misunderstanding between what the accreditor is seeking to do and what the institutions are doing.

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

DR. DROKER: I guess it's teacher voice time. I hope everyone can hear me. One of the things I like about this is the continuity of care for our early childhood ed professionals of accreditation.
Because we -- by having an institution that you work with, not only do you get to know their unique student body, their unique mission -- we really want to focus on the unique missions and what drives an institution -- but their unique culture.

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

How does that lead to consistent decision making?

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

MS. DERBY: Thank you.

CHAIR KEISER: I have a question.

Sorry about the -- in reading your request for expansion of scope, you discussed the fact that
this really doesn't change the mission of the schools because basically, in one case, you have 135 associate degree programs and one baccalaureate program.

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

That went completely out the window. It's almost impossible to discern between a Miami-Dade, with 25-30 baccalaureate programs and FIU, down the street, which creates almost all similar programs, not even discussing that with private institutions in the area. Yet, they still call themselves a community college and get many of the benefits of having that limited mission. How do you -- where do you go with this? The promise, at least, certainly, the assertion is that this will be very limited. The Florida experience
would dictate otherwise.

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

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

We don't drive it; we don't monitor it. It's just not our turf. We are -- we watch the conversation take place. We're satisfied that the constraints around the additional baccalaureate degrees are very carefully defined in legislation.

There was a move a year or so ago to expand the number, and they allowed 15 baccalaureate degrees state-wide. There was a move to expand them. The
move was turned down because they still wanted more
time to see how well these bachelor's degrees are
playing out in the community college sector. We
watch with interest; we don't drive the process.

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

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

DR. WINN: The understanding is that
the institutions we accredited must continue to
fundamentally self-identify as community
colleges. This includes the philosophy of open
access. It includes the philosophy of adapting
to a wide variety of student types. I don't think
there's any thought, at this point in time, that
the community colleges would become baccalaureate institutions, fundamentally. But I'm also hearing part of your question is how do we make sure that the review process that we employ, given the baccalaureate degree is unique, is responsive to the unique character of a baccalaureate program?

We make sure that there are members of every review team of a baccalaureate experience. We carefully monitor issues, such as faculty credentials, a thoroughness of the curriculum, alignment of the curriculum with the marketplace and issues of that nature, which are distinct from a fundamental change position.

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

MS. CHRISTIAN: Richard, can I just --

DR. WINN: Please.

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

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

There are 15 community colleges. There is effort in Sacramento right now in having those conversations. But let's say the door opens up for a community college like Bakersfield College to offer a second baccalaureate. We would like
the option -- this is sort of advocating to NACIQI, Mr. Chairman, to really consider favorably to the expansion of scope. We would prefer to be with ACCJC because if you look at the 37,000 students that we serve, and a significant number are in career technical education, getting their certificates, and then they have these transfer degrees.

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

To your question, whether we would, in California, like Florida, down the line, have a shift in the number -- the proportion of baccalaureates we offer, I think at that point, maybe I can see whether WASC senior might be the more appropriate place, in terms of the mission. But right now, it would be -- really, we would prefer staying with ACCJC because of the mission.

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

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

So I don't think, at this point in time, there's any serious risk that we would be, now, placed peer to peer with baccalaureate
institutions. The percentage of students who are taking baccalaureate degrees across the system is extremely small.

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

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

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

MS. NEAL: I just want to continue --

(Simultaneous Speaking.)

MS. NEAL: -- with -- sorry. Did I
take somebody else's spot?

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

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

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

What I worry about is that institutions
like ours, NACIQI, by allowing this kind of mission -- on the condition that don't worry, it won't get bigger, in effect, can authorize mission in something that will not, in the long term, potentially be good.

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

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

I would, again, emphasize that the
issue of expansion to baccalaureate degrees is a state-level issue. It's not something that's being driven by the accreditors. We are committed to the concept of being open to innovation, to being responsive to the needs of the region, as those needs emerge.

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

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

In the Pacific Islands, it might well
be that there isn't a baccalaureate degree offering institution for thousands of miles of ocean around. When the students say we want this and, in some sense, the state, certainly in California, has determined that the most cost effective way of doing it, at the moment, is with the existing community colleges, in a sense, we, as an accrediting agency, are saying we take all that analysis; we would like to be able to do that for you and with you.

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

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

DR. OKADA: Covering the Marshall Islands, Palau, the Federated States of Micronesia, the only institution that has a physical presence nearby is really the University of Guam. Then the only other institution in the
Commonwealth of the Northern Marianas that is now under WASC senior is also offering, I believe, two baccalaureate programs.

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

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

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

Let me just flip to another issue. As I looked, with some amazement, really, at the happiness of the third-parties have offered their comments and
Kumbaya moments. Everyone's getting along beautifully. I'm wondering, as I looked, it appeared that you have taken no adverse action since June 2017. Is that true?

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

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

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

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


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

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

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

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

CHAIR KEISER: Exactly. Nursing,
business, it's all the same.

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

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

MR. PRESSNELL: Oh, yes.

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

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

I think Diane Auer Jones mentioned this earlier about the consensus, that the higher credentials, moving from associate's to baccalaureate, baccalaureate to master's, really in the interest of students in the profession, or
are they being driven by other institutions, frankly, that would benefit from that, either by making it more difficult for students to enter the field and, therefore, raising wages artificially for existing members of the field, or, frankly, institutions, themselves, that want to offer these for more enrollment, and the only way to do that is to acquire more credentials. My question is do you have any thoughts on -- we don't know what the final rulemaking is, but what Diane talked about earlier about requiring accreditors to ask, if institutions offer a new type of higher-level credential, if they're really necessary and what's really behind them?

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

I'm just curious how you think about what could be coming at some point in a final rulemaking that accreditors -- and I don't know
the exact language, but should be looking at credential inflation, asking what's really driving it and what's behind it.

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

We remain responsive to reasonable requests for advanced degrees. Similarly, we do push the idea of accrediting bachelor's degrees. Those have, in fact, arisen from legitimate needs within the region of the institutions that we accredit.

Mary spoke to the fact that out in the Pacific Islands, the only opportunity the teaching
core has to obtain an appropriate bachelor's degree is by means of the local community college.

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

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

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

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

It is my understanding, but I think you might need to address, given the structural
difference that's unique between the four year WASC senior and the Community College Commission, and I know that at some point, there were conversations about unification, but the decision was made not to unify.

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

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

For those who may be just a little distant from this curious arrangement, when accreditation agencies began to be formed in the 1880s, moving from New England down the middle states in the 1890s and to SACS in the early 1900s
and Northwest in 1912, there was no such thing as a community college.

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

In the 1950s, the WASC region said there will be two accreditors because the large, extensive community college system deserves an accrediting agency that understands its unique character. So the thought of -- there were some political issues that were at play that raised the possibility of all the community colleges going to the senior commission. What we're reading right now is a great sense of relief that that conversation is off the table, that they're glad for an accrediting agency that is responsible to the unique mission and character of the community colleges.
DR. DROKER: I'd like to go back to a question that was asked earlier, where -- about the rigor and asking the hard questions about these baccalaureate degrees. The fact is we, the accreditor, require higher standards than the state does on the higher -- on the upper division general education.

That's one area where we've pushed the envelope to make sure the rigor is there for baccalaureate degrees. That did not make a lot of friends with the State of California. I think it's important to note that we do recognize our role in making sure that the rigor, the understanding between the lower-level learning outcomes to the upper division learning outcomes have to be clearly articulated. I think that was something that the department staff saw during our sub-change progress with the baccalaureate degree reviews. But it has been a difficult conversation. It is something that we continue to look at as we move forward in reviewing baccalaureate degrees.
CHAIR KEISER: Questions? Federico, then Simon. You wanted to be last, Simon, right?

MR. BOEHME: Go ahead. You go.

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

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

Do you have in mind -- I realize now, your authority has only been under the first baccalaureate. You're looking to expand it. But I'm saying looking down the road, if you have a Florida experience, at what point do they tip over and it's like you're really no longer a community college? Then lastly, if you could, just get a
little bit in the weeds, in terms of your peer assessment for the baccalaureate piece versus -- because I'm in hopes that you're not just simply using another institution that just has one baccalaureate to evaluate a baccalaureate at another institution.

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

The nature of these baccalaureate degrees are defined at the chancellor's office, the state legislature, and we simply want to be responsive to what may emerge. We will do our absolute best, as Stephanie has pointed out, to bring every appropriate level of rigor, to make sure that whatever comes across our transom, we respond to with rigor and great care. But I don't know that any of us are in a position to predict where this is going to go, going forward. It's
an entirely different political environment in
California than it is in Florida.

MR. PRESSNELL: I understand that.

I'm not suggesting that you're driving it. I'm
convinced of your arguments that you're not driving
this at all. I'm more concerned about whether or
not -- about are you tracking that baccalaureate
experience separately from the associate degree
experience?

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

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

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

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

MR. PRESSNELL: That's interesting.
DR. DROKER: I can this about WASC senior. Our standard structure looks very different. I don't know if I can make that comparison.

