Candace Evans: Good morning. And thank you for joining us for this week's July NACIQI meeting. Before we begin, please ensure you have opened the WebEx Chat panel by using the associated icon located at the bottom of right corner of your screen. To increase the size of any document that is shared, you move your mouse to the middle left of your screen and click on the magnifying glass in the menu that appears. For optimal viewing, we recommend using grid view. You may select the layout button at the top right of your screen and select grid view from there. When there's a presentation on the screen, we recommend using side by side view.

All attendee lines will be muted until we move to public comments. For agency staff, during your time on the agenda, you will be moved to the panel at which time you may share your video, if you would like to do so. You will also be able to mute and unmute your line at will, please make sure you remain muted until you are ready to speak. If you require assistance at any time during this week's meeting, please send a private chat to the event producer. With that, I will turn the conference over to George Alan Smith. Please go ahead.

George Alan Smith: Thank you, Candace. Good morning and welcome everyone. This is the meeting of the National Advisory Committee on the Institutional Quality and Integrity, also known as NACIQI. My name is George Alan Smith and I'm the Executive Director and Designated Federal Official of NACIQI. As many of you know, NACIQI was established by section 114 of the Higher Education Act of 1965 as amended. And is also governed by provisions of the Federal Advisory Committee Act as amended, which sets forth the formation and use of advisory committees. Sections 101c and 487c-4 of the HEA and section 86C of the Public Health Service Act 42 USC section 2966 require the secretary to publish lists of state approval agencies, nationally recognized accrediting agencies, and state approval and accrediting agencies for programs of nurse education that the secretary determines to be reliable authorities as to the quality of education provided by the institutions and programs they accredit.

Eligibility of educational institutions and programs for participating in various federal programs requires accreditation by an agency listed by the secretary as provided in HEA section 114, NACIQI advises the secretary and 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 program authorized under title four of HEA. In addition to these charges, NACIQI authorizes academic graduate degrees from federal agencies and institutions. This authorization was provided by letter from the Office of Management and Budget in 1954. And this letter is available on the NACIQI website, along with all other records related to NACIQI's deliberations. And so with that, I will turn the meeting over to our Chairperson Art Keiser. Again, thank you for joining us today. Art?

Arthur Keiser:	Well, good morning, everyone. Welcome to our summer meeting. My name is Art Keiser. I am honored to be Chairman of the National Advisory Committee on Institutional Quality and Integrity. We do have a quorum and therefore we can call the meeting to order. At this point, I'd like to introduce and have the members of the committee introduce themselves. And then following that we'll have George and Herman introduce their staffs in that order. I'd like to start with Dr. Kathleen Sullivan Alioto, if you would introduce yourself.
Kathleen Alioto:	Morning? I am Kathleen Sullivan Alioto. A fundraiser and advocate for community colleges, early childhood education, and the empower of a quality education to transform American lives.
Arthur Keiser:	Thank you. Roslyn Clark Artis.
Roslyn Clark Artis:	Good morning colleagues. Roslyn Clark Artis, President of Benedict College in Columbia, South Carolina. One of our nation's historically black colleges and universities.
Arthur Keiser:	Jennifer Blum?
Jennifer Blum:	Good morning. I'm Jennifer Bloom. I'm a higher education policy advisor and lawyer and I'm happy to see you all today and happy to participate. I look forward to it.
Arthur Keiser:	Ronnie Booth?
Ronnie Booth:	Ronnie Booth, President Emeritus, Tri-County Technical College in South Carolina. Glad to be here.
Arthur Keiser:	Wally Boston?
Wallace Boston:	Wally Boston, President Emeritus of American Public University System. Glad to be here.
Arthur Keiser:	Jill Derby.
Jill Derby:	Good morning. Jill Derby, I am a senior fellow with the association of governing boards of universities and colleges.
Arthur Keiser:	David Eubanks?
David Eubanks:	Morning, everyone. I'm David Eubanks at Furman University in South Carolina, where I supervise institutional research assessment and [inaudible 00:05:20].
Arthur Keiser:	And I want to welcome officially our newest member, our student member, Molly Hall-Martin.

Molly Hall-Martin:	Good morning, everybody. I'm Molly Hall-Martin. I'm a doctoral student in Higher Education and Student Affairs program at the University of Iowa.
Arthur Keiser:	Paul LeBlanc? I don't see Paul. Michael Lindsay. I don't see Michael. Robert Mayes.
Robert Mayes:	Good morning and it is Robert Mayes. I'm with Columbia's Southern Meditation group or institutions or Columbia Southern University in South Alabama and Waldorf University in Iowa.
Arthur Keiser:	Mary Ellen Petrisko?
Mary Ellen Petrisko:	I'm Mary Ellen Petrisko. Past President of WASC Senior College and University Commission.
Arthur Keiser:	Claude Pressnell?
Claude Pressnell:	Claude Pressnell, the President of the Tennessee Independent Colleges and Universities Association and vice chair of the committee.
Arthur Keiser:	Robert Shireman.
Robert Shireman:	Good morning. I'm Bob Shireman. I am a senior fellow and director of the higher education program at the Century Foundation.
Arthur Keiser:	And Steven VanAusdle.
Steven VanAusdle:	Steven VanAusdle, President Walla Walla Community College at Washington state.
Arthur Keiser:	And George, would you like to introduce your staff?
George Alan Smith:	Yes. I do have one person who's now supporting me, it's Monica Freeman would you like to introduce yourself?
Arthur Keiser:	And Herman. You have a much larger staff if you'd like to introduce them.
Herman Bounds:	Thank you all. Good morning, everyone. I'd like to introduce Accreditation Group that we have with us today. Reha Mallory, Nicole Harris, Stephanie McKissic, Charity Helton, Karmon Simms-Coates and Michael Stein. My side, we also have Jazz Holt, A. Walker. We have two new hires that are not active, but they will be next week and the week after, LG Corder and Paul Floyd. And again my name's Herman Bounds, I'm director of the Accreditation Group. That's it for me you all.
Arthur Keiser:	Thank you, Herman. And it's my pleasure to now give us an administrative policy update by Julie Margetta Morgan, the Acting Undersecretary and Senior Advisor

to the Office of the Undersecretary. Julie Marqetta Morgan, most recently served on the Biden-Harris transition as a member of the COVID-19 response team. Prior to joining the transition, she served in a variety of economic and domestic policy roles, including Vice-President of Research at the Roosevelt Institute, Senior Domestic Policy Advisor for Warren for President, and Co-Founder and Executive Director of the Great Democracy Initiative. She has more than a decade of experience in student loan oversight, regulation and policy development, including serving as senior education counsel to Senator Elizabeth Warren. Please welcome with me, Acting Undersecretary and Senior Advisor, Julie Margetta Morgan.

Julie Morgan: Thank you so much for that kind introduction. I'm hoping that you all can hear me. So just anyone, if you can give a nod. Okay, cool. I'm using multiple technologies here to make sure I'm heard. Great. So, it's great to see you all again, and I appreciate you allowing me a few moments to address you directly. I know this isn't the primary business of the meeting, but I'd like to just say a few words here. I just want to welcome all of the continuing members and thank you for all the hard work you've done to prepare for this NACIQI meeting. And I'd also like to extend a big welcome to the newest member of the committee, Molly Hall-Martin, who has served in the student role.

Molly has a PhD in Higher Education and Student Affairs program at the University of Iowa. She's formerly served as a Director of Student Preparation and Success for the South Dakota Board of Regents and as an intern at the Institute for Higher Education Policy and the State Higher Education Executive Officers Association. Her research focuses on an impact of higher education policy particularly, as it pertains to indigenous students. And she also studies the policy and politics surrounding confucius institutes, higher education governance, governing boards, and state agencies. Molly holds a Bachelor's degree in American-Indian studies from the University of North Carolina and a Master's degree in Adult and Higher Education from the University of Oklahoma. So very impressive resume. And we're excited to have you here with us today, so welcome Molly.

NACIQI members are not the only ones who have to put in hard work to prepare for this event. So to that end, I'd also like to thank George Smith, the Executive Director for NACIQI and Monica Freeman who put together this great meeting. Herman Bounds, the Director of Accreditation and his entire team of analysts, who reviewed the lengthy agency petitions and supporting evidence and exhibits. And Donna Mangold and Angela Sierra and the Department's Office of General Counsel. I'd also like to begin by providing some policy updates from the administration, and then address a few new items on the agenda for this meeting and forthcoming work of the department.

Last week marked six months into the Biden-Harris administration. And we've been hard at work to help America build back better by addressing crises facing our nation, including both students and institutions of higher education. Right now, we're working to recover from the pandemic and reopen campuses. Many

people are eager to get back to normal, but a lot has changed over the last year for our students, faculty, staff, and campus communities. As students head back to campus and accreditors begin resuming onsite visits, I hope that you'll help us reimagine what the future should be for our students, and for the staff who've lagged or offended over the last year. Throughout the pandemic, we've realized the many barriers that can stand in the way of student success and completion. We need a higher education system that's responsive to student needs and realities, and helps them pursue a degree or credential that is affordable, high quality, and that will have real value in the workforce.

And as you know, education is a foundational priority of President Biden's agenda. We're committed to building back better for all Americans. And today I want to share five core values of the Biden-Harris administration's education agenda that I think are really essential to the work that you all work here today. The first is recovery. The Biden-Harris administration is committed to recovery. President Biden signed the American rescue plan. One of the largest single investments ever made in institutional and student grants into our nation's most under-resourced institutions. These funds are designed to help higher education emerged from the pandemic stronger than we went in. And it's important to say that we shouldn't just be striving to make things the way they used to be, after all things weren't universally great before the pandemic, we all know that for decades, there have been disparate outcomes that make it abundantly clear that our higher education system works well for some and doesn't work at all for others.

We've seen institutions use funds in the American rescue plan to show their commitment to a student focus recovery, including closing equity gaps by using their own funds to provide more emergency grants for students, investing in student support services and mental health counseling, and taking steps to mitigate the spread of Coronavirus. More colleges are also rethinking how the use of enrollment in transcript withholding drives inequity among the most vulnerable students. And they're using their own ARP funds to discharge unpaid student balances so that students can re-enroll, continue their education, or obtain their official transcripts to transfer or secure employment, or they're ending the practice of transcripts withholding altogether. Emerging stronger from the pandemic means that we don't have to carry bad or outdated practices and ideologies into our future. And that will all work together to eliminate barriers holding students back.

The second core value is all about affordability. College affordability is a systemic problem that must be addressed comprehensively. That's why President Biden has announced support for a groundbreaking free community college program and plans to subsidize tuition for low and middle income families at HBCU and minority serving institutions. President Biden is also working toward doubling the Pell grant. For students from low income and working class families, these grants are lifelines. But the program has failed to keep up with the rising cost of college. We're also working to revamp our policies and take new actions with student loans. This administration has

already provided substantial relief to borrowers and we will work to provide even more support in the coming weeks and months. This brings me to the third core feature, outcomes.

The Biden-Harris administration wants to see improvements in student outcomes. President Biden hopes to create a bold, new grant program to assist colleges, particularly, those serving the largest numbers of low-income students in implementing evidence-based practices and solutions that increase student retention and graduation. The department is also working to protect students from harmful programs and predatory practices that can derail their post-secondary careers and create unnecessary barriers. It is our commitment to ensure that we are serving students empower as well.

Four, the Biden-Harris administration is focused on equity. We are unapologetically committed to equity. President Biden has signed an executive order pledging to focus on advancing racial equity through systemic and policy change. And we're working every day to carry out this commitment. Higher education requires that we uplift diversity, equity, and inclusion within all facets of our educational system. This means that we identify and address underlying systemic barriers, those policies and practices that are drivers of inequitable outcomes and have created a system of haves and have not, not only on our campuses, but also in our workforce in broader society. As we look to fully reopen and to shift back into in-person learning, focusing on equity requires that we take real responsibility for assuring quality and that we use and analyze data ensuring that our most vulnerable students are not left behind.

And the last core feature I want to mention is value. Getting students to and through college and into the workforce and into quality degrees and credentials is of paramount importance. This is an important milestone for students and their families, but it's also essential for our country's economic and global competitiveness. Making a college dream a reality is a strong step toward economic stability for all of us. This is not easy work, and it will likely require us to question every aspect of our work, including quality assurance. Giving your commitment to quality and integrity as members of this committee, you hold enormous potential to make the system work better for students. To that end, I'd like to make sure that you know, that if members of this advisory committee, this work includes each of you and aligning to these goals is a critical component of the accreditation process.

NACIQI advises the Secretary of Education, not just on the individual recognition process of specific accrediting agencies, associations, or state approval agencies, but also on the establishment and enforcement of criteria for recognition, eligibility, and certification processes for institutions of higher education, and other issues relating to accreditation and institutional eligibility. Throughout its tenure, NACIQI has engaged in extensive efforts to connect with the accreditation and higher education communities, researchers, and policymakers, and interested members of the public to develop recommendations for Congress and propose new ideas to the department. And

over the years, it has asked important questions about student outcomes and success that has encouraged and challenged accrediting agencies and the department to broaden their vision of success. We know that a subcommittee of members that has been hard at work engaging on issues of student success and we look forward to hearing more about that important work this week.

To further encourage these conversations, we have ensured that there'll be time at the end of the meeting for public discussion of policy. And we encourage you to use that time for areas of interest to the committee, like the subcommittee on student success. This meaning, we have already reintroduced the accreditor dashboards and accompany in data file, which the committee asked the department to consider producing during its last meeting. The accreditor dashboard first introduced in 2016 as part of a pilot project by the committee helped raise some of the issues that are of core importance to the administration, including student outcomes, equity, and value. This is one important step to a greater transparency, and we hope you find these a value in your discussion. We have also prepared a presentation to review the dashboard and welcome any questions or comments that we may use to refine them over time.