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

(Simultaneous speaking)

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

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

The application to the state -- and I'm not talking about accreditation, but just the
conversation today -- is very, very rigorous in making the case that it is very unique and what workforce need is it. The degrees are more technical in nature, rather than a baccalaureate in history, for example. That's one point. The second point, in terms of the rigor, for the baccalaureate at the college, when we needed to go through the process, we actually collaborated with our local CSU. For the upper division gen ed outcomes, we had the CSU curriculum committee that goes through the definition and the evaluation.

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

Ours is in industrial automation. Those technical degrees, the outcomes, we work with industry standards and establish those outcomes.

It's very different. The reporting process is
very different. We have dashboards for the baccalaureate.

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

CHAIR KEISER: Simon.

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

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

I think public membership is one of the most important components of accreditation
agencies -- I don't think it's discussed enough. Partly because public membership of the committee of accrediting boards is so important is because it provides an outside perspective, which I think is direly needed by accrediting agencies.

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

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

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

CHAIR KEISER: Frank.

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

MR. BOUNDS: Yes, that's right.

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

MR. BOUNDS: I just did want to add,
under the current rules and statute, the
institutions are still limited to their regions
right now. They're still limited to the regional structure. But in a sense, the national accreditor, they can go wherever they -- excuse me, an institution who's accredited by a national can pick and choose. The regions, right now, they are still established.

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

(Simultaneous Speaking.)

CHAIR KEISER: I do want to put on the record that Kathleen Sullivan Alioto recused herself because of her involvement with Community College of San Francisco. Thank you very much. Will the agency official come forward? I really meant department official, but you are an agency, and I've known you a long time.

MS. DAGGETT: I didn't have anything exceptional to add, other than I know it wasn't necessarily as explained in this particular
request for expansion of scope, but they previously
did do a crosswalk with all the other regional
accreditors in developing their standards. I
think we've gotten past that, at this point, but
that wasn't included in this particular one. I
know that they have done it in the past, when they
were first trying to put together their own
standards, that they did do that type of crosswalk
to ensure that. As far as the expansion of scope
goes, for this particular agency, it has been a
long process to get to this point.

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

CHAIR KEISER: Thank you. Questions
for --

MR. PRESSNELL: I just would say I'm
glad to hear it. I was a little taken aback by
the response to my question, but I'm glad to hear
that. It just seemed to be best practices that you would look, at least, at WASC senior, how they evaluate baccalaureate before you just start approving them on your own.

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

CHAIR KEISER: Simon.

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

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

(Simultaneous Speaking)

MS. DAGGETT: It's not every single one, but there are some -- and some, also, it's travel. Coming from the West Coast, that's pretty significant. I'd say most of the local ones, it's
been on a regular basis.

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

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

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

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

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

MR. ZARAGOZA: I second.

CHAIR KEISER: Second by Federico.
Further discussion?

MS. NEAL: Is that a single motion?

CHAIR KEISER: That's a single motion.

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

CHAIR KEISER: You can attempt to.

(Simultaneous Speaking.)

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

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

(Simultaneous Speaking)

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

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

MR. O'DONNELL: No, I'll be voting
against the motion as it currently reads.

    CHAIR KEISER: Any further discussion?

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

    (Show of hands.)

    CHAIR KEISER: All those opposed.

    (Show of hands.)

    CHAIR KEISER: Motion carries.

    Congratulations. Taking the prerogative to tell you you've come a long way, congratulations. Do we want to take a break? Let's take an 11-minute break.

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

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

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

CHAIR KEISER: Microphone. Thank you.

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

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

CHAIR KEISER: Valerie. Almost every one's working.
MS. LEFOR: This one's working. Good morning, Mr. Chair and members of the committee.

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

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

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

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

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

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

The department did not receive any written third-party comments and has received and closed three complaints during this review cycle regarding the agency. Therefore, again, the staff recommendation to the senior department official is to renew the agency's recognition for a period
of five years. Representatives from the agency are here, and I'm happy to answer any questions that you may have. This concludes my report. Thank you.

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

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

MS. NEAL: These were all resolved how?

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

MS. NEAL: Then what happened?
MS. LEFOR: We're still working to get the final policy. The agency has put forward a new policy, and we're still working to get that final policy. It will be voted on this week. This week is also the agency's commission meeting.

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

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

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

MS. LEFOR: You're welcome.

CHAIR KEISER: Thank you, Valerie. Will the agency representatives please come forward and introduce yourselves?
MR. DUNLOP: Good morning. I'm Paul Dunlop. I'm chair of the -- good morning.

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

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

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

Dr. Bill Larkin, to my immediate right, has served as executive director of ACCET since 2013. Bill brought a versatile background to the position, as well as a style that empowers staff
and is highly collaborative.

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

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

Linsay Oakdon has also served ACCET for
more than ten years and currently serves as an assistant executive director overseeing our team visits and reports, as well as our completion and placement function. Linsay is a former college English teacher.

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

On behalf of the commission and staff, I would also like to thank the professionals in the department's accreditation group, especially Herman Bounds, and most especially Valerie Lefor, for their extraordinary guidance, counsel, and
support. Now, let me turn this over to Bill for his overview. We are pleased to share some information about ACCET that we hope will prove helpful.

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

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

The other major membership group is composed of avocational intensive English
institutions that are required by law to accredited. ACCET accredits 84 such main campuses, with total locations numbering 2,012.

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

Sixteen main campuses are not for profit, none are publicly traded, and the one institution listed on the dashboard as having been placed on HMC-2 is in teach-out status, with a planned closure intended. Our accredited Title IV institutions tend to be modest in enrollment size, with most total enrollments under 450 students and only five Title IV institutions reporting enrollments above 1,000 students. In a given year, during the past six years, total annual student enrollment at asset schools was more than 500,000.
Asset scope permits our agency to accredit institutions offering diplomas, certificates, occupational associate degrees, and instruction via interaction distance learning. The agency's roots, when founded in 1974, are still represented well today by institutions that offer professional development and leadership training opportunities. This group of institutions in our scope has afforded a locus for innovation.

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

Our members expect us to be tough, fair, and user friendly. Indeed, 38 institutions or 26 percent of initial applicants in the past six years have not -- have been denied accreditation. The commission does not hesitate to require initial
applicants to teach-out campuses or academic programs that do not meet ACCET's completion and job placement standards prior to approval and accreditation.

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

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

The commission has been a leader since 1989 in establishing bright-line measures for program completion and job placement rates, currently at 67 percent and 70 percent, respectively. The annual reporting of all Title IV asset institutions in 2018 indicated that the average aggregate completion rate was 71 percent, with job placement rates at 75 percent. In
Conclusion, ACCET's scope and diversity of membership remains constant, as does its focus on student outcomes.

In the last six years, the size of our commission has been expanded from 13 to 15 members. We have seen revisions to policies for clarity purposes and have improved the process for institutions that seek to transition from for-profit to non-profit.

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

MS. HENDRICKSON: Good morning. I'll be presenting a summary of ACCET's decisions, activities, process for monitoring potential risk factors, and efforts to improve program and institutional quality and to facilitate
innovation. Since ACCET's previous recognition review in 2013, the ACCET accrediting commission has taken vigorous actions, including the following. As previously mentioned, 26 percent of applicants were denied initial accreditation, and 5 percent of ACCET institutions were denied re-accreditation.

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

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

Three hundred and one grants of re-accreditation were awarded, with 35 percent of the institutions receiving a five-year grant, 65 percent a three-year grant, and less than 1 percent
a one-year grant. A majority of institutions awarded grants of accreditation were initial deferred for at least one cycle. This allowed institutions to take the actions necessary to demonstrate compliance. Thirty-seven follow-up visits were directed by the commission, including announced and unannounced visits, often to investigate student complaints against the institution.

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

A potential risk factor analysis and summary with 14 potential risk factors identified are prepared at each commission meeting. The analysis identifies, for all ACCET institutions, not just those on the commission agenda, whether each institution has any potential risk factors.
The risk analysis provides another tool for monitoring institutions, ensuring consistent data-driven decision making by the commission and providing a holistic view of the health of ACCET's membership. It's significant to note that two thirds of ACCET's institutions had no potential risk factors, based on an analysis prepared for the December 2018 commission meeting. To improve program and institutional quality, ACCET provides enhanced training opportunities to member institutions through webinars and online training modules, accreditation workshops and conferences, and commission guidance through new and revised policies and detailed -- very detailed commission letters.

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

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

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

Since 1989, ACCET has established bright-lines regarding satisfactory student outcomes, specifically requiring 67 percent completion and 70 percent job placement. ACCET criteria dictates that a graduate cannot be
measured as placed until verification is completed
to demonstrate 30 days of employment
post-graduation in a training-related field.

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

To address the increase in initial
applicants with larger student populations, in 2017, the commission piloted an enhanced verification process for all large campuses, requiring an additional team member dedicated specifically to reviewing placement documentation and conducting those employer phone calls. Additionally, third-party verification may also be directed.

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

However, if rates do not improve, additional sanctions may be issued, including
limiting program enrollments and program approval withdrawal. In the past six years, 123 programs were issued a programmatic probation as a result of below benchmark rates, with nine program approvals being withdrawn by the commission as a result of continued below benchmark results, demonstrating that the vast majority -- that's 92 percent -- of programs placed on probation show improvement in student outcomes at subsequent commission meetings.

Our members do face challenges in achieving our rigorous benchmarks, including fluctuating job markets and maintaining communication with graduates whom are often part of a population in transition. To support our members, ACCET provides online completion and placement webinars, in-house workshops, conference sessions, and routine staff conferrals to review policy and share best practices. As Bill mentioned in his opening remarks, the most recent completion and placement results for calendar year 2018 demonstrated an overall completion rate for
all Title IV eligible institutions of 71 percent completion and 75 percent placement. I will now pass this one to Mr. John Shaheen, who will provide a summary of ACCET's complaint review process.

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

All schools must publish the ACCET-compliant policy and contact information in their catalog and post it in a readily accessible, prominent location at the school. We also have a student page in our website with a direct link to the complaint contact information. We accept complaints from current students and employees, as well as from students or employees that have been separated from the school for up to two years, barring extenuating circumstances. We accept
complaints from other agencies, from members of the public, and from anonymous sources.

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

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

Complaints closed with merits since an institution's last grant are reviewed by on-site visit teams to ensure that resolved issues are still operating within ACCET standards. Here's a quick summary of complaint activity within the five-year period 2013 through 2018. We've
processed 241 complaints, approximately 40 percent were closed with merit, 51 percent without merit. Four percent were referred to the commission at any one time; about 5 percent of complaints remain open.

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

CHAIR KEISER: Do we have any questions?

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

DR. LARKIN: Judy, would you like to do that? The most recent complaint issue, the result of which we only found out about yesterday, involved an institution who was denied re-accreditation and who alleged a number of
violations to the department. In a three-month review, the department was able to determine that all of the issues that were raised lacked appropriate merit, with the exception of one where, in a minority of cases, usually for good reason, I might add, we did not meet our own established seven-day deadline of responding to a complainant.

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

We needed to do due diligence in order to identify the aspects of the complaint that had relevance to our own standards. Sometimes, that just takes a lot longer to do. We recognize that we want to do better about that, and we recognize, also, we need a little bit more time. We self-imposed a deadline that just, when the volume increased, of complaints, we were not always able to meet it.
MS. HENDRICKSON: I might add that in that complaint, there was allegations that the institution was denied due process and that the commission -- I mean the department staff actually came and observed two appeals hearings that were held this month before they made their final determination.

CHAIR KEISER: Federico.

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

The question there is what are you basing those benchmarks on, and do you periodically go back and review whether maybe they should be adjusted? Then very specifically, I heard the benchmark of job placement. I didn't hear anything on wages. Is that a consideration? Are you considering that, maybe, as an ROI measure down the line?
MS. OAKDON: Great questions. I'll respond to your first question, relative to the specific percentages that are utilized. In 1989, our completion and job placement criteria was established and a review of all of our institutions and program outcomes was taken under consideration at that point. Sixty-seven percent completion and seventy percent job placement seemed like the appropriate benchmarks for our schools, as it required them to push a little harder, but was still attainable.

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

When I first started, institutions had three months to report on their placement statistics. We have now given them four months. But the percentages, themselves, have held strong, and our institutions are able to meet them. We're quite proud of them. Number two, second question, we do not require our institutions to track graduates' wages once they are employed. What we do require is that those jobs are training related, so they have to align with the objectives in the catalog for which the student graduated from that program, and it must be 30 days to ensure that the student has overcome that first probationary period and is a good indicator that they will maintain that job. Wages have not been a criteria for us, specifically.

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

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

MR. PRESSNELL: Let me thank all of you for coming. I appreciate, very much, you taking the time to be here and to complete the process.

Looking at the dashboard, your success matrix, looking at graduation rates, is very positive. It's very good. The placement rate is very positive. The median earnings, as reported in the dashboard, are low. The vast majority are below $30,000 a year. I'm wondering if that contributes, as well, to your default rates. I'd like for you to address how you handle that because you've got 20 institutions with cohort default rates above 15 percent.

DR. LARKIN: First of all, a reminder that the vast majority of our students are completing diplomas and certificates, with less than 10 percent in the occupational associate's degree area. One would anticipate that our job
levels are going to be lower than many other institutions with higher degrees. The rap, sometimes, that you hear is high school graduates earn the same amount.

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

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

DR. LARKIN: No.

MR. PRESSNELL: They don't, okay. Can you talk, though, about especially those with a 15 percent cohort default rate and higher, and you've got 20 institutions in there. How are you engaging them on this issue?
DR. LARKIN: We engage them through our own conference workshops and particularly during our visits, at which time we talk about the enrollment process. We don't talk about -- we don't discuss with them just merely whether or not they do entrance orientation, because obviously, that's required, but what the content of it is and what the emphasis of it is.

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

MS. HENDRICKSON: I might add, we also look for default management plans, and we look at
default rates when we do on-site visits. It is one of the potential risk factors. At the moment, we have no institutions that are hitting the 30 percent rates for three consecutive years or 40 percent for one year.

CHAIR KEISER: Kathleen.

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

MS. OAKDON: The placement percentage is 70 percent that we require for all graduates. Our 30 days was established so that we could feel assurance that students would continue for that 30 days. They've overcome that probationary period with their employer. They've shown up to work. There's a good chance they will continue. Many of our institutions have self-imposed 60 and 90-day checks, as well; however, we only require that 30 days.

MS. ALIOTO: Why?

MS. OAKDON: A lot of our institutions
offer programs for entry-level employment. That 30 days is, again, a good indicator that those students will stay with that program for maintained employment.

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

MS. ALIOTO: I think it's great that you do. President LeBlanc was talking about how difficult it is to gather that kind of information. I think it's wonderful that you do. If we're serious about it, 30 days might not really -- I could last in a job for 30 days.

MR. SHAHEEN: Perhaps I can give you a little bit of comfort. On every on-site visit, we spend about half a day -- at least one of our professional staff spends about a half day calling employers. We call graduates as a second step, but we call the employers first. As part of that interview, we ask them how long the graduate has been with them, what they're doing, how well prepared they were, if they're still with them or
if they've moved on. We have a number of schools -- many of our institutions have a very fine pipeline, with externship to hire rates -- with very high externship to hire rates.

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

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

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

CHAIR KEISER: Simon.
MS. ALIOTO: Thank you.

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

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

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

Of course, the many industries or jobs have varying levels of salaries. I'm curious, though, if, within your roadmap as an organization, you do plan to track that, try to get more information to kind of supplement the current data that we have?
DR. LARKIN: I think it's a good observation. It's been a discussion point amongst staff. I think raising it to the level of commission discussion is certainly appropriate. We appreciate you bringing it to our attention.

MR. BOEHME: Thank you.

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

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

MS. HENDRICKSON: I can speak to that, to some extent. We've had two bubbles. One is in 2010, there was a requirement -- federal requirement that language schools be accredited.
We had a large number of institutions that came to us that had been operating without accreditation. A significant number of those denials in the last six years have been language schools that weren't able to meet the asset accreditation requirements. Then, of course, the other thing that's happened during this time frame is the ACICS issue. Some of those institutions came to us and were denied, as well.

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

MS. LEFORD: I have nothing additional.

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

MS. NEAL: I'd be happy to make a motion. I think, as this body knows, I rarely say anything nice about accreditors, but I do think that ACCET has repeatedly come in with very comprehensive and impressive reports.
I appreciate your thorough responses today and your willingness to respond to various issues by the NACIQI members. Thank you very much for that. I will move that NACIQI approve the staff recommendation to renew the agency's recognition for five years.

CHAIR KEISER: Is there a second?

MR. LEBLANC: Second.

CHAIR KEISER: Second by Paul.

Further discussion? Sensing none, all in favor of the motion raise your hand, please.

(Show of hands.)

CHAIR KEISER: All opposed.

(Show of hands.)

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

(Whereupon, the above-entitled matter went off the record at 11:44 a.m. and resumed at
1:00 p.m.)

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

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

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

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

VICE CHAIR WU: Paul has extensive notes.

MR. LEBLANC: Thank you.

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

MR. LEBLANC: Next before us is the American Veterinary Medical Association, which has been around for a long time, since 1863, and started being involved in accreditation activities in
1906. They accredit 28 schools of veterinary medicine. They're all regionally accredited. They're actually -- though it's not pertinent to our conversation -- also accredit five Canadian institutions, and it looks like another 15, I think, international institutions. Again, not relevant to this; we're only dealing with the American schools. The programs that are accredited by AVMA are using that accreditation to participate in the health profession student loan program, which is through Health and Human Services.

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

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

For the record, my name is Dr. Nicole S. Harris, and I will be presenting information regarding the
renewal petition submitted by the American Veterinary Medical Association, also referred to AVMA or the agency.

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

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

The staff recommendation is based upon
my review of the agency's renewal petition, additional information requested, and supporting documentation, as well as observations of multiple program site visits conducted by the agency in August and October of 2018 and an AVMA council meeting and training in September 2018. During the accreditation cycle, the Department received ten third-party comments recommending the continued recognition of the agency. The commenters were all external constituents of the agency expressing support of the agency's rigorous standards that assure that accredited colleges and schools of veterinary medicine produce qualified veterinarians. Also, there have been no complaints submitted to the Department during this recognition period for the agency.

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

Therefore, and as I stated previously,
the staff recommendation to the senior department official is to renew the agency's recognition for five years. There are agency representatives present today, and we will be happy to answer the committee's questions. This concludes my report.