Last meeting, the committee also asked the department to assess options for making more documents available to this public earlier in the recognition process. We're exploring that question and engaging conversation across the department and we look forward to being able to share more with you in the months ahead. Finally, the department is working on forthcoming guidance to help review the requirements and regulations governing both federal student aid and accreditation, particularly, in light of recent changes to a number of those rules. We will help to identify where the regulations may overlap or create confusion and to remind institutions and accreditors of their obligations. We look forward to sharing that with you soon. Please know that the administration appreciates your dedication and hard work, and we look forward to working with you on these critical issues. Thanks.

Candace Evans:	Art, your line is muted.
Arthur Keiser:	Again, thank you Dr. Morgan. It was a pleasure to have you with us. It's also a pleasure to see that the department listened to what our suggestion was, I think that's pretty exciting. I do want to introduce a new member, not a member, but a member just joined us. Paul, could you introduce yourself?
Paul LeBlanc:	Hi, I'm sorry am late. I'm Paul LeBlanc. President Southern New Hampshire University.
Arthur Keiser:	Thank you very much. We're going to move into the first order of agenda, which is following what we just heard that the committee did request that we bring back the accreditor dashboards. In order to do that, we have Brian Fu who will be the Program Director and Management Analyst at the Office of Planning,

Evaluation, and Policy Development. Brian, I hope you are ready. I don't see you on, but there you are. Good. Brian, you're up.

Brian Fu: Good morning, everybody. My name is Brian. It's great to be with you guys this morning. I'm actually going to walk you through step by step, kind of the nuts and bolts of the dashboards. But before I share my screen, maybe I can share some broad overview items, specifically, kind of what the purpose is and where the data come from. So, the purpose of the dashboards is really to provide a summary of the distribution of institutional characteristics and institutional data outcomes per accrediting agency. And in addition to that summary, there are resources available to look at, more granular data at the institution level. Say, you kind of have the summary and the more granular information.

The data generating process? So where do these data come from? The data actually come from all publicly available sources, primarily the college scorecard and the federal student aid or FSA data center. So if there's anything that you're particularly curious about others in the public can go out and have different derivations of these visualizations. One of the key things to know about how we calculate data for particular institutions is that the unit of analysis, sort of the entity of how we define institutions in this dashboard is that the main campus, O P E I D six level. So, to the extent that a lot of these data come from sort of more granular data sources, for example, iPads, that has sort of smaller branch campuses, we aggregate all of those numbers up to the six digit OPEID level.

Another important part of this because we're focusing on accrediting agencies, but I might tell you a little bit about the data generating process for how we link schools within accredited agencies. This is derived from college scorecard. A college scorecard derives this information from PEPS, P E P S that's the Federal Student Aid System, and that all institutions that participate in title four need to report to. And one of the data fields that they report is the accrediting agency and specifically, a primary accreditor, so that is how we are linking specific institutions to specific accrediting agencies. A couple of key caveats also about the data, we've only included title four participating institution. So while a lot of these accrediting agencies may work with institutions or entities outside of that space, we're just kind of focusing on the title four institutions in part because that's where we have most data.

Another key caveat is that some of the metrics focus only on title four students. We have a mix of the developments, but there are for example, in regards to debt, any debt metrics that you'll see relate only to federal loans, that's kind of where we have the data and we don't have information by way of private loans outside of that. And I'll kind of note where we have information beyond title four students, but just something to be aware of as a caveat.

The last caveat that I want to mention is there are institutions that don't have data for all of the data elements so there might be different reasons for that. One of the reasons is that institutions are not required to report on some particular data elements, for example, in IPEDs, there are different categories of

institutions that report differently on different data elements. And the second piece is privacy suppression. So you'll see that for a lot of institutions, there'll be missing data just because of disclosure risks, what we do to suppress certain data sets. So we report all the data that we have available for the institutions associated with the accredited agencies, and I think that's kind of it for the caveats. I'm going to go ahead and try to share my screen here.

Okay. I see your video. Can you give me a thumbs up or nod if you can actually see. Fine, okay, thank you. So I'm going to walk through the PDF file, which kind of is the key summary document. And I think it'll give you enough information to go through the more detailed information at a later time. I think this is a good overview. So you'll see at the first page or the cover page and a table of contents, though it is quite a bit of, like the introduction. Page four provides a kind of a cheat sheet on the key data elements. I'm not going to go through those in this table because I think it's easier to kind of describe those as we visualize the data, but just wanted to let you know that's a good reference point for you. Some of the data notes that I mentioned before are available on page five. And the read me text really gets you some very granular information on where the data come from and how they're calculated.

So I just wanted to point out that you will get the most granular type of descriptions started on page six, going all the way down to page nine. With that, I will walk through one of these dashboards, I guess you could call this. So these dashboards that are related to each accrediting agency, but there's also sort of some summary ones. This is a summary one that describes all of the institutions that are sort of in the universe of our analysis. And I'll just kind of go, I guess, left to right up to down and briefly describe what we're seeing here. And that's upper left-hand corner, you'll see the number of institutions again, as I mentioned before, that's related to the six digit OPEID as the unit of analysis, and this kind of represents everything in that universe. In terms of locations, that's where if you are familiar with IPEDs and the more granular data, and the branch campuses, that's the number of locations sort of within those main campus locations. So just note that there's a many to one relationship you can kind of see later on how many campuses are being recorded on.

Heighten cash monitoring, this a seven so that's kind of the department's way of evaluating risk. There are two types of heightened cash monitoring flags that the department uses. It's all available on the federal student aid website. There's sort of heightened cash monitoring one, which is less serious categorization and heightened cash monitoring two. This particular metric grabs the two, the more serious version of heightened cash monitoring. We can kind of stay with this upper left hand corner we have the number of graduates that refers to Fall Enrollment of undergraduates, and then the title for volume records. Obviously, those are the grants and loans that are associated with this set of institutions. And the set of institutions includes everything in the universe that I described that we're capturing, which is title four institutions that are currently operating.

So more contextual information about the set of institutions, and the set of institutions will be more meaningful as you look at particular smaller groups of institutions, but this is sort of at the national level also. The proportion of undergraduates that are participating in title four, whether it be borrowers or grant recipients. If we move over to the right hand upper corner, we get a sense of essentially, sector, I guess we could call it, which is the control public nonprofit for profits and also the level. This is a little bit different. This is direct from college scorecard and may be different than how you think about sector in other contexts. For example, an IPED sector is based on the highest level, whereas this level, whether is based on the crime rate undergraduate or war type. So, it's, if institution primarily award certificates, for example, if it was 90 percent of its awards or certificates, we would categorize that as a certificate granting institution, even though it may offer one or two bachelor's degrees, associates degrees or higher. So it's based on the predominant undergraduate award type.

So this upper section really describes the institutional characteristics. What types of institutions and what types of students do they serve? If we go down to these color coded metrics here, we begin to look at, I guess, more outcome type of metrics. And we have buckets, each number represents the number of institutions, the number of main campus OPEID six institutions in each category. And the categories are sort of the span of percentages here. So for example, red is zero to 31 percent. Yellow is 31 percent to 48 percent. So why did we choose zero to 31 percent? Why not 20 percent, 40 percent? Since these are based on the national Quintiles, essentially. So we try to find numbers here so that we can have as even buckets as we can on the national. So when you look at particular, I'll just kind of scroll down to some of these later. When you look at particular accredited agencies, you'll be able to see how many fit into each category is that sort of the national distribution of each particular file.

One thing that I'll note what you are comparing, to the extent that a lot of institutions may vary particular like graduation rates, then they vary by the type of institution it is. We've taken if you look at pages 11, I believe 12, and 13, you'll see the title is different. It's now predominantly bachelor's degree granting institutions. You can kind of see that this is kind of maybe the typical distribution for those types of institutions. And that's important because then you have the context. For example, if you kind of look at graduation rates for all currently operating institutions you're kind of mixing together institutions, for example, that maybe just have three month programs, four month programs you may expect to have higher graduation rates than those of primarily bachelors school. So to give you kind of that context is provided, the next three dashboards are by predominant award type. This graduation rate comes from IPED, so it includes both title four students and non-title four students. And it represents 150 percent graduate, excuse me, graduation within 150 percent of normal time for first time, full time students only. The next is graduation plus transfer rate.

Brian Fu:	The next is graduation plus transfer rate. And this is important because a lot of institutions, they have a mission to not only graduate students, but also to transfer students. For example, in articulation agreements. This is reported for only degree-granting institutions so you may see that the total number of institutions reported here is smaller than overall graduation rates. The next item here is the proportion of students that are earning, excuse me, the proportion of completers, students who complete, that earn above 150% of poverty level for the third year after leaving and completing at the institution.
	I'm going to move now to the right and talk, actually let's keep going down and look at loan performance. Loan performance, we have the number of institutions within these percentage bands for cohort default rate. I think everybody is familiar with the cohort default rate metric. So I'll move on to dollar based repayment rate. Dollar based repayment rate is a different kind of way to look at a student or borrower non-performance, repayment performance. And it's basically a numerator and denominator. The numerator represents the balance four years after entering the repayment. The denominator is the amount that was dispersed in loans. So, it represents the entire portfolio of a cohort of students. We take a cohort of students that went into repayment. We measure how many loans they received. Just the amount of dispersed, no interest. Four years later, we measure the sum of the outstanding balance of all of those students and those out of all those borrowers. And that represents the dollar based repayment rate to the extent that you see numbers over a hundred percent. That represents that interest has accrued faster than sort of principal has been paid down.
	So you'll see dollar based repayment rates for three different types of portfolios. The first is the undergraduate loans. The second is the graduate loans. So graduate loans in this context includes both the Stafford and the graduate plus loans. And lastly the parent plus loans, which is it's an undergraduate only loan program.
	Although, look to this upper right middle section, which is debt and net price. The first item here is the schools by. This is the median debt of completers. So we take again, an exit cohort, the number of students that are leaving the institution and we look at only the completers and we take a median of the amount of undergraduate debt. So this is only an undergraduate metric. And again, we do the number of institutions by percentage band. We do this both for median debt to the students and also to the parents here.
	If we look at these two, you'll see that it's a little bit of a different pattern. We just have the counts and not the quintiles. So average net prices, the average net price is the average amount paid. This is tuition fees, living costs minus any grants and scholarships. We do this. We don't do the national quintiles because it's a pretty drastic difference in the way that different institutions actually calculate this. For example, and this is also from IPEDS and for example, program reporters only report the largest program, whereas other academic institutions will report for the entire institution.

So just a few frequency counts in sort of even buckets of under 10,000, between 10 and 20, 20 and 30. Lastly, this middle section is title four volume, and we have also just frequency counts here because the quintiles are kind of skewed. That kind of gives you a summary of all the data elements on sort of one dashboard. And all the dashboards are consistently in this format. As I mentioned before, we have groups of institutions. This is the group of institutions of all of the institutions that we evaluated. The next three represented groups of institutions based on the predominant undergraduate award type. So institutions that predominantly award bachelor's degrees, associate's degrees and undergraduate certificates. We have those groups and you can use those for reference. Often times it might be helpful to do side by side if you, I don't know if you have a printer, if you're evaluating an accrediting agency that primarily accredits certificate granting institutions. This might be a helpful tool.

And after that, we kind of go accrediting agency by accrediting agency. So this is, I believe in alphabetical order. And you can look at each of the accrediting agencies and compare them. One other thing I'll note is that on this page we do have some more granular information. This starts on page 14, I believe. Of the larger institutions for each of the accrediting agencies, if you want it to look or more granular information within this document, if you want to look for more granular information on any particular institution, that's really what the Microsoft XML file is for. I might have to leave it there as Dr. Morgan mentioned earlier, this is definitely to help you guys out so if there's different ways that we can use this in the future, we'd love to hear your feedback. Love to get any questions to the extent if you have questions on this as well.

Arthur Keiser:	Brian, we have a question from Wally Boston.
Brian Fu:	Okay.
Wallace Boston:	You know, great review. A question that I have is recently I became aware that the College Scorecard is now collecting program data for graduate programs, even though they're not publishing that data on scorecard itself. There was a Wall Street Journal article that developed the tool to use the data that showed the return or lack of return. Since we have a number of accrediting bodies that we approve that our accrediting bodies for graduate programs only. Now that the scorecard is collecting this data, is it possible that we could get graduate programs in, for example, the ABA which is one of our institutions on its website says that they accredited 199 institutions or law schools. And when you go to their score card at 16 only, and doesn't really represent the data that was in the most recent data dump by the score of College Scorecard.
Brian Fu:	Sure. I can talk a little bit about the College Scorecard. So it's not the easiest thing to find because the College Scorecard consumer site is primarily targeted to our undergraduate population prospective students, but you will be able to find both in the College Scorecard, consumer site and the downloadable the files, the program level data related to graduate programs specifically. In terms

of incorporating it into the dashboard, I think that makes sense. There is a lot of variation across programs, particularly in the graduate space. If you have any suggestions on how to do that, we could do like average of mediums or median of mediums. Is there a particular methodology that you would suggest?

Wallace Boston: I'm glad to think about that. I just felt that given this recent show that the data was there, it's quite eye opening in many cases. Particularly the way the Journal displayed the ratio of median debt to median earnings and many programs were over 1.0. I think it's very interesting. We look at some of the professional accrediting bodies and their pass rates on professional exams, but now that we also have debt and ratios of debt to earnings, I think that's important. It'd be nice to see some of that on the dashboards.

Brian Fu: Great feedback. We'll examine and it sounds like what you're most interested in is perhaps ratios. So we'll find ways to what we'll kind of think about how to present that.

Wallace Boston: Thank you.

Arthur Keiser: The next question's by Kathleen. I assume you've muted. There you go. Hit play.

Kathleen Alioto: I found this so helpful in I'm working at an HCSC and thank you so much for putting it together for us because it's a life changer, I think, in terms of our being able to actually start accrediting agencies. One of the things that I did in order to be able to compare the various schools, instead of doing one at a time, one at a time, I organized it so that HCSC I got all of the schools that they have, and that it was easier to make an analysis of some of the schools that weren't charging a huge amount of money and so forth. So already you have the data, but if you could organize it for us by accrediting agencies and institutions, it would be helpful so that we don't have to do that.