Thank you.

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

(Simultaneous Speaking)

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

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

MR. LEBLANC: Yes. You wouldn't put it this way, but I might say a lot of what brought
them in compliance was documentation and what I might call housekeeping, as opposed to any substantial changes in policy or changes from the last renewal.

DR. HARRIS: Correct.

MR. LEBLANC: Thank you.

CHAIR KEISER: Thank you, Nicole. Will the members from the agency please come forward and introduce yourselves?

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

With me today, on my left, is Dr. Kevin
Donnelly, research advisor, Eli Lilly and Company. Dr. Donnelly is completing his fifth year and is the incoming vice chair of the council. Also representing the American Veterinary Medical Association today is Dr. Karen Brandt, to my right. She is the director of education and research division of the AVMA and the principal staff support for the council. The AVMA-COE accredits doctor of veterinary medicine, also known as DVM, and its equivalent degree programs.

The DVM is the entry-level degree for the practice of veterinary medicine and is accepted as meeting the educational requirements for licensure in all of the United States and territories. We would like to express our appreciation to Dr. Nicole Harris for her thoughtful review and guidance provided in the development and submission of our petition. The council is committed to quality veterinary medical education in the United States and ensuring programs provide a solid basis for graduates to enter the profession. Modern day veterinary
graduates are equipped with the skills and knowledge to pursue a diverse array of career activities.

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

These skills allow the veterinary medical profession to meet the grand needs of society. The council has one bright-line standard it uses to assess student achievement. That is the pass rate on the North American Veterinary Licensing Exam, also referred to as the NAVLE, the exam that a veterinarian must pass for licensure in the United States. If a college does not meet the expected pass rate for two successive years, a college will be placed on probationary
accreditation. One college was placed on probationary accreditation in the last five years for this reason and has seen significant improvement in the overall pass rate.

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

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

Those competencies are regularly reviewed. If a student does not achieve one or more of the competencies when assessed, the college must have a process in place to provide remediation.
for the students. Colleges must also gather input from graduates and employers to measure student success in the achieving of entry-level competence.

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

Student absolute attrition and one year post-graduation employment rates are also monitored to identify colleges that may be at risk. Student absolute attrition is less than 5 percent, and often 1 to 3 percent. Data collected from students near graduation in the 2018 AVMA senior survey showed that greater than 90 percent of students had a job offer or were seeking further specialized training.

Colleges who fail to comply with all elements of the standards initiate the two-year
compliance time frame and provide a plan on how any deficiencies will be corrected to the council. These colleges are required to submit reports twice a year until the deficiency is corrected. The most commonly cited standards are those related to physical facilities, curriculum assessment and review, and outcome assessment.

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

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

The plan for a proposed new veterinary medical college was considered by the council, determined to not be sufficient, and a letter of
reasonable assurance, which is required to offer
and admit an inaugural class, was denied. The
council is committed to continuous quality
improvement for not only the veterinary medical
colleges it accredits, but also its own process
in the standards. To gather stakeholder input,
the council holds a session annually at a major
veterinary conference, including the annual
student symposium, to listen to stakeholder
feedback. This is in addition to newsletter and
requests for feedback from stakeholders on
standard revisions. Thank you for allowing us to
comment, and we look forward to your questions.

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

DR. JOHNSTON: It is 30.

MR. LEBLANC: It is 30; thank you. I
was going to have to do some major math. Could
you say a little bit about debt and earnings? You
mentioned job placement rates. I was trying to
get accurate information. I see various reports,
but in 2016, I saw average debt of about $167,000, 20 percent over $200,000.

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

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

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

DR. JOHNSTON: Multiple organizations
addressing it. It certainly is a concern. As far as it being an issue for accreditation, the way that it has been addressed is that there are requirements for financial literacy that are within -- embedded within the standards, actually within multiple standards.

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

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

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

MR. LEBLANC: One of the ways that I think, in our industry, generally speaking, people
are thinking about how to get a handle on costs, costs of delivery and costs to students, is around innovation. I'm curious about the ways you think you support innovation. Do you have examples of this?

Are the standards such that schools can come to you? I'm curious about the adverse action. What are you responding to, and do you have an ongoing conversation with that entity that's submitted? In other words, do you give them counsel on how to come back to you?

DR. JOHNSTON: Regarding the financial literacy, no, we don't give them specific advice. There is the standard that they have to meet, which is that financial literacy is part of one of the standards, but as far as --

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

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

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

DR. BRANDT: If I could just add, the council tries real diligently to not make its standards highly prescriptive. By making those standards open and non-prescriptive -- which sometimes bothers some colleges because it may say sufficient access to this -- it allows colleges to do things in different ways.
For example, there have been some very interesting partnerships that have been developed in veterinary medicine between shelters and veterinary schools, where veterinary schools will have a faculty member who's actually embedded into a shelter.

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

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

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

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

VICE CHAIR WU: I was here when you last appeared. There were some concerns expressed by members of the profession. Congratulations. That seems to have calmed down. I have a question that's an entirely friendly, open-ended question, which is how did you resolve matters and address this? It was around foreign institutions, potentially online programs, that sort of thing.

The waters seem to have settled, so from your
perspective, that's great. I wonder if you wanted to share a little bit about the progress made there?

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

That has since proven not to be true.

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

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

The statistics show that there are actually very, very few individuals from that school who have even sought licensure in the United States. I believe that's basically what has happened.
VICE CHAIR WU: It's good to see.

Great.

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

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

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

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

Veterinarians, on the whole, are generally a pretty innovative group. When we look at all the various member institutions, they come
up with their own solutions and have largely -- using our outcome measures, have largely been successful in being able to do that.

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

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

MS. ALIOTO: Thank you. Too bad.

CHAIR KEISER: Any further questions?

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

(Simultaneous Speaking)

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

CHAIR KEISER: I think because of lack of questions, we should have all of our meetings after lunch. Simon, do you have a question? No?

Thank you very much for coming before us. We
appreciate it. Are there any third-party commenters, like last time? Thank goodness. Staff, would you like to come back? Nicole?

DR. HARRIS: I have nothing further to add.

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

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

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

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

VICE CHAIR WU: I second.

CHAIR KEISER: Second by Frank Wu.

Further discussion? I'm telling you, lunch is a
great thing. All in favor of the motion, signify by raising your hands.

(Show of hands.)

CHAIR KEISER: All those opposed.

(Show of hands.)

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

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

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

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

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

CEPH was scheduled to appear before the NACIQI at its winter 2019 meeting, on February 5, 2019, but due to the lapse in appropriations, the
meeting was canceled. Nevertheless, department staff completed the review of the agency's petition for continued recognition, observed a site visit at the Texas A&M School of Public Health in October 2018, and attended a council meeting in June 2018.

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

This concludes my report for the Council on Education for Public Health. A member
of the agency is present today to answer any questions you may have at this time. Thank you.

CHAIR KEISER: Thank you, Stephanie.

MS. MCKISSIC: Thank you.

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

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

The Council on Education for Public Health currently accredits public health programs in 204 institutions. Each of these 204 public health units offer some combination of bachelor's,
master's, and doctoral degrees in many concentration areas, ranging from biostatistics and epidemiology to health promotion and global health.

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

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

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

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

This vigilance at the beginning ensures
that when programs are initially accredited, they're clear in their expectations and meeting the standards. We believe that this prevents denials, probationary decisions, and withdrawal of accreditation in later years.

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

Annually, each of our accredited programs submits a report that collects key indicators related to faculty resources, fiscal and other resources, enrollment numbers, graduation rates, post-graduation outcomes, and any organizational or administrative changes that may have occurred. Comprehensive reviews, including a site visit, are conducted five years after an initial review and every seven years in subsequent reviews. Concerns about any standard in either the comprehensive review or the annual report can, and often does, trigger interim
reporting to monitor specific issues. Over the last five years, the council has reviewed between 40 and 70 interim reports per calendar year.

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

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

Our agency addresses the Secretary's criterion about success with respect to student achievement in the following ways, but it's important to note that none of these indicators, by itself, tell the whole story. We look at them in a holistic way, both qualitatively and quantitatively, to make a complete assessment.
First, we require that all units develop guiding statements, meaning vision, mission, goals, that explicitly address their approach to ensuring student success. We look at student competency attainment.

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

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

In addition, and sometimes even more helpful, we look at alumni perceptions and require all of our programs to collect data on alumni perceptions of the preparation that they received at the programs and its helpfulness in their
careers. Given the department's new understanding of graduation rates and their difficulty as an indicator when used as a single bright-line measure of success for all types of institutions, the council's begun to further analyze and stratify our graduation rate data and to consider approaches that take this into account in the context of individual programs and universities.

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

One of the strategies that we employ, which may be unique compared to other specialized agencies, is that we provide a vast array of technical assistance opportunities for program leaders and other program faculty and staff, not
only to assist them with the accreditation process, but to disseminate best practices in education. We do this through providing in-person conferences, workshops and trainings, a webinar series, and by offering in-person and web-based, both one on one and small group consultation visits to programs. While available to all applicant and accredited programs, the council often requires programs to avail themselves of this assistance when deemed at risk. All of these resources are on our website and advertised through our weekly newsletter and are very well attended.