Brian Fu: Okay. Sure. And then, so you're looking for a filter for that institutional...

Kathleen Alioto: Yeah. I feel too on with a variety of different categories, but all potentially with these debt issues it would be helpful if that were contained and documented. Also, it could be something that students and others could look at to see how some schools just might and others would be more appropriate for them to choose. I also wondered, do you catch any value judgements to any of this?

Brian Fu: I think the purpose of this is to show a summary of the data elements that we have readily available and to provide as many caveats as we can to those data elements. As much context within the data dictionary on the thing. So I think we really, the purpose of this is try to just provide the data for the committee to consider and make those types of interpretations based on context.

Kathleen Alioto: Do you know it's the department introducing it all in terms of its own decision making?

Brian Fu:	Yeah. So I'm part of the office of the chief data office, which is a little bit apart from OP. I might rely on some of my old office of post-secondary education to kind of address that question. Sorry, I don't know. Feel free to step in others and OP, if you want to take that question.
Kathleen Alioto:	Thank you.
Arthur Keiser:	Okay. Thank you. And when you finish your question, please lower your hand by pushing that little button again and signal the questions. We have to third party commenters
Jill Derby:	All right. This is Jill. I put up my hand, but I guess you didn't see it.
Arthur Keiser:	No, Okay. No, Jennifer has one up. Jill, I don't see that. No.
Jill Derby:	Well, I did click on the icon.
Arthur Keiser:	Do you see it on your participant? Kathleen, would you lower you? Okay. I think she did. Okay, Jill. I'll get Jill and then Jennifer, and then we'll go to the third-party commenters.
Jill Derby:	Just a quick comment. And I wanted to support Wally's suggestion about them get to median earnings. I think that would be a very helpful data, but mostly I just want to a commendate Herman and George, all of you for providing this. I don't know how many of us were on the NACIQI in 2016 when we initially requested this sort of dashboard information, but this is light years ahead of what we had available in the early years of this effort. And it's really terrific. It's going to be very helpful to us. Thank you.
Arthur Keiser:	Okay. Jennifer? Jennifer Blum?
Jennifer Blum:	Sorry. Hi, Brian. It's good to see you again. And I won't take too much time. I don't know if there's, I mean, I guess what I would say is I hope there's multiple opportunities for follow-up as appropriate for those of us who have dug in as you know, I just dug into the data for years. I have lots of comments, which I won't take time up on today. My primary comment, and then I do have questions is I think this is great. And I certainly am very supportive. On the other hand, or maybe it's not on the other hand, it's just an in addition comments, we all kind of know that the scorecard while at the best effort on the part of the department is pretty flawed. Wally brought up some of that already by pointing out the grad program issue.
	There are a number, in addition to sort of on the accreditation side, there are a number of institutions that predominantly graduate level or have a mix that doesn't get fully represented in the scorecard. And then therefore doesn't get fully represented from an accreditation standpoint in the dashboard. It's sort of a precipitation or an exacerbation of data system problems and data problems.

So my question is I could go into lots of weeds and I don't think that's productive today necessarily, but I have two questions. One is, does the department, I haven't really seen much as a priority in terms of everything that the department has been saying about what it plans to do in terms of both itself and recommendations to Congress on improving data on getting beyond first-time full-time on.

And I know we do to some degree get beyond that already, but improving first time full-time and graduation rates, the fact that many institutions are actually making efforts to not rely entirely on Title Four loans for their students. And yet those schools aren't reflected in the data. The list sort of goes on and on. What is the department, and again, this might be a policy related question, but you are a primary data person. Are there efforts to try to improve the data or to make recommendations on how to improve data, maybe another TRP or something like that?

Brian Fu: Yeah, I think, I mean, from the perspective of the department, I think we're always trying to improve data. From my perspective, trying to leverage the data that we have to the extent as much as we can. The IPEDS is where a lot of this data is coming is having technical review panels, I think. Multiple ones each year, for example. So those are always ways. There's a process I believe for public comment there as well. So there's, there's always opportunities within that. We can consider it. I can give you were part of the initial or what are the initial scorecard TRPs and would love to get your feedback whether we do that forum or another forum, if you have some feedback. And I think from a policy perspective, we're always, I think, interested in improving data. Whether it's through discussions with Congress or just more TRPs or every data collection instrument that we put out there goes for 60 day comment and 30 day comment.

So those are all, I think, systems that can accommodate that sort of public feedback. But I don't know if that helps answer your question.

Jennifer Blum: A little bit. I guess I would just urge that. Two other quick questions. One is, or maybe one's comment again, and a recommendation. To be completely honest, without having a lot of the caveats and disclaimers that you provided us today, and I know that are in the longer document that you sort of provide the disclaimers in the caveat, but for the dashboard itself, without having those on the pages, honestly, if a school put up a dashboard like this, there would be allegations of that they were misleading. So for example, the graduation and earnings, the loan repayment rates, I mean, because of the data issues that exist for the department, I really would urge the dashboard say right up front that the graduation is based on first time full-time and an undergrad only. I know it's in the 56 page document that we all know how the public doesn't have the time to look through 56 pages.

So I would urge for disclosures in a size font that is readable as the same way the department requires that of the institutions. I would really recommend full

transparency on the dashboard. I know that there's space issues, but if it means that the dashboards themselves up being five pages instead of four or something like that, it just needs to be very visible what the data is based on. It just appropriate and fair for both the accrediting agencies and the schools that are under the underlying data. So, that's just a comment. And then my final question, which is also very related to this, we all know that the data in the next couple of years is going to be incredibly frankly, screwed up. I could use a four letter fail, curse word to describe how the data is going to be in the next few years because of the pandemic, particularly relating to loan repayment rates. What is the department's plan on how to handle again so that everybody understands how screwed up the data is going to be?

I mean, I think it's great that we re-institute the dashboard at the same time, the scorecard and dashboard are going to go through a lot of bumps in the road in the last couple of years of the department have a plan for handling that?

Brian Fu: You know, in terms of presentation I don't know if we have specific plans for each of the different products on how we're using it, but I can say that we do plan on reproducing the data for each year with very similar or the same methodologies. If you have suggestions for how we would do that for this particular product, that would be helpful.

Jennifer Blum: I would suggest, I mean, I'll tell you right now, I would suggest a very immediate technical review panel to figure that out because we all know that there's not going to be a default rate because, you know, obviously there's no repayment right now. Everybody's going to be zero, but everybody's going to have a perfect default rate, which of course is not true at all. So I would urge a technical review panel of people who understands. People who really have been in the weeds on data for a long time to help the department figure out how to do this accurately, how not to have it misrepresents the realities We just need to be truthful and honest to all of our communities for the next few years, because it's going to be very difficult.

We're not going to really know honestly, a lot about how schools. I mean, it's going to be hard. And so I think I really urge for us to all work collaboratively together, to figure out how to at the same time, be as transparent as possible about those realities.

Brian Fu: Thanks for that feedback. That's really helpful.

Arthur Keiser: Thank you, Jennifer. If you'd bring your hand down, we do have two third-party commenters. I do want to discuss the way the third party commenters work. You have three minutes to make your presentation. I will time it, and I don't know if you can see me, but I'm going to put my finger up when we get to one minute and that way you'll know to be finished. And I'll try to keep you apprised of where we are. First third party commenter is Miss Alejandra Acosta from New America. Alejandra?

Alejandra Acosta:	Hola. Can you all hear me and see me?
Arthur Keiser:	We can hear you and see you.
Alejandra Acosta:	Wonderful. And I still see Brian who's a screen pulled up, so I don't know if he would like to bring that down or not, but just notifying you all. I'll start my comment now. Hello everyone. Good morning. My name is Alejandra Acosta. I'm a policy analyst with New America. Thank you so much for the opportunity to comment today. I want to commend the department for reinstating different dashboards to use NACIQI during this recommendation process. NACIQI plays a hugely important goal in the upcoming recognition process. As a federally appointed committee that review and recommend the coding agencies for recognition by the department, its advice can lead to accreditors, gaining or losing the power to determine which colleges maintain a standard of quality that gives them access to taxpayer funded, federal financial aid dollars. Despite the huge implications for safety decisions, quantitative data was not an integral part of NACIQI, excuse me, NACIQI's job for many years. Instead, NACIQI traditionally used narrative self-assessments written by the accreditor and an ed review team to aid in the review.

Without the cold hard data in the dashboards, NACIQI was partially blind to whether computers were doing their job as seat keepers of federal dollars and stewards of quality. The reinstatement of the accreditor dashboards is a positive change for the…., the accreditation process, and for students and taxpayers. Having the dashboards and agency narratives will provide the committee with a fuller picture of how well accreditors are doing their jobs. Specifically NACIQI will be able to see if colleges under an accreditor are graduating, their students, preparing them for the workforce and equipping them to pay back their loans. These points are essential to NACIQI's job and the integrity of our higher education system. I also want to commend the department for including data on undergraduates of color. Racial equity jobs and higher education continue to persist and have worsened due to the pandemic and accompanying recession.

This data will help NACIQI accreditors and colleges have a clear look at how well they are serving the country's more vulnerable students and make changes so that all students can benefit from the opportunity of higher education. The inclusion of this data point highlights the department's commitment to equity, specifically racial equity, and is a step in the right direction. Again, the department did the right thing by reinstating the accreditor dashboards and making quantitative data an integral part of the NACIQI accredited review process. Thank you for the opportunity to comment. I would now like to pass this onto my colleague, Amy Laitinen, to talk about how to further strengthen the accreditation and accredited recognition processes. Thank you. |
| Arthur Keiser: | The second presenter is Ms. Amy Laitinen at the New American Foundation, and she also has three minutes to make her presentation. |
| Amy Laitinen: | Hello, can you hear me? |

Arthur Keiser:	Yes.
Amy Laitinen:	Wonderful. Good morning. Thanks for taking the time for public comment this morning. I want to echo the comments of my colleague Alejandra Acosta and thank you for reinstating the accreditor dashboards. Now, I also want to echo how important data-driven decisions are in protecting students and taxpayers and ensuring that our higher education system, which is largely enabled by federal dollars is helping and not harming students of color and how important data and public transparency into these decisions are. And we think more this is a great step, but we think more can and should be done to increase transparency into the process, which will enable more meaningful engagement by the public [inaudible 01:01:38]. How first and most important to departments should make more accreditation documents available for the public. And it should make those documents available [inaudible 01:01:47]. NACIQI members can and should consider insights from outside groups and mix reviews. When the right documents are not made available or made available in a timely manner before the meeting, it limits meaningful public engagement.
	And we were really glad to hear Acting Under Secretary Morgan to say that the department is considering this. Second, the secretary is required to make quote "all documents provided to the advisory committee available to the public" unquote. Available to the public does not mean available if someone files away a request. The department of justice says that FOIA backups permit people to quote "make your requests for information that is not yet publicly available" unquote which underscores the FOIA is not publicly available. And also speaking of somebody who has waited for years for FOIA requests to be filed, it's not a very timely way or useful way for those wishing to get public comment or to provide public comment.
	And finally, I'd like to address the placement of public comment on the agenda. Comments are currently scheduled after the committee has begun deliberations on an agency and this sort of treats oral comments and public input as an afterthought to rather than an integral part of the discussion. If the purpose of public comment is to, and I hope it is, to help inform the committee's deliberation, placement of public comments should be moved to the top rather than the bottom of each agenda item. Again, thank you for reinstating the accreditor dashboard and for considering these requests for even greater transparency, to facilitate more meaningful input, as you consider these, as you take on this really important task that you are doing. So thank you so much.
Arthur Keiser:	Thank you, Amy. And again, thank you Brian, for an outstanding presentation. We're now moving to the second report that we have, and this will be our student success subcommittee. And our subcommittee chairman is David Eubanks. Before he gets started, I want to thank him. The work that he did was way above anybody's expectations. We are so appreciative of what you did and thank you. And we look forward to your report. David?

David Eubanks:	Thank you, Mr. Chairman. I appreciate those kinds of remarks, but I think most of the credit belongs to the other members of the subcommittee who are wiser and more perspicacious than I am. And they were incredibly dedicated and engaged throughout our process that involved many hours of reading materials, interviewing and meeting to discuss. And then finally, as we report that's now in your hands. The other subcommittee members are Roslyn Artis, Jennifer Blum, Wally Boston, Jill Derby, Robert Mayes, Mary Ellen Petrisko, and Bob Shireman. So thank you colleagues for a long hard working six months. The following is a summary of a longer report, which was distributed to the NACIQI last week and I assume will be soon if not already on the website. So the summary is at its last edits July 2020 NACIQI created a subcommittee to look at the impact of changes to the 2019 handbook for accreditors related to student achievement standards and the underlying rules adopted November 1st, 2019.
	A revision to the handbook now emphasizes the importance of documentation asking for citation for pages within the agency standards and policy manuals that describe the standards set by the agency for measuring student achievement. These pages must describe the way the agency evaluates adherence to those requirements and the way it enforces compliance. Since the March 2021 NACIQI meeting, the subcommittee has reviewed documents from our prior applications to the department on three institutional accreditors in order to see how agencies carry out this work. We also interviewed four institutional and two programmatic agencies, as well as the leadership from the three learning assessment organizations. At the end of our review, we concluded that accreditors are genuinely interested in the assessment of student learning at a number of institutions. In addition to the student outcomes required by the higher education act and regulations, and that the student learning standards and peer reviews serve to focus institutional efforts on student learning. Years of application of these standards have undoubtedly resulted in more attention being paid to program [inaudible 01:06:36], curricular coherence, and the importance of faculty development in those areas.
	However, although most student learning standards you reviewed are written in general language and would seem to allow for institutional flexibility. It seems that in some cases there are requirements beyond the written standards that are enforced to peer reviews, and that may limit the practical application of standards. The committee saw some evidence confirming interviews, agencies and higher education associations that peer reviews can be too confining and may sometimes inhibit useful innovation by institutions. The subcommittee's findings suggest that creditors and institutions should consider improving student learning assessments so that they, one, are less complicated, expensive, and time-consuming. Two, pay more attention to data quality and quantity and sophistication in analysis. Three, allow more customization to institutional mission and culture. Four, permit innovations and measuring student learning. And five, do not allow peer reviewers to add requirements. Additional detail and appendix including citations from a number of higher education publications are provided in that full report. And at your pleasure, Mr. Chairman, I can make a

motion. I'm sure the subcommittee would be happy to entertain questions at this point.