For example, in 2018, nearly 95 percent of our accredited programs attended at least one of these offerings. Online events are our most popular. The council and staff at CEPH are committed to the success and quality of the programs that we accredit and the graduates that they produce.

We're also committed to monitoring our own performance and holding ourselves to a high standard of quality as an agency. I would welcome
any questions that you have.

MR. WOLFF: First, thank you for the presentation and for a very thorough application. I would commend you for the thoroughness of your standards. Could you describe -- I have a few questions, but first, describe what the major changes were from your earlier standards to the 2016 standards.

DR. KING: Yes, that has been our major focus over the last -- since even before 2016. We implemented, at the end of 2016, probably -- well, the most major change in curricular standards since almost 100 years ago, believe it or not.

We went from a core -- almost a core curriculum prescriptive type model, so looking for core classes, if you will, to a competency-based model and focused, really, on -- did a thorough assessment of all of the available information, including job task analysis that had been done in the field for the first time to establish foundational competencies for the MPH degree and
20 foundational competencies for the DRPH degree.

Then laying on top of that is the foundational knowledge, so it's a very skills-based education now, as opposed to a content-based education, which we believe serves students in the field, the workforce, in a much better way. But I will tell you it's been -- it's turning the Titanic with getting over 200 institutions to change their -- the focus of their education from being very content based, sage on the stage, teaching what I want because I've always done it this way, to really focus on student outcomes and student skills, in the end. That's the thumbnail sketch.

MR. WOLFF: Thank you. I wanted to follow up on that. Because I looked at some of the reports that you have the pre-standards and the new standards. It looks like an extremely detailed and thorough review of each of the competencies. I have, actually, a few questions to try and understand it better.

One is that I really like the approach
you have not only to assess each of the competencies, but to demonstrate that the students have actually achieved it.

I was just curious to know, given the nature and the magnitude of the change, how have you been able to actually assess, in each of the 12 plus 22, and then there are the additional 5 areas that each program can select on its own, which seems like a massive undertaking of not only assessment, but demonstrating achievement and, as I understand your standard, demonstrating that all students awarded the degrees need to demonstrate that they've met each of those competency areas? How are you doing it, and how is that going?

DR. KING: That's quite an undertaking, as well. We have been -- we're in the process, still, of implementing. Our programs had two years from the adoption of those to change their curriculum and submit to us what we called a compliance report.

Every program that we accredit either underwent a full site visit using the new criteria,
or they had to submit to us a compliance report on just those competencies. Then we actually went through two rounds of those compliance reports. That, we just did an immense amount of education around that.

We offered small group consultations, so they could share best practices. We would review some of the drafts of things that they had. We did a lot of consultation visits related to it, so that they were able to -- the faculty were really able to understand what we were looking for, and then make adjustments related to that. When the self-studies come in, we do a lot of triage at the staff level. My staff is a staff of ten. It's all very program heavy, so it's program-focused. I had a team of accreditation specialists who are looking through each of those competencies, every single syllabus, and verifying that the assessments look plausible, that the students know what they're expected to be able to do at the end of their program, and that there is an assessment opportunity in that program that
addresses that exact competency.

   It's a real one-on-one analysis, and it takes a lot of time, but it's worth it. I think there was a lot of -- as you can imagine, when you change something so dramatically, there was a lot of skepticism, pushback at the program level. Eventually, we've gotten the early adopters on board. Now we're getting the mainstream bulk on board.

   We've still got a couple of the outliers that are still working hard, and we're giving them some extra handholding, but everyone's coming through it. We're actually hearing some really positive comments about the way it's both engaged the faculty and the students around the new curriculum.

   MR. WOLFF: Thank you. It's very thorough, and I appreciated the competencies. They're very clear. As I read through the reports -- let me see if I understand the process. The team actually goes through each of the competencies and writes their findings, goes to
your council, and your council then takes the
response and they make modifications that's then
found in your letter.

It seems as if the council is actually
doing very thorough work of taking the team report
and the response, and then the letter actually
reflects their response, the council's response
to the response.

DR. KING: That's correct. That's the
new report format I think you're referring to,
where it's sort of all there. It's the team's
report, and then there's a column for the program
response, then the council response, so it's all
there. Our reports are public information.

MR. WOLFF: I wanted to commend you
that you're one of the few agencies where you
require that each program or school put your report
on its website, and your decision letter. I have
one concern. That is when I tried to find your
standards, I had to have a password to get them.
I could not get your standards. They only had
general areas on your website.
DR. KING: You mean the criteria?

MR. WOLFF: The accreditation criteria. I'd urge you to look at that.

DR. KING: Oh, no. Everybody go.

MR. WOLFF: I looked at every which way where it said the standards. It only gave the broad titles, but not the actual details. The only way I got your standards was through the attachments to the department's report.

DR. KING: You might be referencing -- because that's definitely not the case. I go there all the time because that's how I access when I need to reference the standards. You may be referring to -- there is a self-study and final accreditation report -- what do I want to call it -- archive on the website that you have to request a password to get into. That is the complete library of them that all of the schools and programs can access.

MR. WOLFF: Separately, I'll show you -- go on the computer and show you why I'm having that problem.
DR. KING: All right.

MR. WOLFF: I tried mightily, based on your website. The other thing I just want to say -- but I really do commend you for where you're going. How do you follow up -- we just heard from ACCET about their follow up on site on employment and employers.

How do you follow up on the outcomes around employment? Do you do independent verification in the site visit, rely on what the programs provide? How do you address that?

DR. KING: We do rely on what the programs provide. We don't do independent verification of that.

MR. WOLFF: I take it you've not had any problem. You also do alumni surveys, so I would assume that you would have serious problems from the alumni if they weren't able to get work or the like.

DR. KING: Yes, absolutely, we do. We require that the programs do alumni surveys and look at those job placement outcomes. We look at
those both quantitatively, as well as qualitatively. One of the struggles that we do have is -- and I'm sure other professions of the type that we are might have this problem, as well, but we have difficulty -- our programs have difficulty getting information from alumni, so we're working them through strategies to do that.

Really, social media is one of the best strategies that we've found to be able to do that.

They do a holistic tracking of alumni.

They not only do the survey from alumni, but then they'll also do LinkedIn, Facebook, that kind of thing, to try to figure out where their alumni are going. But no, we have not had -- our graduates get jobs in everything you can -- every kind of sector and type of job that you can imagine, simply because it's so broad, the kinds of concentrations that we have.

MR. WOLFF: I wonder, also, are you tracking the amount of student loan debt? Particularly, there's concern about graduate programs, doctoral programs. Students graduate
with a cumulative enormous amount of debt and their capacity to repay.

DR. KING: We are not. We don't ask for information about tuition, debt, faculty salaries. We really don't deal in the finance area. The school's association does track some of that information, but that is not something that we look at in the accreditation process.

MR. WOLFF: One other question is you have a conflict of interest statement that's quite thorough, I would say, but that's, in large part, because you also provide a cadre, it seems like, of consultants to programs, so you're distinguished between staff consultation and third-party consultation.

I just wonder how that's going, in terms of avoiding -- when you recommend a consultant, saying we told you that, but then the team might find something different, or the council.

DR. KING: We get that question a lot because I think my agency is a little bit different, in that we do provide pretty extensive staff
consultation. We have very strict rules against any consultation that comes from the decision maker.

There is no consultation that happens for any of the decision makers. The third party -- we rarely recommend any third-party consultant. It's really primarily my senior staff that work with the programs in a consulting way. It's also sort of a line between what we would consult on. For example, we would give them our best judgment about whether or not a particular assessment of a competency is going to satisfy the council.

We would give them that, but if they wanted us to help them develop competencies, we would not do that. It's very accreditation-focused, the kind of consulting that we do. We also focus a lot -- and maybe this gets to questions I know have folks have about innovation.

We focus -- we also -- listening to AVMA, we believe our programs really do innovate
really well, but I don't know that it's shared very well. A lot of what we do is really facilitate program-sharing with each other the innovations that are emerging. That's the other part of a lot of those webinars that we do and other kinds of workshops and training.

MR. WOLFF: Thank you.

CHAIR KEISER: Just to clarify, I was able to pull up the criteria on the website.

DR. KING: Thank you.

CHAIR KEISER: You must have a firewall problem. I think Jennifer, too. She's got it there.

DR. KING: I'm really glad to hear that.

CHAIR KEISER: We just want to make sure we're accurate. You have a firewall issue. Sorry. Questions from anyone? Frank.

VICE CHAIR WU: My understanding is the master's degree enrollment in your field is declining, but bachelor's degree enrollment is going up dramatically and the number of programs
is going up. I wonder if you want to speak to that.

Is the decline in the primary master's degree program a concern? Is it not a concern? As an accreditor, do you care? Do you not care?

DR. KING: That is absolutely true. Let me think how -- again, our agency is very separate from the schools association, who mostly collects those data. When we look at student enrollment, we're really just looking at it in terms of capacity for the program to offer a quality education. We're looking at faculty versus students, that kind of thing. The schools association looks more at trends. I do know that they see the trend being about -- I'm really gathering this from the back of my brain -- about 3 percent drop in the number of applications at the MPH level, but it is growing at the baccalaureate level.

There's also some interesting changes at the master's level, in terms of where students are applying and are they applying close to home or all over? It's sort of interesting, but I do
see that a bit on the decline. The undergraduate programs have been sort of festering for years.

I think -- I can't remember how many years ago, less than ten years ago, we began to accredit at the undergraduate level because a lot of our -- a lot of the rural areas in the country, health departments, for example, local health, they were hiring at the undergraduate level.

There really weren't -- there weren't a pool of public health graduates to hire from, so they were hiring people with bachelor's degrees from all different kinds of fields and training them there. They were demanding that they have some quality assurance for those bachelor's degrees, so we began to do that. The field has really been, up until about a decade ago, only kind of recognized at the master's level. I think you're sort of seeing the natural progression of our field. Yes, we are still getting those undergraduate programs on board with accreditation. Many of them come out of the humanities, so programs that are not used to the
accreditation process. They're taking a little while to get them up and running.

CHAIR KEISER: Any further questions?

Kathleen.

MS. ALIOTO: In your curriculum, is there any discussion about the opioid crisis?

DR. KING: I would say yes, absolutely. Our curriculum is skills-based, so there is no particular topic of any sort mentioned in our criteria. However, I do know that through case studies and other items, they are absolutely talking about the opioid crisis.

It's a huge public health crisis. Public health's contribution to working on that crisis is really so that we have data related to it. Public health folks are the ones collecting those data and figuring out how to communicate them and working with other health professionals on policy issues, that kind of thing. Public health, we are not prescribers or don't have any of those kinds of responsibilities, so our role is really kind of tracking the epidemic.
MS. ALIOTO: Thank you. Also, does any of the curricula deal with patient-provider relationships?

DR. KING: No, because public health is not -- is other than patient care. While many of the health -- most of the health professions are kind of patient-related, individual-related, public health is population-related. That is not something that we address at all.

MS. ALIOTO: You mean it's more theoretical than with people?

DR. KING: No, in public health, the population is the patient, whether that population is a community or the population is a school, the population is the patient. There's not an individual patient relationship in public health. It's more of a policy, education, data, those kinds of things.

MS. ALIOTO: Thank you.

CHAIR KEISER: Federico.

MR. ZARAGOZA: You noted that you have a 70 percent graduation rate standard. Then you
also indicate that you've got some post-graduate graduation measures, as well, including job placement, but you don't have a standard there. My question is what do you do with the data that you collect?

DR. KING: We do have a standard around job placement. It's post-graduation outcomes. Many of our -- particularly the undergraduate students, many of the master's students continue their education, so that's also considered a positive post-graduation outcome.

We require an 80 percent threshold on post-graduation outcomes. Then graduation rates, depending on the degree level, it's either 70 percent for master's and bachelor's degrees, 60 percent for doctoral degrees.

MR. WOLFF: Browser issue.

DR. KING: I knew that. I knew it was not -- (Simultaneous Speaking.)

MR. WOLFF: No on Firefox, yes on Chrome. I do wonder, on a more general area, how
do you do with the politically charged issues around family planning and the abortion debate that's now being legislated a lot? Do you allow your schools, or is there any way in which you -- is there a free speech issue, or has that proved to be a political issue in any of your schools? Because it's certainly a hot-button political issue.

DR. KING: It's not one that I -- that is not one that has ever risen to my attention. I'm positive that those are things that they talk about, in terms of education around policy in the schools, but no, that has not risen as any kind of concern or difficulty with them discussing it or teaching about it.

MR. WOLFF: I'm done.

CHAIR KEISER: Good. Any other questions? No. Rick? Thank you very much. Any third-party comments? No? Member of the staff, come back. Any comments on the presentation?

MS. MCKISSIC: I have no additional comments, thank you.
CHAIR KEISER: Okay, primary readers, is there a motion?

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

MR. O'DONNELL: Second.

CHAIR KEISER: Motion is seconded. Further discussion/questions? Sensing none, all in favor of the motion raise your hand.

(Show of hands.)

CHAIR KEISER: All those opposed.

(Show of hands.)

CHAIR KEISER: Good. Take a ten-minute break?

PARTICIPANT: Yes.

CHAIR KEISER: It is time for a ten-minute break, and then we come back and have a very interesting discussion led by Claude that was ready last February, but we didn't meet.

(Whereupon, the above-entitled matter went off the record at 1:59 p.m. and resumed at 2:10 p.m.)
CHAIR KEISER: If you could all please take your seats, we'll get started. At the last meeting, an issue was brought up and we had a long conversation about -- specifically, it was one issue on the conversion of institutions that converted from non-profit to for-profit. The conversation expanded and a subcommittee was formed to discuss substantive changes, in general, and some specific issues within that. First of all, I want to thank the committee because the committee's had a number of meetings that were there. It was very lengthy discussions, follow up with different agencies.

I want to thank everybody who was involved, staff and members of the committee. At this time, I'd like to present Claude to make a report on the subcommittee on substantive change.

MR. PRESSNELL: Thank you, Mr. Chairman. As has been a recurring theme, I should note that this was supposed to be given at the February 5, 2019 meeting, but due to the lack of appropriations, we were unable to meet. That just
sounds so official coming from them, so I thought I'd try that again.

Just to make sure everybody does understand the context, it was to be delivered at that time. As the Chairman noted, this was really in response to the session from May 2018 on the oversight of for-profit institutions converting to non-profit entities. The committee heard an extensive number of comments on this issue, and we took those comments very seriously. As a result, the Chairman called for a subcommittee to take a look at substantive change, and particularly looking at the conversion of institutions moving from for-profit to non-profit. The subcommittee, I don't remember raising my hand, but somehow I ended up chairing it. That's what happens --

CHAIR KEISER: Prerogative of the Chair.

MR. PRESSNELL: Yes, that's right, prerogative of the Chair. As a subcommittee, we did have numerous phone conversations to discuss this issue. We talked, as well, about the current
regulations related to substantive change.

Then we hosted some calls with a regional accreditor and representation from CRAC to better understand the current scope of practice and frequency related to the tax status change request. Subsequent to the May 2018 meeting, the subcommittee became aware of a study being done by the Government Accountability Office, GAO, that they had initiated related to this particular issue, and also the Secretary had called for negotiated rulemaking related to accreditation, which we heard from the undersecretary today about the results of that. Therefore, we felt as if we should put our inquiry on hold with what we knew at the time and see how the outcomes of those two initiatives would be.

Consequently, what we -- based on the subcommittee's discussions and considering those ongoing evaluations, we decided just to offer up some observations, rather than any definitive conclusions. The first one is that the regional
accreditor consultant indicated that there are multiple levels of review which occur when an institution seeks substantive change resulting in tax status conversions from for profit to non-profit.

These begin with preliminary conversations prior to the formal review, pre-application reviews, formal review of the process, with a site visit to the institution. If the change is approved, there's a mandatory follow-up, following the implementation of the change. The accrediting associations undertake a review of the impact on governance, academic quality, the availability of financial resources to ensure that the quality will be maintained, and, if needed, additional financial expertise is brought in for these reviews. The accrediting agency also consults with officials responsible for such reviews at the U.S. Department of Education.

The subcommittee was advised that there is really good flow of conversation and information
between the department and the regional accreditors as it relates to this particular issue.

It should be noted that not all proposed conversions have been accepted, so there have been a number of them that have been denied. Obviously, we know some have been accepted, as well.

In certain tax status change requests, the creditors have identified that, when changes are needed, which led to changes in governance and has led to changes in ensuring academic quality.

The focus on the final reviews in such conversions is on the assurance of adequate resources to protect the integrity and the quality of the academic programs and student support. In sum, the subcommittee was satisfied with the depth of substantive quality of the review conducted by the regional accrediting associations, and we feel like it was appropriate in the role of assuring quality and integrity of accreditation.

Given that review, we believe that the accrediting agency should primarily be concerned with institutional integrity, transparency of
operations, and programmatic quality. Tax status should not enhance nor diminish the review of an institution's compliance with the criteria of accreditation.

Proper control of the institution's programs and contracts, transparency in governance, and resolution of conflicts of interest are all key components to the accreditation process.

If, however, the peer review system's not adequate in evaluating the complex financial control issues, the agencies should continue to seek outside expertise to assist in that review.

Next observation was that the interdependency among the accountability agencies is critical. Often referred to as the triad, institutions are held accountable to accreditors, federal government, and state government; whereas, the accrediting agencies focus on quality of programs, institutional capacity to meet the state admission. The U.S. Department of Education and the Internal Revenue Service and states also hold
a responsibility in ensuring campuses follow proper procedures when approving the change in institutional tax status.

Students and families heavily rely on this independent interagency review to protect them from fraudulent activities. We mentioned the triad because each group has a very critical role to play within that. Current statutory and regulatory requirements provide for the accountability structure noted above.

The subcommittee feels as if the current structure’s adequate if all the parties involved in the approval process adequately fulfill their oversight role. Should Congress seek to more strictly address the tax status change issue, legislative action would need to be considered. Concerning the more broad issues related to substantive change, the subcommittee points to the previous paper that was issued in February 2018, wherein NACIQI offered guidance on deregulating and reducing unnecessary costs embedded in the accreditation process.
Specifically, the report noted that to further encourage institutional responsiveness and innovation, the committee believes that substantive change and additional procedure report should be managed in a risk-informed approach.