David Eubanks: I'm sure the subcommittee would be happy to entertain questions at this point.

Arthur Keiser: I would entertain a motion at this time and then we can discuss it.

David Eubanks: Great. So-

Arthur Keiser: Your motion is to accept the report?

David Eubanks: I move that the subcommittee's report be accepted by the full committee and forwarded to the secretary for review.

Arthur Keiser: Is there a second?

Roslyn Clark Artis: Okay.

Jill Derby: I second it.

Arthur Keiser: And who was the first one who said that? I couldn't... With the way, with a thing up there, you can't tell who said that.

Roslyn Clark Artis: Apologies, Roslyn Artis.

Arthur Keiser: Okay, thank you, Roslyn. Discussion? I have a question for you, David, and it especially ties in with what Jennifer was talking about when we were looking at the data, the effect of the pandemic on the outcomes of students. And when we have bright lines, as many of the agencies do, I think we'll see a couple today. And when we have, especially in the programmatic accreditors, the bright lines tend to be... You can't violate them, and if you do, you have a negative action. And in this particular last two years, year, 18 months, our students had had to move from on campus to online. Some of them did it well, some of them didn't do it well. What's your suggestion to the accreditors to deal with emergency or circumstances that have changed dramatically in terms of the academic preparation?

David Eubanks: Thanks for that question, Art. I'd say that question is really outside the scope of the work that we did, and I think it's easy to look at the title Student Achievement and imagine all of the possible questions that could come and there are an enormous number of them. You just raised an excellent question, but we focused on the particular aspect of the changing handbook and rules that emphasized documentation. So we had a much narrower scope than would have permitted us to take up that particular question. However, having said that, I'll let the subcommittees [inaudible 01:10:23] add to that.

Arthur Keiser:	Okay, I have Roslyn be first, Bob will be second, Jill will be third, and Jennifer fourth. Go ahead, Roslyn, you're up.
Roslyn Clark Artis:	My apologies, Mr. Chairman, that was a hand raise to make them, to second the motion previously. I didn't-
Arthur Keiser:	Okay. On all motions, I'm going to be doing a roll call.
Roslyn Clark Artis:	Excellent.
Arthur Keiser:	Okay, so did you have a comment, Bob?
Robert Shireman:	Thank you and I want it to thank David for his incredible leadership on the subcommittee and assistance in pulling together documentation, and highlighting various features, and scheduling conversations with accreditors. It was a really useful process. One of the concerns that led to this committee and which emerged in the subcommittee's discussions, related to, 10 or 15 years ago, a push by the Department of Education and NACIQI for more of this documentation, as Dr. Eubanks mentioned. And that it seemed that in some cases, even though the Department of Education and the accreditors were not explicitly in their standards of requiring enormous amounts of documentation, there was, perhaps, excessive excitement on the part of peer reviewers who started asking or demanding from schools a lot more detail. And as it turns out, as we dug into this issue, a level of certainty about data reliability, the meaning of some data around student learning, that exceeded anything that was actually valid.
	One of the agencies that I will be doing the primary reader on later in this meeting is the accrediting commission on the Association of Theological Schools. And I was looking at the evidence that they provided, which I wish it was available to the public because I could point to things and the public would be able to see it, but they provided copies of the peer review reports for five different schools. On four out of the five schools, the agents, the schools were told that they needed to provide more rigorous, more detail on their assessments. And I pulled up one of them, the one on a school called Columbia Biblical Society, I think is what it called. And there was a page and a half of feedback from the peer review team requiring more frequent and more detailed measurement of learning outcomes in a way that would be more statistically significant, which I have come to understand ,through this subcommittee process, is basically impossible. So it seems as if the agency is asking for the impossible.
	I'm actually not blaming the agency business because I think this has kind of been the result of a culture that is just demanding the impossible from schools, but I am concerned that... And I'm hopeful that the subcommittee report can help relieve some of the pressure that has caused institutions and maybe... Sorry, accreditors, and perhaps, especially the peer reviewers to ask for things

that are not reasonable. And I welcome... I provided this example to Dr. Eubanks and perhaps he has thoughts on it, but that's up to you, Chairman, whether you want to go to him or to other questions. Thank you.

Arthur Keiser: Thank you, Bob. Jill?

Jill Derby: Yes, I just want to make a couple of comments, and the first one is to follow up on what Bob said is, David Eubanks did an extraordinary job of leading this committee, given that we really didn't have staff. He did that work and provided so much information to the committee that made our process so effective. I have to say, as a participant, it was a very rich experience having these opportunities to have informal conversation with agencies, and I think it really provided all of us on the committee with a deeper understanding of the whole process.

I wanted to add that I welcome the comments that Dr. Morgan made this morning. Having served on three subcommittees for NACIQI over the years of my tenure, this was by far the best experience. But I want to add that it was a joy to hear that she welcomes our input on broader ideas than sometimes we've dealt it within the past. Over the many years I've served on NACIQI, we've opined on that, simply doing the recognition process that is in the statute that we do, is very important and an important part of our mission. But NACIQI is composed of members with, really, an accumulation of very extensive knowledge about higher education and I think the subcommittee experience gives this body the opportunity to delve into, in a deeper way, some of the most important issues that are facing the world of higher education today. And that I was pleased to hear Dr. Morgan suggests that she welcomed that kind of input coming out of NACIQI.

So again, acknowledgement of David Eubanks for a very excellent process and I look forward to other opportunities that NACIQI might have to weigh in in this process of a subcommittee.

Arthur Keiser: Jill... Thank you, Jill. Jennifer, your hand is down now.

Jennifer Blum: Yes. No, I just took it down because you were about to call on me. Sorry, Art.

Arthur Keiser: Okay. We do have one public commenter, so before we go to the vote, we will go to our [crosstalk 01:17:44] public commenter.

Jennifer Blum: Well no, I do have a... Sorry. To be clear, I do have one quick comment on the subcommittee front. Is that okay?

Arthur Keiser: Go ahead.

Jennifer Blum: Okay.

Arthur Keiser:	Sure.
Jennifer Blum:	I just wanted to... And it actually is a little bit responsive to your point earlier, Art, I think what's interesting about this report is, I do want to emphasize that as opposed to issues around student outcomes and actual data and benchmarking... And you and I, I think, will share some back, consistent questioning probably in the next few days. This is much more a process issues around learning outcomes. This was, I think... And David, you can correct me, but a little bit more focused on the learning piece. And with regard to the pandemic, I actually think that this is actually an important space. I will caveat that, and I have some familiarity with the Higher Ed Act on this, our role in NACIQI is limited, as is the Secretary's, with regard to learning outcomes. So we went, I think, as far as we can go in the conversation. I think it's helpful, but I would encourage accreditors and institutions to be thinking around and working more collaboratively around learning outcomes to understand the learning process of the students.
	I'm not necessarily suggesting that we rely on benchmarks, and I think we can't statutorily, but I do think, to your point, Art, about the pandemic, understanding as much as we possibly can about how the students, and how the schools are doing, and actually helping students learn is a fundamental area. So that was just the point I wanted to make. It's very much between the schools and the accrediting agencies to work through, but that's the point I just wanted to make real fast.
Arthur Keiser:	Okay. And because this is more of a policy discussion, we have a third party presenter, Dr. Bernard Fryshman, from the Association of Advanced Rabbinical and Talmudic Schools. I'd like to have his comment and, Bernie, you have three minutes.
Candace Evans:	Dr. Fryshman, can you please press pound two on your phone? Please press pound two on your phone so I can identify your line. If you are connected through WebEx, press star three. No one is raising their hand at this time. I'm not sure if he is in the meeting.
Arthur Keiser:	Okay, well, then we'll move on. Is there any other discussion before we call for the vote to present this report to the Secretary? Sensing none. I will go through the roll call, that's how they want us to do this. So, Kathleen, yay or nay? Or, you abstain? Yay. Roslyn?
Roslyn Clark Artis:	Yay.
Arthur Keiser:	Jennifer?
Jennifer Blum:	Yay.
Arthur Keiser:	Ronnie?

Ronnie Booth:	Yes.
Arthur Keiser:	Wally?
Wallace Boston:	Yes.
Arthur Keiser:	Jill.
Jill Derby:	Yes.
Arthur Keiser:	Jill?
Jill Derby:	Yes.
Arthur Keiser:	Oh, I was worried about you.
Jill Derby:	No, I'm here.
Arthur Keiser:	Okay, David?
David Eubanks:	Yes.
Jennifer Blum:	[inaudible 01:21:15] All right, David.
Arthur Keiser:	Paul?
Paul LeBlanc:	Yes.
Arthur Keiser:	Robert?
Robert Mayes:	Yes.
Arthur Keiser:	Mary Ellen?
Mary Ellen Petrisko:	Yes.
Arthur Keiser:	Claude?
Claude Pressnell:	Yes.
Arthur Keiser:	Bob?
Robert Shireman:	Yes.
Arthur Keiser:	Steve.
Steven VanAusdle:	Yes.

Arthur Keiser:	The vote is unanimous and thank you very much. We will now move to our standard procedures as it relates to our reviews of agencies. And-
George Alan Smith:	Art, you forgot [crosstalk 01:21:58] to call Hall-Martin on that one, I believe.
Arthur Keiser:	I forgot what?
George Alan Smith:	I believe you forgot to call Hall-Martin, Molly, the new student. Than
Arthur Keiser:	I did call Molly.
George Alan Smith:	You did? I'm sorry.
Arthur Keiser:	Yeah, no, no. I went right down your list, George. Thank you for giving it to me, it made it easy. We will now go into the review of accrediting agencies. Let me go over the procedures and the processes that we do that. We're pretty structured in the way we review the agencies. I will introduce the primary readers to introduce the agency applications, then the department staff will provide a briefing, and if there are questions by the committee to the staff, they will make them. Then the agency representatives are called on to provide comments. At which point, we will also have the members of the committee ask questions to the agency representatives. Then if there are third party comments, we will have the third party comments. Then the agency has a real opportunity to respond to the third party comments, and then the department staff report respond to the agency and the third party comments. And finally, we have a discussion and a vote, and I would ask that the lead reader provide a motion in order to begin the discussion.

Okay. Any questions regarding that process and procedures? Seeing none, we'll move to our first- |
Robert Shireman:	Yes.
Arthur Keiser:	I had a yes?
Robert Shireman:	Mr. Chairman, yes, this is Bob Shireman. There was a comment earlier from [Miss Laitinen 01:23:36] about the timing of public comment in our standard procedures and I wanted to bring up the question of whether that's something that... I don't know where these procedures come from or if it's the kind of thing that we can change or adjust. It did seem true to me that the public comment tends to come quite fully when the committee has kind of gone through a lot already. And so I wanted to bring up whether that's something that we would want to make an adjustment to at this meeting or consider for a future meeting? [inaudible 01:24:16]
Arthur Keiser:	We certainly could consider for a future meeting. I don't think... Because we have it published in our, exactly the process that we are going through, in our

agenda. But Bob, the agency usually, I think, has that, should have an opportunity to present their petition before third parties comment on it. That would be just my opinion from doing this for a long time. But again, we're open for discussion on anything that you'd want to do. I'd rather not go into the discussion of this, Jennifer, if possible. I just think because it's published in the agenda, Bob, we'll stick with it and then we certainly can discuss it afterwards, if that's okay? Especially at the end when we have a policy discussion?

Robert Shireman: Cool. That sounds good. Thank you.

Arthur Keiser: Okay?

Robert Shireman: Yep.

Arthur Keiser: So our first [crosstalk 01:25:05] Yes, George?

George Alan Smith: I think that Bernie is still available. I think he misunderstood the instructions on the buttons he should've pushed to participate. He would like to be heard, so I'm just letting you know that we've been emailed about that. Is that [crosstalk 01:25:23] I know we voted to [inaudible 01:25:24] off, but it-

Arthur Keiser: I think we should hear Bernie. Bernie is a former member of this group and certainly is... Is he on or available? [crosstalk 01:25:35] [Miss Webanth 01:25:35]?

George Alan Smith: ... agency. Yeah.

Arthur Keiser: Bernie, are you there?

Candace Evans: Can you press pound two on your phone, please?

Arthur Keiser: We're back where we started.

Candace Evans: He's raised his hand.

Arthur Keiser: Bernie, are you there?

Candace Evans: Please go ahead.

Bernard Fryshman: Yes, I am, and I've been listening intensely, and I'm sorry I wasn't able to comment before the vote; although it would probably not have changed anything.

Arthur Keiser: Bernie, you have three minutes.

Bernard Fryshman: Okay. I just wanted to say that this is the second time I'm addressing you on the work of the Student Success Subcommittee, and have yet to see the report that

I'm supposed to be commenting on. More to the point, even if I were privy to the report, I have no more than three minutes to speak. Now, I grant you that anything done with the involvement of Dave Eubanks is going to be well thought out and a quality product. I very much admire his work, but this is going to be a NACIQI document. And as such, it should have been subject to wide discussion, to debate, to challenge, and to review. More input from the million or so faculty members with decades of direct, real world experience on student success should have been invited.

NACIQI and its members are important, and advice to the Secretary should be able to withstand the most intense scrutiny. Far too often, untested hypothesis became public policy with untold harm to students. And I will point to irresponsible uses of quantitative measures of learning as a perfect example. So I respectfully urge that, in the future, there'd be a great deal more transparency on the part of the NACIQI subcommittee work and broad invited comments from communities of interest and expertise.

Thank you all for your work. I very much admire your work. And Dave, I'm sure the work is extremely good. I appreciate the opportunity to be heard and I strongly urge that if America is not going to be hurt by public policy which is untested in the most intense scrutiny, I do appreciate... I hope that you will look for increased transparency and involvement. Thank you very much.

Arthur Keiser: Thank you, Bernie. And again, that seems to be an important theme that's going on throughout the committee. Okay, I'll now go restart with the beginning of our renewal of recognition. The first commission... Could somebody mute, please? Somebody unmuted, okay. Bernie, are you off? I think he is now.

The first agency is the American Psychological Association Commission on Accreditation. The primary readers are Mary Ellen Petrisko and Roslyn Clark Artis. The staff is Stephanie McKissic. And we will have two agency representatives who will come up, and I'll introduce them as they come up. Mary Ellen, Roslyn, the floor is yours.

Roslyn Clark Artis: Thank you, Mr. Chairman.

Mary Ellen Petrisko: I will do the introductory comments on the APA CoA. American Psychological Association Commission on Accreditation is a programmatic accreditor that currently accredits over 900 professional education and training programs at the postdoctoral level in psychology. More specifically, it accredits doctoral programs in a clinical counseling school and combines professional scientific psychology, doctoral internship programs in health service psychology, and post-doctoral residency programs in health service psychology. The agency has identified multiple federal programs that require the Secretary's recognition of its accredited programs as a prerequisite for programs to participate in non-Title IV federal program and/or federal employment, including the department of Veteran Affairs and the federal prison system. The APA CoA has been

continuously recognized by the Secretary since 1970. That concludes my initial comments.

Arthur Keiser: I'd like to invite Stephanie McKissic to make a presentation, please?

Stephanie McKissic: Thank you. Good morning, Mr. Chair and members of the committee. My name is Dr. Stephanie McKissic and I am providing a summary of the review for the petition for renewal of recognition for the American Psychological Association Commission on Accreditation, or APA.

The agency was found noncompliant with criteria in 602.16(a)(1)(ix) student complaints, and needed to provide clarity on which policy would take precedence for a program recordkeeping of student complaints and grievances when there were conflicting time periods. However, the agency has submitted documentation to the department, that its Commission on Accreditation has since met, and a final modification of its implementation regulations now provides clarity as required.

The staff recommendation to the senior department official is to renew the APA's recognition for a period of five years, subject to the commission of a compliance report due in 12 months and a review and decision on the compliance report. In the event that recognition is continued following a decision on the compliance report, the period of recognition will not exceed five years from the date the renewal of recognition is issued by the senior department officials. This recommendation is based on my review of the agency's petition and its supporting documentation, as well as a file review, a virtual file review, site visit ,and observation of a virtual board meeting held in October, 2020. The department did not receive any complaints and there were no third party comments during this recognition period. Representatives from the agency are here to respond to your questions. Thank you.

Arthur Keiser: Great. Mary Ellen, Roslyn, do you have any questions for the staff?

Mary Ellen Petrisko: I do not.

Arthur Keiser: Any other committee have questions for the staff?

Roslyn Clark Artis: I do not.

Arthur Keiser: Okay, seeing none, I'd like to call up the two representatives from the agency, Georita Frierson, Chairperson of the American Psychological Association, and Jacqueline Remondet Wall, Director and Program Consultant of Accreditation for APA. If you could let them into our presentation? Okay. One, two, I see both of you here. Good. The floor is yours.

Jacqueline Wall: Well, good morning, Chair Keiser and members of the committee. Can you hear me?

Candace Evans: Yes, we can. [crosstalk 01:33:17]

Jacqueline Wall: Thank you. Thank you for the opportunity. Thank you. Thank you for the opportunity to join you today to discuss the American Psychological Association Accreditation's petition for continued recognition. I'm Jackie Wall. I represent the APA as the Director of the Office of Program Consultation and Accreditation. The office supports the work of the APA Commission on Accreditation.

I am joined today by Dr. Georita Frierson, who is currently Chair of the commission. Dr. Frierson joined the commission five and a half years ago, and she assumed the role of Chair in January of this year. Trained as a clinical health psychologist prior to this, currently at D'Youville College, where she has served as interim Vice President for Academic Affairs and Dean of the School of Arts, Sciences & Education. Next month, Dr. Frierson will become the Dean of the College of Arts and Sciences at Seton Hall University. Seton Hall has a CoA accredited doctoral program in health service psychology. I will provide a brief, further introduction to the APA Commission, and we will both be available to answer your questions.

Before I continue though, I would like to express the appreciation and thanks to Mr. Herman Bounds and members of the Accreditation Group of the Department of Education. I'd particularly like to thank Dr. Stephanie McKissic, the department staff member who has reviewed our petition, visited a commission meeting virtually, examined our materials, and provided guidance throughout this process. We are grateful for, and appreciative of, her careful review, insights, and responsiveness to our questions.

The APA Commission on Accreditation accredits doctoral, doctoral internship, and postdoctoral residency programs in health service psychology. At present across the three levels of training, there are 1,235 accredited programs. 408 at the doctoral level, 652 at the internship level ,and 175 at the postdoctoral residency level. Programs are evaluated by the 32-member commission, which consists of 27 representatives from... Excuse me, representatives from the broad fields of psychology, which includes nominations made by 13 different education with training groups, some within and some from outside of the APA.

The commission represents an exceptional group of educators and practitioners across the range and breadth of specialties in the field. In addition, one commissioner is the student trainee who is nominated by the APA Graduate Student Association. Two commissioners are psychologists at large, and thereby, not affiliated with any group. And two commissioners are non-psychologists and serve as our public members. All of the commissioners are volunteers who share their time and deep and broad expertise and perspective to review programs for compliance with the conditions of accreditation standards, and establish and review commission standards, policies, and procedures. The commission works under the principles of autonomy in decision making, transparency in the development of standards and policies, and confidentiality in the management of program review. We look forward to

answering any questions that members of the committee may have regarding information submitted in our petition or other areas of agency's compliance with the Secretary's criteria.

As an initial matter, though, I would like to briefly note that, with respect to the one area highlighted by the staff report that required follow up related to the maintenance of records of student complaints, the commission has clarified its policy. On July 7th, the commission revised the policy document to clarify that accredited programs must retain records for the longer of the period required by applicable legal requirements or until their next site visit. So that issue has been addressed. Thank you again for this opportunity. We would love to hear questions now.

Arthur Keiser: Mary Ellen? Or Roslyn? Do you have questions?

Mary Ellen Petrisko: Yes, thank you. Thank you, Mr. Chairman, and thank you, Dr. Wall. And good morning to both of you, Dr. Frierson and Dr. Wall. I have a few questions. And the first question is a pretty broad and general one, but I think an important one, and that is, you stressed that the programs that you accredit are to address national and regional needs with regard to the areas of the scope of your program. So my general question is, how to [inaudible 01:38:44] anybody assess those greater needs as national needs, in particular, for mental health services? And how your programs are addressing those? And I would note, if you heard the introductory comments from Dr. Morgan, specific funding in the American Rescues Act has been dedicated to mental health counseling. If you could just address that, generally, how do you see this? How do you assess the needs? And how are your programs responding to this? Especially now, I would say, for schools and the mental health issues that we've seen in schools across the board.

Jacqueline Wall: Certainly. Dr. Frierson, would you like to respond to them? Or would you like me to start and you follow?

Georita Frierson: I'll let you start Dr. Wall, then I can follow.

Jacqueline Wall: All right. Well, certainly the commission has the opportunity to examine outcomes of individuals who have graduated from their programs, from the accredited programs, is always looking at needs for the profession more broadly in terms of employability, in terms of growth in programs, growth in the number of graduates, and has really dedicated itself towards ways that it can improve the quality of education provided, in accord with having programs that meet the prerequisite standards. The commission accredits programs in the practice areas of clinical counseling and school psychology, and works with knowledge of the training and educational council in those areas to incorporate ideas into accreditation practice.

Mary Ellen Petrisko:	Can you say something about what's been seen almost as a crisis in schools with the mental health issues with students, and how are your programs responding to that? Dr. Frierson, perhaps you can address that?
Georita Frierson:	Yes. I can further explain that all of our programs have specific aim and competencies and so, looking at their areas that's inside their region. They also have a clinical training piece at the doctoral level. Internship is more clinical, and postdoc is even more clinical training. So many programs, specifically speaking about programs I have been the director of in the past now, you have either sliding fee scale payments at your clinic or your practicum placements, or there's free services at the practicum placements. So there is a response to this urgent crisis that has always been there, but it continues to be a focus. And we can continue to look at this question too at the commission, given your concerns with this area.
Mary Ellen Petrisko:	Thank you. You've touched on another area for my second question. And that is, your standards are pretty explicit in a number of places regarding online programming and I'll just quote one of the several that you have there. "A doctoral program delivering education and training sub-"
Jacqueline Wall:	Up there. A doctoral program delivering education and training substantially or completely by distance education is not compatible with the standards of accreditation and could not be accredited, and you explained why, and it makes perfect sense. So my question is, what in your programs, in particular the clinical programs, how does this carry us during the pandemic, and importantly, what have you learned about that, and do you anticipate that there might be any changes to your standards in this regard?
Speaker 2:	That's a great question. Can you repeat it? I'm sorry. My apologies. Okay, Dr. Wall, can you answer that question, is that okay? And then we can have chime in? Thank you for that question, and, to go back to my response.

So, as you mentioned, currently, the commission on accreditation does not accredit doctoral programs that offered using distant education methods exclusively. We do have a policy implementing regulations, C-5D and C-11D, that excludes these programs using fully or substantially online from being eligible, and you mentioned that already, however, some programs may offer courses online or utilize some non-traditional distance education methods, but the COA has the in-person residency requirements that must still be met. While our programs provide instruction using distance methods, instruction evaluation is in accord with in-person standards for coverage. We had some changes with the pandemic, as you mentioned, but they are only temporary until the national emergency has been resolved, and then we have six months to go back to pre-pandemic policies.

We have noticed from feedback from our publics, ma'am, that people are interested in maybe doing more, I want to say distance education, but potentially more distance training with clinical work, how they do supervision. |

So we're noticing that they're trying to do more of a hybrid with supervision versus being in the room, but this depends on the state as well that you live in and the parameters of that area. But that's what we're noticing so far, is that clinical has more, the clinical practices are more maybe impacted in a positive way. We're reaching more groups, but often, how do you do supervision as well? Meaning the clinical supervisor for the mentee. I'm not sure if that answers some of your questions.

Mary Ellen Petrisko: I did see that you have provisions for tele-supervision. I guess the question was really, I think the interaction between the client or the patient and the intern, or the doctor or resident, and I guess that is happening also virtually by screens at this time, and they're learning from that, and we are [inaudible 01:44:52] change that. Did I get that right?

Speaker 2:   Yes. Dr. Wall is about to answer a primary clarification?

Jacqueline Wall: Sure. Certainly the impact of the pandemic has been profound on training in all of our programs, and the majority rules to tell instruction, just instead, tele-supervision, tele-practice, because no one was in the facility. What we have found is that there is an interest in academic programs across levels to continue in this delivery, and the commissioner is having conversations about whether or not any of the standards will be modified. As a consequence, when you have a profession based in a tradition of in-person supervision to engage in the relationship that happens between a supervisor and a supervisee, making that transition to little boxes on the screen is certainly not something that will be done quickly or without the thought, or the evaluation of evidence. So I'm not sure if I got the pieces of [inaudible 01:46:09] communication, if people were wanting to know more about-

Mary Ellen Petrisko: It was about what you're learning and whether the commission is looking now at what changes might be made in other standards or policies to address that, and so you have answered my question. Thank you. I found it very interesting that you require programs to provide evidence of graduates, competencies, and program effectiveness two years after graduation. I think a lot of institutions and a lot of accreditors would love to see that that is actually something that absolutely must be done, that you follow students, you follow graduates to see their effectiveness. So I'm just wondering how well the programs manage this? Don't graduates sort of disappear sometimes, and they can't track them? It is a requirement, so how did the programs manage that?

Speaker 2:   Well, I want to start with that one, and let me sort of address, the two years is because every state has different requirements for post-doctoral supervision to be eligible for licensure, and so that's the reason that the initial assessment is that two years is for doctoral program. Then the second assessment is at five years post-graduation. And I found that training directors, or the people who are responsible for collecting this information are incredibly innovative in keeping track of those whom have attended their program. I've learned, and I've also been a faculty member, so I learned of all sorts of very innovative ways to

keep tabs on where folks go, but psychology is a relatively small community, so to speak, so I think that some of that tracking is a little bit easier than many folks would truly surmise.

Jacqueline Wall: Thank you. Just a couple more questions. There's a great emphasis, I think, which we would all applaud, on diversity of student bodies and faculties in your standards. It's also noted in your standards that you do not have bright lines. Bright lines were mentioned a little earlier, and you do not have bright lines. So my question is, with regard to sufficiency, in students and faculty across the programs, how do you review and determine what's good enough? Where institutions are falling short, given that you don't have bright lines, and a question I'd really like to hear, have institutions ever been found out of compliance with those standards? What can you tell us about that?

Georita Frierson: That's another great question, Dr. Wall, I can try to take the first stab at this and then you can chime in. So while there may not be seen as having bright lines, we have a consistency of reviewing programs regarding their recruitment efforts for students, faculty, and staff. There were tension efforts for students, faculty, and staff at the doctoral level. We look at recruitment only at internship because it's typically one year, and also post-doc is one to two years, and then we look at evaluation of those efforts. So, programs need to give us a consistent long-term plan, systemic, systematic plan of how they're doing these efforts for recruitment and retention. And we say efforts, ma'am, we mean more than one. So some people do the full gamut. Some people do less. We also have a COA update, or we do these mid-winter meetings where we kind of educate our public and our programs about what we're looking for, relatively speaking, without being too prescriptive.