Consequently, the committee recommends that they allow accreditors to limit the kinds of substantive changes that would require approval by accreditors for high-performing institutions.

Established institutions should have flexibility to make changes necessary to address the needs of their students, also to allow accreditors to limit additional procedures for high-performing institutions to only those cases where substantive changes are when a branch/campus are up for re-accreditation or accreditation reviews.

Then the final thought was that NACIQI will continue to monitor the issues related to substantive change. The committee will be paying particular attention to rulemaking activities related to accreditation and the results of the
GAO study. Mr. Chairman, that is pretty much the report from the subcommittee.

CHAIR KEISER: Thank you, Claude. Questions? Most of you were on the committee, but are there any specific questions that you may have? We have one public commenter who would like to make a presentation. Bernie?

DR. FRYSHMAN: I guess I'm at a little bit of a disadvantage. I did not figure that I would hear all about the conversion. I'm not very adept at that whole area, tax status and the like, but I thought I would just make a few comments about the manner in which substantive change was placed in the regulations and what it means for us, as accreditors.

Basically, I think that the department and NACIQI, working with the department, should take a more trusting approach to this part of the accreditation process. We're trusted to receive schools in initial recognition.

We are trusted to make decisions, sometimes subjective decisions, with respect to
renewal of recognition and, very often, about making decisions regarding sanctions. The same approach should really take place with respect to substantive change. Agencies know their schools, to a great extent. I run a small agency, relatively small. We have a pretty good idea whether a school is big enough and strong enough to undertake a substantive change, whether it be an expansion of a program or an additional location.

To have to go through a whole litany of prescriptive activities just because it says so in the guidebook is really not very productive. I guess my comments would be that we should be much more expansive. Of course, there could be a trust and verify. The NACIQI could ask that there be a list of substantive changes that have been taking place.

Then when people are up for renewal of recognition, somebody might say what took place at this particular substantive change and was it successful and what were the circumstances which
were discussed. These are areas which could lead to a piercing of the paper curtain.

Sometimes, there's a paper curtain which papers over the realities of what takes place in accreditation, as accreditors check off all the boxes, provide the 60,000 pages of documents, and except for the people who are the staff, except for staff, which really does go into the realities of an accrediting body, the community, at large, very often misses what is really taking place. This is particularly true in substantive change.

If there were a re-orientation of how substantive change would be addressed, so that, as I said earlier, the agency would be trusted to carry out its responsibilities responsibly and, at the same time, NACIQI or the department could zero in on some randomly selected substantive change, I think a great deal more insight would develop and, at the same time, the process, I think, would be much more effective.

There are other areas that one could speak about. One of them is that I think we should
always remember that regulation and law are just
guides in education. They're not to be barriers.

So good sense should always play a major role in
all the things that we do, and reality beyond the
paper curtain should also take place. Thank you.

CHAIR KEISER: Thank you, Bernie. I
think Claude -- I think the report addresses that
a lot. Go ahead. You want to explain?

MR. PRESSNELL: Yes, I will, and not
only that, but the report we did on deregulation,
I think, addressed it even more pointedly. That
was done back in February, I think, of '18, is when
we presented that. Those last two elements, we
kind of reiterated those. Now I want to kind of
get your feedback on the idea of risk-informed
approach.

And that was our thought, was to allow
accreditors to take a little bit more of a
risk-informed approach to substantive change, so
that it allows for innovation, quicker response
to programmatic needs an institution may have.
Not only that, but may allow accreditors to focus
their resources on institution in a higher need position and assist them out of that, if possible. Do you have any thoughts on that?

DR. FRYSHMAN: Just one. I thought I mentioned it in passing. There should be a verify aspect, as well. Innovation is important. Innovation is sometimes necessary. But not all innovation works. There should be some way which government, the department, NACIQI, somebody should be looking at an innovation saying what happened? Did it succeed? Let's spread it. If it didn't succeed, let's see why it didn't succeed, and so forth. The trust is very important, the verify is just as important.

CHAIR KEISER: Jennifer?

MS. HONG: Just to follow up on the two outstanding issues, for the -- under rulemaking, the substantive change provisions were largely unaffected. I think there was a minor change regarding the contracting out with outside entities provision.

That was fairly minor. As for the GAO
study, I believe that's still ongoing. We haven't heard any closure with that. But as soon as I do, I'll be happy to report out.

**DR. FRYSHMAN:** It seems to me that NACIQI has a certain flexibility, if not pushback, at least to be heard and to transmit the feeling of the community to the department, so that whatever flexibility remains in the regulations and in the law should be imposed.

Sometimes, the accredditor is stuck. I have to address the regulations, and I have to follow the guidelines. I have to satisfy staff. I come to NACIQI and you hear the paperwork. You hear the recommendations. But nobody really looks deep -- deeply. I've often suggested that NACIQI should meet informally with accreditors, not just across the table, but just as colleagues and have some conversations, maybe ask to come on a visit at one time. That could also be helpful.

I've suggested that journalists and legislators participate in decision-making meetings or on-site visits, so that accreditation
is not some abstract target for people to go attacking, but something real to see that all of us are doing a very, very difficult job with a lot of dedication and that the taxpayer is being served by accreditation. But that's extra.

CHAIR KEISER: I couldn't agree with you more. I do believe, just listening to Diane this morning, there will be some opportunity for agencies to innovate, for agencies to look beyond just what's in the statutory requirements and soften some of the regulations that we have been dealing with over -- at least since I've been on the committee. Susan?

MS. PHILLIPS: It's just a question for Claude, not for our commenter. In the committee's discussion, subcommittee's discussion, I know one of the concerns about the substantive change of conversion has been the capacity of the agencies to have the expertise to evaluate whatever contracts or new novel arrangements there are that come out of a conversion. I wondered if you could speak a little bit to what you learned about the
agency capacity and what reassurance there is about that.

MR. PRESSNELL: Yes, we actually talked about that at quite a bit of length. What we found out with the regional group that we talked to is that they feel very enabled to bring in additional expertise if they need to do that, if it's a very complicated financial transaction in the tax status issue and exactly how that's going to play out, in terms of ownership of particular contracts, whether or not the academic program remains intact, but they're going to subcontract all of the student services pieces types of things.

Then they tend to seek outside financial expertise to be able to advise them on potential conflicts within that, and also whether or not the resources, as a result of the conversion, would still be in place to make sure that the programs -- the program quality can be maintained, which was I was pleased to hear that once they realize it's outside their scope, they feel good about going --
MS. PHILLIPS: Same true for what was formerly known -- the national accreditors -- I'm thinking about the full scope of institutional accreditors here, not just the regionals.

MR. PRESSNELL: We did not actually look at -- we didn't have any conversations with any institutional accreditors at the national level. It was all at the regional. It was somewhat limited. We did this in a pretty short period of time.

MR. BOEHME: Does anyone -- I want to be respectful of our speaker's time, if anyone has any questions for him. Thank you.

CHAIR KEISER: Thank you. We will go with Simon first. Then we will go with Jill, and then we will --

(Simultaneous speaking).

MR. BOEHME: I'll yield -- I'll go after Jill.

MS. DERBY: I don't know why you're doing that, but I will --

MR. BOEHME: I like you, Jill.
MS. DERBY: I don't know if they're related at all, but I just wanted Claude to elaborate a little bit for me about --

PARTICIPANT: The mic. Jill, the mic.

MS. DERBY: Oh, there it is, okay. If you would elaborate a little bit about the risk-informed approach to substantive change. What might that look like?

MR. PRESSNELL: I would -- I'm just shooting from the hip here as a possibility. I'm sure that we can punch holes in it over time. But if you've had an institution that has had multiple reviews for which there are no or very minor findings over a long period of time, then they would be considered a very low-risk institution, so they ought to be able to move a little bit quicker.

They're still keeping everybody informed. They're still submitting annual reports to their accreditor. But instead of saying you can't move until we come and approve, we allow some movement to take place, within reason, to expand the programs versus someone who
is -- I don't even want to say on sanction, but
maybe had been on sanction, and so forth, who needs
to be -- they would be a little bit higher risk
institution.

CHAIR KEISER: Jill, just to remind
you, some of those recommendations came out from
a previous committee from this one. These have
been in the process for a while.

MS. DERBY: But nothing has been
adopted is what I heard --

(Simultaneous speaking).

CHAIR KEISER: We don't adopt
anything.

(Simultaneous speaking.)

CHAIR KEISER: We just make
recommendations.

MR. PRESSNELL: But we did vote on the
first report --

CHAIR KEISER: Yes, we did vote.

MR. PRESSNELL: -- and we did vote to
accept the first report to go to the secretary.

CHAIR KEISER: Right. Then Simon, are
you going to yield to Kathleen --

(Simultaneous speaking)

MR. BOEHME: No, I like you, too, Kathleen. I'm sorry. First of all, I just want to say hats off to Claude for being a tremendous leader, and also to the Chair, Art, for allowing us to explore this issue because it's really gained a lot in popularity. Eventually, I'd like to turn this into a motion, but maybe just to kind of spark this and keep the conversation moving, in terms of action items, in terms of moving forward. My colleague, Susan, asked a really good question. We didn't speak to national accreditors, which I think is a worthy exploration.

I think as we go through this period of learning more about the topic, there's still more to uncover. We're certainly not at the point of making any recommendation. I think the cadence we're moving at is good to continue to talk with more people.

So I would like to propose three steps. Of course, I won't be here, unfortunately, to see
it. But the first one is develop a list of best practices for accrediting agencies considering a -- non-profit conversions and for the department to consider them.

I think the second is considering in the spirit of our pilot by asking accreditors a certain set of questions, we could also adopt a similar fashion to that. We could make it very simple. Have you done any conversions since you last came before NACIQI? They can report the number, or they can go into depth as much as they like. I think the third would be to just revisit the issue with a survey to institutional accreditors, including national accreditors, to get more information. Of course, this may conflict with the GAO report that's being conducted, and we can wait until that. The third option, maybe we could wait.

CHAIR KEISER: Just if I may comment on it. The total number of conversions are, I think, less than 20 out of a cohort of 3,000 institutions. It is a very specific issue to a
very specific subset of schools within a very specific subset of the community. I think we also got the report -- I don't know if you did, but I got it from one of the nationals.

In fact, an even more robust process, in terms of board membership in a for profit/non-profit conversion. We can continue the conversation, but again, it seems to me -- I think Claude did a pretty -- and the team did a pretty exhaustive view of it. I'm not sure what would be your purpose of moving forward with it because it's such a small subset.

MS. HONG: Just to add to that, the focus on the regional accreditor was rather deliberate because they had conducted most of the approvals for the conversions that had far-reaching consequences.

MR. BOEHME: No, absolutely. I think Claude did a tremendous job. While I may agree it is a subset, maybe it's just adding one question to the pilot, and that's it. Of course, I think a lot of this does rely on -- it's a very
case-by-case basis. I think these three action items are only for talking points if the committee feels so inclined, but they're just ideas.

CHAIR KEISER: Further discussion?

MR. PRESSNELL: One thing that we really wanted to make sure that came out of this report is that it is not solely the accreditor's responsibility to be the ultimate gatekeeper of this activity.

They have a lane to play in, and the IRS does, too, and the Department of Ed does, and our states do. Part of that one bullet was, and the reference to the triad was that everybody needs to wake up on this. It's not just here. We were actually -- I think many of the committee members -- I can't speak for all of them, but I was rather impressed with what, at least, the regional group, the processes they would go through. It wasn't just all of a sudden boom, here it is. It was pre-visits and pre-investigations.

Then it was a site visit, and then approval. Then there would be a follow-up site
visit. The biggest concern I had was whether or not there was sufficient expertise at the accrediting level for that. Then when we would press them on that, the response was we would bring in someone who is an expert in that type of arena.

You think -- I thought that's pretty good, in light of the fact you've also got the IRS looking at it, and the department's considering it. You would hope that states would raise concerns if there were concerns to be had.

We've seen conversions take place, and they've gone well. We've seen conversions take place and it's been a disaster. What we want to try to do is make sure we avert disaster in the future.

MR. BOEHME: Then, I guess, maybe in response to that, it's just offering best practices as suggestions. I think Claude has uncovered a lot of great research. Maybe if we turn into a one pager of -- rather than offering a recommendation to -- following our responsibility that we advise the secretary, we could just say
here are some very broad best practices, as it comes to that.

Hopefully, it's a useful instrument for accreditors to make sure that they're good conversions. I would just -- I guess maybe my only push for this is just we should leverage the expertise we have here to encourage practices that are filled with integrity and hiring outside consultants. But again, just an idea.

CHAIR KEISER: Well said. We should submit the report to the secretary.

PARTICIPANT: Mics.

CHAIR KEISER: I think it is a report of the whole -- I guess if we want to approve it, we could approve the report and submit it to the secretary for her consideration, since that's what we do is advise.

MR. PRESSNELL: Simon's suggesting maybe as a follow up, maybe is to try to put together a one pager that might serve as some best practices, which would take a little bit of additional work to talk with those regional, or even national
groups that have actually gone through that. That would be a healthy exercise for even us, as a body, to see what exactly -- how that was processed. I'd be happy to work with Jen on that.

CHAIR KEISER: Oh, good. Thank you for volunteering.

MR. PRESSNELL: I think this may have happened last time, too.

CHAIR KEISER: Jennifer.

MS. HONG: We just have to look into the survey aspect of gathering this information a little bit further. We might run into paperwork burden issues, as well as -- we're tentatively scheduled for our meeting in February. We also want to look at the calendar, see what our time frame is like.

CHAIR KEISER: Frank, or Anne. Sorry, Anne was first, Frank.

MS. NEAL: Just a quick observation. Rick and I were having lunch together. We were saying that when there are best practices, or when there are systems in place with community colleges,
by way of example, that show student success, it would seem to be an appropriate activity for accreditors to compile best practices and make them available to the other institutions that they oversee.

It would seem to me that would be a very valuable endeavor. I don't know that we really see it happen very often. So while we're sitting here talking about compiling best practices, why would that not be an appropriate activity for accreditors to help promote student achievement and all the other good things that we're trying to promote here?

VICE CHAIR WU: I was just going to make the motion that we submit this.

CHAIR KEISER: There is a motion. Is there a second?

MS. HONG: I'm sorry to submit this report?

VICE CHAIR WU: Sorry, I'll make it a little more formal. I move that we take this paper and send it to the secretary as a NACIQI proposal.
MS. HONG: We can do that. It may be redundant. Every year, I report out to the secretary and Congress regarding this committee's activities. She will get this, but you want it on a separate rail, flag it for her to her attention?

VICE CHAIR WU: Right. Just something that says NACIQI voted. This passed. We'd like to show it to you.

CHAIR KEISER: Is there a second? I need a second before we continue. Is there a second, Kathleen?

MS. ALIOTO: Well --

CHAIR KEISER: Before we discuss it, I need a second.

MS. ALIOTO: We can't discuss it without a second?

PARTICIPANT: Yes, right.

MS. ALIOTO: All right, I'll second it so I can talk. Can it include what Claude just suggested that he would do, one pager of best -- what did you say you would do?
MR. PRESSNELL: I don't know what I -- that we would explore -- I think just trying to visit with those accreditors that have dealt with conversion issues and to see if we can uncover some best practices related to that. I think it's a separate issue from the report, so I don't think it's necessary -- it doesn't necessarily need to amend Frank's motion, necessarily.

MS. ALIOTO: Unless he wants to. Frank.

VICE CHAIR WU: I don't have a strong view. I'm just trying to move it along. If people aren't -- I thought people were enthusiastic about this, but if people aren't enthusiastic about sending it on, that's fine with me, too, or if it's just in a bundle of things.

The reason I made the motion is so this stands out, so it isn't just in a big bundle of other stuff that gets reported and may or may not be noticed. It's sort of highlighting it and saying we did something. We want to tell you about it. Here it is. We think this is a good idea
because nobody has said it's a bad idea. We all seem to agree, so it's good to point that out.

CHAIR KEISER: Jen, and then Jill.

MS. HONG: If I make a suggestion, I don't want to understate the communication that does go up to the secretary and to Diane, the senior department official. For example, the annual report is due at the end of every fiscal year, which is September 30th. This report will get sent up to the secretary, along with all the activities for this past fiscal year, to the congressional committees, as well.

CHAIR KEISER: Which has been limited.

MS. HONG: Right. I understand your point, but there has been a lot of attention regarding this particular issue, regarding conversion. Certainly, folks are watching and they're interested and engaged in what NACIQI's discussion is about.

CHAIR KEISER: Jill.

MS. DERBY: I was going to tell Frank that I am enthusiastic. I wonder if it doesn't
MS. HONG: I guess what I'm trying to say is I don't know how much more value or attention it will get sending it up bracketed. We can send up the report and bracket it when we send up the bundle. I think that might be more --

CHAIR KEISER: I think the amendment still is there that we submit it. How it gets there, we'll let staff deal with that, make a recommendation. I think your amendment's still there, and Kathleen's second still stands, unless you want to withdraw it, which would kill the motion. Any further discussion on the motion? Sensing none, all in favor of the motion raise your hands, please.

(Show of hands.)

CHAIR KEISER: All those opposed.

(Show of hands.)

CHAIR KEISER: One? Okay, thank you.

Again, committee, thank you very much for the work
you did.

MR. BOEHME: Should I make a motion about the best practices?

MR. PRESSNELL: I think it's going to be done.

MR. BOEHME: It's going to be done? It doesn't require a motion? Okay.

CHAIR KEISER: Okay, Claude.

MR. PRESSNELL: Just one last -- I wanted to respond to Anne. I know, having been a commissioner with SACSCOC, that their annual meeting is nothing but best practices. It's incredible how many hundreds of people are there going to breakout sessions on particular issues, sharing best practices. I will let you know that I know, at least at that region, it's done pretty extensively. That December meeting is a very long meeting and very engaged. I just wanted to make sure you knew that.

CHAIR KEISER: Okay, not hearing any more discussion, I would entertain a motion to adjourn until tomorrow morning, at 8:30.
MS. DERBY: So moved.

CHAIR KEISER: You don't need to second that one. Thank you, everyone. It was a very good meeting today.

(Whereupon, the above-entitled matter went off the record at 2:47 p.m.)