Also, with the evaluation pieces, is not just check the boxes. It's more so what are your strategies that you're doing? Because some people may live in a diversity hotspot or diversity desert. So we know that sometimes you can't just be based on where you live in. When programs are out of compliance, it's more so we do have some programs that do not have a systematic long-term plan of recruitment efforts or retention efforts, or they do not have an evaluation plan of the recruitment or the retention. So there can be numerous, let's say, flags, reporting requirements that programs do get, so they may not be seen as bright lines, but for us, we do have processes behind the scenes to make sure that we're consistent as commissioners when we're reviewing the program with the recruitment, the retention efforts, students, faculty, and staff, and also their evaluation of each of those efforts at each of those levels.

We do talk about these extensively during our meeting, we take this seriously, as you do, as we're speaking, and I will share with you two personally being an alumni of Hampton University historical black college, and being the prior director of the APA credit program of clinical psychology at Howard University, diversity can be seen in various ways. One thing that we see at the commission is the addressing frameworks. That can be age, disability, race, ethnicity. So we are very comprehensive and we're also very specific, meaning that programs

can pick and choose what they see as diversity laws. They let us know what that is. But when programs are out of compliance or not meeting the standard, we do have a way of being systematic behind the scenes to let them know. And we do also educate our publics about what we look for relatively speaking, without being too prescriptive. I'll stop there and see if Dr. Wall has anything else to add.

Jacqueline Wall: Thank you [inaudible 01:51:57] for your response. I think the only thing that I would add is if the program is found to be marginally compliant or adequately compliant, they're giving a response, or they're given a requirement to respond to the commission. If their response to the commission is insufficient, the commission has the right to put the program on 'show cause' status, and placed on probation. During that timeframe, if a program is continuing to maintain inconsistency with the accreditation standards, they do have the right, and are encouraged [inaudible 01:52:42] the office. We have 18 people who can, many of whom can provide explanation of the accreditation requirements, not tell the program what to be, but explain explicitly what the program would not be doing right by clearly demonstrating what is written in policy and procedure, and we found that that process is incredibly effective in helping programs acquire the knowledge that they need to be able to demonstrate compliance with the accreditation requirements.

Mary Ellen Petrisko: Thank you. I would, I would just hope that, and I've seen it many times that the efforts in this area or for exactly what Dr Frierson has said. Having the plan, having recruitment efforts, et cetera, and I would just hope that the evaluation of how effective those are is just as much of important as anything else. You've got great plans. Your recruitment strategies are the right strategies, et cetera, and when they fall short, there is a comment about that, although there are no bright lines.

I have one last question before I turn it over to Dr. Artis, and that is your standard state of quote, appropriate [inaudible 01:54:05] any time.

Speaker 3:   You're breaking up, Mary Ellen.

Mary Ellen Petrisko: [crosstalk 01:54:12] COA, of its intent in writing [inaudible 01:54:16] in regards to volunteering- is this better? Is this better?

A program they voluntarily withdraw according to your standards, but it says that that request to withdraw goes before the commission, and placed on a vote. So I wonder whether voluntary withdrawal really as voluntary, and if there are circumstances in which a voluntary withdrawal would not be permitted.

Speaker 2:   Dr. [inaudible 01:54:48] would you like me to start that one off?

Speaker 4:   Well, certainly programs kind of withdraw from accreditation. For doctoral programs that want to withdraw, they do so because [crosstalk 01:55:03] closures, and the program would submit a request to the commission, talk

about their plans to withdraw, talk about what they would be doing, in essence, to teach out to students who were currently enrolled, and demonstrate that there were appropriate resources, I.E. [inaudible 01:55:21] that says, "Supervision for research or clinical work", the kinds of things that would need to happen to shepherd the rebating students thru their program, and then they would have to report on that every year until the last student had left the program, hopefully by graduation. Then they would be doing complete withdrawal.

The times that that would be compromised, would be if the program said they were closing and they have a certain number of students left that they weren't going to provide the resources for those students to finish, and it wouldn't be necessarily that they would be immediately denied, but it would be through the review process that the program is given opportunities to [inaudible 01:56:15] demonstrate compliance so that their students could finish internships and post-doctoral programs, because of their abbreviated nature tends to submit a request to withdraw as long as they get students enrolled in the program or students plan to come in during the next year, and the kinds of things that would limit how it would carry withdrawal for those clinical experiential programs, would be that there were students coming here.

Thank you. That's very helpful, exact. Rather than talking about withdrawal, they're talking about program closure, that would signal to me what you just talked about. If a program is no longer going to continue and withdraw from accreditation, it needs to have [inaudible 01:57:03] plans, et cetera. So it's a language issue, and you may want to consider that for your standards to make clear what that's about. Not just an institution, a program saying we don't really care about accreditation anymore. With that, I will turn it over to Dr. Artis.

Roslyn Clark Artis: I do not have further questions, but with the first two I believe Jennifer Bloom indicated she had questions for the panelists.

Jennifer Blum: Thanks so much. I'm here. So actually, I just want to take one second to say, because at the beginning, when you started talking, I was off screen. I just want everybody to know I'm going to say whatever, I am dealing with a family emergency. So I'm listening and I'm doing as much as I can, but when I go off screen, please don't interpret it as, some other, if anybody can witness me, I love being on the CT, so, but my question is, going back to Mary Ellen's, I appreciate Mary Ellen raising on the ... Since I too actually have some questions, the first one that relates to the online piece, and I want to actually put a finer, maybe add to what Mary Ellen said about the sort of trajectory of APA with regard to distance education. I will share that I was hopeful that when I saw that you were up this [inaudible 01:58:23] that we might see an expansion of scope relating to doctoral programs.

I'm not really sure if that's required here or not, or what your ... But I'm hoping that there were positive takeaways that the APA can move past. You used the word tradition, but I use the word a bit antiquated because from a therapy

standpoint, I certainly know within my family, and I know everybody in this community, even pre pandemic telemedicine, teletherapy has become somewhat the norm. And I'm speaking as particularly when you think about rural areas, and we also, from a clinical standpoint, I do have some familiarity when on the academic side. So from a clinical standpoint, we need to figure that out, because we need to understand how to provide clinical experiences for those who want to be psychologists who live rurally, we need it desperately, and so while you call it a tradition, I call it antiquated to be candid.

So I was quite hopeful that we would see an expansion or hear about an expansion of scope. I'm really hopeful that for whatever period we renewed, that in between, we'll see you again before that renewal to hear about that. I don't know if you want to respond to that before I ask my next question, but I just want to really emphasize the urgency of creating a new tradition around distance ed and psychology.

Georita Frierson: We thank you for your feedback and your honest concerns in this area. We will take this under review and bring this back to the chairs, to the commission, for further review, and Dr. Wall, wants to add additional information about this, at this time.

Jacqueline Wall: The commission will be discussing this.

Jennifer Blum: Okay. And then my second question, which is actually not completely unrelated is, while I understand licensure, and I know that, first of all, let me preface. I know that you don't control state licensure boards. So let me just preface, I'm not asking for somehow the APA to become super engaged with what the positioning of the licensure boards is in 50 states ... Having said that, because of the APA's positioning on distance ED, because there are many states that limit students, or graduate licensure, I should say, to graduate APA ... graduates from APA programs, we have a secondary problem where students who are attending programs by distance ED, for various different reasons, then faced licensure challenges in many, many states. This is a serious, serious, in my view, mental health problem in the United States that's not being appropriately dealt with. So I'm just curious what the APA's position is with regard to state licensure boards that require the APA recognition, and they may have alternative pathways for graduates, but those are quite burdensome for the graduate. So I'm curious to hear your perspective on those philosophies of the state licensure board. Dr. Wall, I can defer to you first.

Jacqueline Wall: Sure. Well, certainly my role is to support the commission on accreditation, and even though I do have contacts at collections, and am informed about licensure board, it's just, my role is to purely support the commission. So, it's beyond the scope of what I do as a representative of the commission. So, I'm not sure that I'm in a position to address what the association, or the commission is in regards to licensure, I hope you can appreciate that.

Jennifer Blum:	I think I can appreciate it except for my first point, which was the faster you move to be more accepting of distance education, the more likely this dearth that we are facing in terms of the ability to teach students remotely, who live remotely, I don't mean remotely technology wise, who are in rural areas. The sooner we resolve that national problem.
Arthur Keiser:	Okay, we have Bob, and then, Well, Claude, you had your hand up, is it down now? Okay, Bob, you're up.
Bob Shireman:	Thank you. Thank you very much for your presentation, your application materials that the agency provided. At the March meeting of [inaudible 02:03:40] that we just had, I asked all of the agencies about the public members of their conditions, and we had a couple of agencies that treated the public member requirement rather cynically, complying perhaps with the technical requirements, but certainly not the spirit of the requirement. Thankfully, your agency seems to take the public member requirements very seriously, going well beyond the baseline department's definition. Your application says that your standards require representatives who represent consumers, and are outside of the discipline of professional psychology. Can you tell us a bit about, in a way, an evolution that got you to the point of really thinking through how your public members of your commission, what they should represent, what you look for in them, and feel free to tell us about some of those who play that role, if you'd like.
Jacqueline Wall:	Sure. I'm [inaudible 02:04:52] Dr. Frierson, because I might have a little more [inaudible 02:04:57] information than you do. The commission valued having public members serve, and even though I don't know that we are really required to hear public members on the commission, given the nature of the work that's done, we do have two individuals who sit on the commission that are not psychologists, they're not members of the APA. They are not affiliated, employed by, enrolled in an accredited program, or a program that may become accredited. They are clearly representative of other fields, other professions ... They're not even married to a psychologist, so they're not part of the profession. These are people that are unpaid, they're truly representative of public tantrum.
	They clearly contribute from their own perspective on the value of training. Now, of course we don't give them the 1000 page application to review, they're typically secondary reviewers, so they only get 500 page application to review. They are truly, truly, truly valued for their contribution. We have had people who've been librarians, who've been medical technologists, who have been dentists, who've been bio-ethicists, we currently have an attorney, we've had someone directed human research protection boards, and these guys bring a perspective that is just so unique to everyone who's trained in [inaudible 02:06:48], so I cannot speak highly enough about them. Dr. Frierson, would you like to add some more [crosstalk 02:06:58] before you do though, I believe that there have been public members, well, certainly from before I was part of APA, so it's been an extended part of the committee.

Bob Shireman:	The only thing that I like to add to the great question that's asked to Dr. Wall and myself, is that our public members can also take leadership roles as co-chairs for various work groups. So we see their input as being very integral and vital in the work that we do, and we take their roles very seriously. So they're also just not reading the 500 page document that Dr. Hall mentioned, they're also doing additional leadership responsibilities too, in tandem with the psychologist on the commission. Thank you.
Bob Shireman:	You so much. That's all from me.
Arthur Keiser:	David?
David Eubanks:	Thank you. Thank you for the presentation. I found it very clear and easy to read. I had just a quick question. In our review with the subcommittee, we talked to accreditors about what kinds of evidence were appropriate for student learning and almost uniformly, there was a discouragement to these course grades, but I didn't detect that in the self-studies, or the peer review comments. It looks like for APA, it's okay to use course grades. That is my understanding, correct?
Georita Frierson:	I might just jump in on Dr. Wall. So yes, we do allow people to use course grades depending on what the learning outcomes they're looking at. They may need to actually have different layers of the course grades, so it's not just the overall course grade covering various foundational areas of like, effectiveness and cognition. One course grade will not tell us if they pass effective and cognition, so they may have to kind of parse out the course grades somehow, but we do allow course grades with specificity when needed for a foundational or our competency areas.
David Eubanks:	Okay. Because I'm looking at a comment from a peer review, it says, for psychometric scores, "Course grades are the primary mechanism of evaluation." Does that mean just like an ordinary A, B, C?
Georita Frierson:	It could be, yes.
David Eubanks:	Okay.
Georita Frierson:	Or it could be a comprehensive exam, but we're not prescriptive. As long as it aligns with their competencies and their goals and objectives, or, sorry, their eight. Yeah.
David Eubanks:	Great. Thank you.
Art Keiser:	Any other questions? Well, thank you very much. I'll call back the eight. We do not have any third-party commentors. So I'd like to bring back to department staff. Stephanie McKissick.

Stephanie McKissic:	Thank you. I have no additional comments. That's fine.
Arthur Keiser:	I have a question for you, Stephanie. How many members ... I had a hard time, I went through the document and, how many members are there on the commission?
Stephanie McKissic:	I'll have to go into the document, but if Dr. Wall and Dr. Frierson would like to respond, let me go back into my petition.
Georita Frierson:	Dr. McKissic, I can answer the question. There are 32 members.
Arthur Keiser:	And Stephanie, if there are only two public members, how do they meet the one to seven requirement?
Stephanie McKissic:	I'm sorry, Mr. Chair, I'm trying to get into my petition. So when I was from my review of the-
Arthur Keiser:	I'm sorry we lost you. Stephanie, we lost you.
Bob Shireman:	I think I may have a partial answer to that. I think because they're a programmatic accreditor, the one to seven does not apply.
Arthur Keiser:	They're not institutional? It looked like they were.
Bob Shireman:	I could be wrong, but [crosstalk 02:11:18] ...
Jennifer Blum:	Dr, they're not institutional.
Arthur Keiser:	Yeah [inaudible 02:11:18]. They're not institutional?
Jacqueline Wall:	No, and we-
Arthur Keiser:	Then I apologize, that would be the right answer. Herman?
Herman Bounds:	No, you just answered. I was going to say they're programmatic purely, so you don't need to meet the one seven requirement.
Arthur Keiser:	I'm sorry. Okay. Bob and [inaudible 02:11:40] did you have your hands up, or is that just because you left him out?
Bob Shireman:	I'm all right.
Arthur Keiser:	Does anybody else have questions for Stephanie? Sensing none. Thank you very much, Stephanie. Thank you very much, Ms. Frierson and Ms. Wall, Dr. Wall. Primary readers, do you have a motion you'd like to make?

Mary Ellen Pertrisko:	Do we got to get staff recommendation so that we can see that for what they [inaudible 02:12:16] what the action would be?
Speaker 2:	I have this, if you'd like.
Mary Ellen Petrisko:	Dr. McKissic read it, but we don't see it, and the sheet that I have is slightly different read.
Speaker 2:	I would offer a motion that we renew the agency's recognition as a nationally recognized accrediting agency at this time, subject to the submission of a compliance report due in 12 months, and the review and decision on the compliance report. In the event the recognition continued, following a decision on the compliance reports, the period of recognition would not exceed five years from the date of decision on the renewal of accreditation as issued by the senior Department of Commissions.
Arthur Keiser:	All right. Good luck. Is there a second to the motion?
Mary Ellen Petrisko:	Second.
Arthur Keiser:	Further discussion. Okay, we'll move to a vote then. Hearing no more discussion. I'll go down a roll call. Kathleen?
	You got to unmute yourself. Kathleen. Unmute yourself, Kathleen.
Kathleen Alioto:	Oh, yes.
Arthur Keiser:	Okay. Roslyn?
Roslyn Clark Artis:	Yes.
Arthur Keiser:	Jennifer? Jennifer? She may not be there. I'll come back to Ronnie?
Jennifer Blum:	I'm here, yes, sorry. Not sure, it wasn't un-muting for some reason. Yes.
Ronnie Booth:	Yes on Ronnie.
Arthur Keiser:	Wally?
Wallace Boston:	Yes.
Arthur Keiser:	Jill.
Jill Derby:	Yes.
Arthur Keiser:	Molly.

Molly Hall-Martin:	Yes.
Arthur Keiser:	Robert.
Robert Mayes:	Yes.
Arthur Keiser:	Mary Ellen? Claude?
Mary Ellen Petrisko:	Yes.
Claude Pressnell:	Yes.
Arthur Keiser:	Steve.
Steve VanAusdle:	Yes.
Arthur Keiser:	Is Michael Lindsay, is he here? I think he was here. Yeah, I'm on the list. Well, it appears the motion is passed. Thank you very much. Thank you, members of the agency. Thank you, Stephanie, and we are now, let's say, we're about 40 minutes early.
Jacqueline Wall:	Right.
Arthur Keiser:	Which is good. Do we want to go to the next agency or do we want to move lunch up, or do we want ... George, what's your recommendation? George just walked away.
Bob Shireman:	Yeah, I'm just curious if we have to, since it was publicly ...
Arthur Keiser:	No.
Bob Shireman:	... That we need to hold to the timeframe based on the schedule.
Arthur Keiser:	We do not. In fact, it says on the agenda that all times are subject to change and have everybody should be ready at any time.
Bob Shireman:	Great.
David Eubanks:	So you ... Oh, go ahead.
Roslyn Clark Artis:	I was going to recommend that we move forward then, however George may differ.
George Alan Smith:	No, I don't. In fact [crosstalk 02:15:30] the agency is ready, and you usually just change it depending on the feel of the pace of the meetings. So I'm hoping to move forward.

Arthur Keiser:	Okay. I think the next one is going to be a little longer, so we may have a delayed lunch, but that's okay with me, because I don't need to eat anymore, ever. Okay, we'll move to the next agency. Now I am going to have to leave you, because I'm going to recuse myself from this meeting. So I'm going to ask Claude to take over the meeting, and at the same time I would ask someone-
Arthur Keiser:	And at the same time, I would ask someone to call me when you are finished with this. And at least I'll know when lunch begins. So, we'll still have 45 minutes for lunch, but it'll be at the end of this. Claude, you are the chair. Kathleen, are you saying something?
Kathleen Alioto:	No, I had filtered out this ACCSC, some of the data on the various [inaudible 02:16:41] documents that the department has given us [inaudible 02:16:47]. And I would like to send that to the other members, but I don't know exactly how to get that done. So I wondered.
Arthur Keiser:	I think, well, I'll leave that up to you Claude to decide what you want to do. I don't think it's appropriate for me to discuss it. So I'm going to leave the event, and I will be back after this agency. Thank you.
Claude Pressnell:	Thank you, Art. So Kathleen, again, exactly, could you describe what you're trying to accomplish?
Kathleen Alioto:	We have the analysis of the department that's in one of the documents that was given to the committee in terms of accreditations. And I have filtered it out so that I have all the ACCSc in one document. Then I have another one on the 9010, and another on the other data, as well as my colleague, who has come up with some very good material on student success. So, I'd like to be able to send that to the rest of the committees, so that they can look at it. Because it's such shocking material from my perspective. It should be included in our analysis.
Claude Pressnell:	Okay, Kathleen, could I suggest that during our Q and A, that you would present your findings? For the committee to review documentation during the hearing, I think would be rather distracting. Because they're not going to hear the deliberation, or ...
Kathleen Alioto:	Mm-hmm (affirmative).
Claude Pressnell:	So, would it be possible for you to just summarize what you have found, since we're in the midst of the review? We're going to begin the review here in a moment.
Kathleen Alioto:	Well, that's fine, but I think that segregating out instead of members of [inaudible 02:18:56] looking at the material and trying to pull out what I'm going to be saying, it would be much easier if they could just see it for themselves.

Claude Pressnell:	There were emails sent that included all the committee members. So if you want to just hit a Reply All on one of those, and send the materials, that'd be fine. But I think that when we have the Q and A, I'm definitely going to call on you to present. You can ask any questions you want, or add any deliberation you want during the Q and A.
Kathleen Alioto:	Okay, well, what I would like to do is if asked the department, the department has given a green light to this agency. I would like to ask the departments questions based on the score cards before we even hear from the agency.
Claude Pressnell:	Well, you'll have an opportunity to ask questions of the staff member, of [Reha 02:20:06] Mallory. So, you'll have an opportunity to do that.
Kathleen Alioto:	Yeah, okay. Well, that's good.
Claude Pressnell:	Okay, all right. So this is going to be the Accrediting Commission on Career Schools and Colleges, ACCSC. Kathleen is a primary reader along with David Eubanks and the department staff is Reha Mallory. There are going to be four representatives from the agency who will present later on. And at this point in time, I have five third party comments. So, we have quite a bit to move our way through. So, Kathleen, do you want to go ahead and introduce the [crosstalk 02:20:46]?
Bob Shireman:	Claude, could I ask a process question or make a request?
Claude Shireman:	Yeah, go ahead, Bob.
Bob Shireman:	Thank you. Art was implying that we might delay lunch until we finished this agency, which I think is not realistic. And I, and perhaps other West Coasters ... I have not yet had a breakfast. And so, I would love to have lunch on time, and start the agency, and then continue after that, assuming we do not finish in the next half hour or so.
Claude Pressnell:	Okay. Well, I tell you what my personal preference would be is that once we start the review, that we continue it until we're completed. Would there be any objection to breaking for lunch now? It's 11:30 Eastern Time. And we could do lunch, and then we can reconvene at 12:15. George what do you think of that as an option? Because I don't want to break up the review.
George Alan Smith:	Yeah, it's perfectly fine, whatever makes you all comfortable. It doesn't matter what time lunch happens. It's up to you all. So if you're comfortable with right now and come back at 12:15 did you say?
Bob Shireman:	Yeah.
Claude Pressnell:	Yeah, it'd be at least a 45-minute break.

Speaker 5:	Great.
Claude Pressnell:	Does this sound reasonable? [crosstalk 02:22:14].
Speaker 5:	Thank you.
George Alan Smith:	All right, all right.
Claude Pressnell:	Okay.
George Alan Smith:	Bye, bye, you all.
Claude Pressnell:	Without objection, then we will stay in the room for 45 minutes.
Speaker 5:	Okay, great.
Kathleen Alioto:	Well, it'll give me time to try to send this off.
Claude Pressnell:	Yeah, you can.
Claude Pressnell:	(silence)
	All right, welcome back everybody. My name is Claude Pressnell. I serve as the president of the Tennessee Independent Colleges and Universities.
Speaker 6:	Hold on just one second. I'm sorry. We're getting bad feedback. Hold on one second.
Claude Pressnell:	Make sure, again, that you're muted unless you're going to speak. Welcome back Jennifer.
Speaker 6:	All right. Is that better? Do we have to feedback on? All right, sounds like we're good.
Claude Pressnell:	Sounds good. Okay. Again, welcome back to the afternoon session of the [NACIQI 03:12:33], or for some of you it's still in the morning. But nevertheless, welcome back. I'm Claude Pressnell with the Tennessee Independent Colleges and Universities, a member of the committee, and serve as Vice Chair.
	And just as a reminder, [Art Keiser 03:12:46] recused himself from this review. Therefore, I'm going to take it over at this point.
	This is renewal recognition for the Accrediting Commission of Career Schools and Colleges, ACCSC. Our primary readers are Kathleen and David. And department staff is Reha Mallory.

According to my notes, we have four agency representatives who will be joining us in just a few minutes. And we have five third party commentors on this case.

For those who are offering third party comments, I just want to remind you that you'll be limited to three minutes. And so, if you're considering your remarks through the first part of this review, you might just keep that in mind.

So let me turn it over to either Kathleen or David to do the agency introduction.

Kathleen Alioto: Good afternoon. I'm Kathleen Alioto. The Accrediting Commission of Career Schools and Colleges, ACCSC, is an institutional accrediting agency that accredits 685 institutions located throughout the United States, Puerto Rico, and the District of Columbia.

The agency's accredited schools offer certificates, academic associate degrees, occupational associate degrees, baccalaureate degrees, and master's degrees, and distance education programs, predominantly in occupational trade and technical career areas.

Most of the agency's accredited schools participate in the department's Federal Student Aid program. As the title or gatekeeper for its accredited institutions, it must meet the separate and independent requirements of the secretary's criteria.

Claude Pressnell: All right, great. Reha, over to you?

Reha Mallory: Good afternoon Mr. Chairman and members of the committee. My name is Reha Mallory, and I'm providing a summary of the review of the petition for renewal recognition for the agency, Accrediting Commission of Career Schools and Colleges, or ACCSC.

The staff recommendation, excuse me, to the department official for this agency is to renew the agency's recognition for a period of five years. This recommendation is based on the review of the agency's petition and supporting documentation in addition to an observed commission meeting in August 2020, a file review in October 2020, and a virtual visit in December 2020.

The department did not receive any complaints, and there were no third party comments during this recognition period.

Our review of the agency's petition found that the agency is in compliance with the secretary's criteria for recognition. Therefore, as I stated earlier, the staff is recommending to the senior department officials to renew the agency's recognition for a period of five years. Representatives from the agency are here to respond to your questions. Thank you.

Claude Pressnell:	All right. [inaudible 03:16:14], we're getting quite a bit of feedback. Is everybody hearing this? Okay, there we go. I think we just... All right, so any questions, Kathleen? Or David, any questions for Reha before we continue on?
	Kathleen, you're muted.
Kathleen Alioto:	Okay. All right. Reha, I'm wondering when you gave your recommendation and when the department concurred with your recommendation, if you had looked into any of the resources that the department has provided to the committee in the... Cites institutional performance by creditor. Because if we look-
Reha Mallory:	Yes. We've... I'm sorry?
Kathleen Alioto:	Because I have some questions about a number of them, so perhaps I could ask, and then you can answer in terms of that.
Reha Mallory:	Yeah, sure.
Kathleen Alioto:	One of the things that I was concerned with is that ACCSC accredits a number of institutions that receive millions of dollars from the federal government, including the top 10 which you can find in the breakdown. The top 10 with Full Sail University, a for-profit with 18,500 students getting $693 million a year in Title IV loans and grants from the federal government. It has Steven [Pennage 03:18:29] getting, with 10,800 students, 389 million. Miller-Motte with 13,000 students, 235 million. Lincoln College with 8,000 students, $187 million. Universal Tech with 6,000 students, getting $176 million. Let's see. Alabama Agricultural... Sorry. Getting 161 million. Universal Tech with 4,000 students, getting 133 million. Remington College with 5,000 students, getting 121 million. And Universal Tech with 4,000 students, getting 100 million dollars in federal funding a year. The list goes on, including some real doozies, [Wayacook 03:19:53] College with 38 students, getting $9 million. Las Vegas College with 97 students, getting $6 million. And Acupuncture and Massage College with 32 students... Let's see how much money that they get from the federal government each year.
	All of these schools have been accredited by ACCSC. And my question to the department is what kind of watchdog are you with an institution, Full Sail University, getting $693 million and being accredited by ACCSC?
	Then if you look through the other documents that I sent, the 90-10 requirement is just skirted. It's being just skirted by a number of the colleges that we have decided.
	Then we have the short and medium debt with [inaudible 03:21:26] adapted students end up with. It's often more than the tuition, but it's something that without having the kind of jobs that would pay for this debt, strangled by this for probably much of their lives.

	And then we have the federal government even giving loans to parents, and the parents ending up in debt. So [crosstalk 03:22:07].
Claude Pressnell:	Kathleen, your question is whether or not they take those documentations into account when they're doing their review? Is that correct?
Kathleen Alioto:	Yes.
Claude Pressnell:	Okay. Looking at the 90-10 rule, the amount of money that institutions received based on ratios, and then looking at student debt as well, right?
Kathleen Alioto:	Yes.
Claude Pressnell:	I'm just trying to see if we could give Reha an opportunity to respond before it gets too weedy. And I know Herman wants to respond as well in terms their scope of work. So Reha, first to you since the question was directed to you. And then Herman, after Reha. And then we can come back to this, Kathleen.
Kathleen Alioto:	Okay. And then after that, if David can testify in terms of student performance, which is directly related to the criteria.
Claude Pressnell:	Okay. Thanks. Reha?
Reha Mallory:	Yeah. Thank you for that question, Kathleen. To answer the first part of your question related to what the department looks at, we do review FSA or student financial aid data in our review. But as you know, and I know that you're very thorough in your review as well, but for our analysis we look strictly at the secretary's criteria. And so that information, our analysis is based solely on the secretary's analysis. Also, states have the option to oversee the licensure of their institutions as well. And so there is some additional oversight that is independent of our office, and beyond the scope of what we are doing. Again, we look strictly at the secretary's criteria. And I'll defer to Herman for additional information.
Speaker 7:	... for you. And I'll default to Herman for Reha [Stalt's 03:24:00] information.
Claude Pressnell:	Yeah. Herman?
Herman Bounds:	Yeah, thanks. So I think Reha said it well. Our review is strictly related to the Secretary's criteria for recognition. That governs what we do. Also, what governs what we do is the Higher Education Act. And if you look into Higher Education Act in paragraph G, you have to remember the limitation on the

Secretary's scope when it comes to student achievement in those things. The Secretary's not permitted to set any of those student achievement standards. So we have to ensure that the accrediting agency is following whatever standards that it has. We also look to see what sorts of research or evaluative measures that an accrediting agency uses to determine what those standards would be. And in this cases, the ACCSC, they conducted such a review, I think, and discussed that in at a previous [seeking 03:25:05] meeting.

Claude, I'm glad you brought some things up. My intent for all those things are not governed by the accreditation group or what we do. The Office of Federal Student Aid has a role with determining Title IV eligibility and all the requirements. I'll [stick 03:25:24] with that. I know Donna's probably listening in. And she may have some more information on those types of things. But all that information, while it may be helpful, is really outside of the scope of all of you.

Kathleen Alioto: I understand that. But I'm wondering... This is not... Am I on mute? Am I talking to myself here?

Claude Pressnell: No. We hear you. Go ahead, Kathleen.

Kathleen Alioto: I am wondering... I see this in a question of the Department. Is nobody going with someone that's [inaudible 03:26:06] stuff?

Speaker 8:   Well, I think there again-

Kathleen Alioto: [crosstalk 03:26:11] we're supposed to be saying that we're going to accredit an agency and the agency give a green light to an agency that's overseeing it. They're overseeing what's going on in these institutions. And yet you can't tell me that an institution is making the kind of money that they're making. There's not a problem there.

Speaker 8:   Well, I'm just saying that the things you brought up, Kathleen, are outside-

Kathleen Alioto: [crosstalk 03:26:45]

Speaker 8:   They're outside of the scope of our review. We don't determine how much federal student aid can go out. That's governed by the Office of Federal Student Aid. Evaluations of the [inaudible 03:26:58] rule. Those things are outside of our purview when it comes to the recognition of accrediting agency. Congress set forth the laws in the Higher Education Act. And the Department negotiated rule making for what's required of their criteria. All these things that... information that's contained in the Scorecard or information that's contained in other documentation is just outside of our review. If the Department sees fit that they want to include that, then that would require new rule making. And maybe even re-authorization of the HEA. So I also know those things would be evaluated by us when we conduct a review of an accrediting agency. Right now, we are

bound by... we're just bound by certain regulator practices and also statutory practices.

Kathleen Alioto: And also by the Department's interpretation of what the law is. Okay, Dave?

Claude Pressnell: Let me make a comment. And then we'll go to David and see if you have any questions. I think we've had the dashboard before. And the dashboard, it needs to be [inaudible 03:28:20] context. It doesn't necessarily provide us [inaudible 03:28:24]. So back to Herman's comment is that we have a very defined scope of work. And it's all in 602. So where as it may define it's context... To ask a specific question, there has to be a direct correlation to a violation of a statute. So I just want to remind everybody of that. So it's context, not necessarily... It might be helpful to do a crosswalk between what we see in the dashboard as to what we have authority over as the body and the [seeke 03:28:55]. But there's not a lot in there, again. [inaudible 03:29:01]. David, do you have any questions before we do open it up to other [inaudible 03:29:04] that have questions for the staff on the review?

David Eubanks: Just briefly. Kathleen covered most of it. I think I'm in a similar uncomfortable position with having a bunch of new rich data. And trying to figure out how that integrates with the voluminous report to the reply process that the Department has documented amply for us. And I think part of it comes down to where do value judgements lie? I think we saw an example within the last year of making a decision that an accreditor's finances were insufficient to support its own governing activities. So that would be an example. If that's true, it would be an example of using data to make a value judgment that can affect recognition.

                    What I'm hearing is that those kind of value judgements don't happen with respect to the distribution of institutional success. So let me just ask, is it true that if an accreditor suffered an event where a bunch of schools just suddenly shuttered and students were left hanging with nobody knowing, that that would not be a data point considered in their recognition?

Claude Pressnell: Herman, do you want to answer that?

Speaker 9:   I'll [inaudible 03:30:34] to Herman for this question, just as a Director, to give you kind of a broad [inaudible 03:30:41] we do as an office.

Herman Bounds: Sure. That would be something that we would look at. There are other criteria that kind of speaks to a specific disclosure of schools. Some of those just happen without anybody's fault. The folks show up and an institution is suddenly closed. That institution may not have been under any sanctions by the accrediting agency. But those are things that we look at. What were the status of the students prior to the close. Did the accreditor have the school on some sort of probationary action or some heightened observation action? And where were they at in that process?

And then we would also evaluate, so what does the accreditor do once these closures start? If there are a ton of those, are there adequate teach out plans. There are whole... there are several things that we would evaluate to see how well the accreditor performs. But we've seen in the past, in many cases, schools, they just close. And of course, then we want to see what the accreditor does after that closure. Because frankly, once a school closes, the accreditor really doesn't have a lot of things they can do. They can't sanction the school anymore. So we now have to see what they do to take care of those students.

But the short answer to answer your question is, yeah. That would be something that we would look at and we would determine if there's something that the accreditor could have done prior to those things happening. So, yeah. That would be an occurrence that we would take a look at.

Claude Pressnell: [crosstalk 03:32:36]

Speaker 8:   Thank you for that. Thank you for the answer, Herman. That helps. And so, I just want to suggest that there might be ways to incorporate this kind of data within the rules and within the Higher Education Act that aren't heavy handed. But can contribute to back and forth dialogue between the Department and the agency that would help us in turn. So I'll stop with that.

Claude Pressnell: All right. And Kathleen, you were first. And then Bob and Mary.

Kathleen Alioto: In regards to the [inaudible 03:33:19] potential school closing, in the report, the agency says that out of their... it says succeeding five schools. But then in the report, it actually adds that to 918 schools. And of that, 118 initial accreditation, 418 renewal accreditation. And then 346 deferred, on warning, or probation. So you're not talking about a few schools. You're talking about 217 deferred, 66 schools on warning, 63 schools on probation, and 46 schools that were denied. So it's 346 schools were deferred, on warning, or on probation. Does that map wave a red flag in our faces?

Claude Pressnell: Okay. I tell you what. I think we're getting out ahead of ourselves on the discussion. And so, I want to kind of want to pull us back. Right now, we're supposed to just be asking clarifying questions of the staff. And I understand that there might be some more complex arguments, of which we want to hear all of it. But I think we're in the wrong spot right now. I think that what we need to do, we've only had the interjection of the agency. We've only had the staff talk briefly about the review. These are supposed to be clarifying questions about it. And I think, Kathleen, you've had some clarifying questions at the beginning. We need to give an opportunity for the agency to provide some comments. Then we've got... Then we can enter into some robust conversation. Because Kathleen, I think a lot of your questions need to go to the agency, too. And so there's going to be dialogue going back and forth.

So let me just kind of restrict this to clarifying questions about the review. There were some clarifying questions as to how data that we now have in the dashboard might provide and inform the evaluation. I think Herman's made it clear that it provides context, but it doesn't provide authority within the criteria for which we're supposed to review the [inaudible 03:35:56]. So are there any other clarifying questions? Because I know we're going to get into some big dialogue. But I'm also... The agency's sitting here waiting to make some comments. And I want to respect the order of service on this. So Bob, again, do you have a clarifying question on [crosstalk 03:36:16]?

Bob Shireman: I do have a question for Reha, yes.

Claude Pressnell: Okay. Thanks.

Bob Shireman: A comment. And I think I want to kind of agree with both you and Kathleen on the way you're approaching this. I think Kathleen is right to ask about the accreditation group, staff, and the information they take into consideration because it really helps to inform us about what we should be looking at. And knowing whether they looked at those sorts of things. And I think, Claude, that you made earlier about it providing context. And you used the word crosswalk, which I thought was a really useful point that part of the importance of looking at, not just the criteria and things that relate directly with criteria, but to look more broadly. And say, "Do we see anything... Is there anything smells? Is there anything that seems problematic that would cause us to look more closely at the criteria themselves?"

So in that regard, I wanted to ask Reha whether... I know that the accreditation group looks at agency finances, looks at the qualifications of the pre-missions that the board members... One source of information about finances and board members are the public IRS form 990 tax forms that non-profits like ACCSC provide and are available widely. So Reha, can you tell us whether the staff reviews those form 990s from the IRS when dealing with the agency?

Claude Pressnell: Yeah, Reha?

Reha Mallory: Yes. Sorry. I was on mute. So Bob, we don't review that level of external information. We do look at the agency's website, and of course the information that is submitted. But we don't, if you will, scour the web for all information that is available. So we do, again... And Herman mentioned this before. We do pretty much keep our review within the context of the criteria. So to that end, in short, no we do not.

Bob Shireman: Thank you. I am, I think, in agreement with Kathleen's concern that the department's can approach to doing its research is dangerously myopic. And in looking at an agency's... their tax return that they submit to the IRS, that is a formal, an official document available, is not just scouring the web. It's not a matter of Googling. Although I think the agency... I think the staff should do

some Googling of agencies and of some of the institutions to see if there are interesting things that pop up. But a tax form is a basic non-profit corporation informational document. And if a staff had reviewed ACCSC's form 990 filed with the IRS, we would know... the department would know that the public members of the commission are paid $10,000 to $12,000 a year for their participation as a so called public member of the commission.

Now, I understand that if the department... that may or may not be a violation under the department rules. But certainly, I think it points to a lack of seriousness on the part of ACCSC toward the public member requirement. One of the public members is a regulatory consultant who serves as a public member for multiple agencies, essentially seems to have a career of being paid as a public member of commissions. Which I don't think that's what we intended. It may be a violation of the spirit rather than the letter of the rule, but I think it gives us reason to look more deeply at qualifications of board members more generally. And probably other issues as well.

Claude Pressnell: Okay. Before we go on to Mary Ellen-

Kathleen Alioto: Bob, I do-

Claude Pressnell: Well, let me just say one thing. I think the issues that are being raised here are critically important. And I think, Kathleen, you've made some excellent observations. I think, Bob, you are as well. If I could ask that actually these be put... keep your questions. At the very end of our seeking meeting, we're going to talk about policy issues, which are things that should be informing us. And also, what are some outside information that can give us better [inaudible 03:41:37]. I think that is a better place for these discussions. I think that they're becoming known here. But the reality is that we're going to review the agency based on our scope of authority that we have now. And if we think that the staff need to start looking at tax forms and things like that, those are recommendations that we can bring for sure.

But I think that those would be things that we need to talk about during the policy discussion at the very end. And I realize that there may be some objections to that. But right now, we're asking them to do things that are currently not within their scope of authority. Or we've been discussing work that's defined by the statute. So Mary Ellen, you had a comment?

Mary Ellen Petrisko: [inaudible 03:42:32] to better serve [inaudible 03:42:36] and the regulations. [inaudible 03:42:44]

Speaker 10:   We're having a hard time hearing you, Mary Ellen.

Mary Ellen Petrisko: Thank you.

Claude Pressnell:	Let me... Okay. So you're going to defer until the policy discussion? Is that what you said, Mary Ellen?
	I'll come back to her if we need to. Jennifer?
Mary Ellen Petrisko:	Oh, I'm sorry. I said I did have a question, a clarification. It seems [inaudible 03:43:13] change [inaudible 03:43:13], so I will ask it at the end. I will ask at the end. [inaudible 03:43:15]
Claude Pressnell:	Okay. Thank you. Jennifer. You're muted.
Jennifer Blum:	Sorry. I'll defer, too. Except for that I will say... And Claude, I largely agree with you. Except for when we're making decisions about this accrediting agency, and for other ones in the next... as you say, end of the meeting. I do think for decision making purposes before that, there is some relevance here to understanding where our guardrails are. So I do... I am flirting with idea of asking Donna Mangold here, from the legal perspective, to help us out a little bit. Obviously, we're just an advisory committee and we can do whatever. Obviously at the end of the day, we can take whatever vote we want on whatever, I guess, basis of information. But I just want to clarify something that Herman said earlier. Our, sort of, purpose and role here is also like the department to follow the recognition criteria. So that's the first question. I just wanted to confirm that.

And then secondly, from a consistency standpoint, I spent the last meeting talking a lot about consistency. To the extent that we are asking the department or ourselves to do things that we haven't done on a regular basis with other agencies, I would raise concerns about consistency. And so, Claude, I'll have a whole bunch of other questions at the end. But I do think it's appropriate to ask going into this agency and having to make a decision on this agency and others during this week on having to wait until the end on just understanding our, just a clarification of, our role being similar to the department's in that what we're looking at, whether an agency meet criteria or whether they're good or bad, they are what we're dealt with. Is that correct? And I don't know if that's Herman or Donna. I kind of like the idea of having the legal perspective here. |
| Claude Pressnell: | Yeah. If I could respond first and then we can cue up whoever. Donna, I'm trying to honor the flow of the meeting, of this particular review. And we... There are a lot of questions being asked that should be asked, but not at this particular point. After the agency has an opportunity to present themselves, then I think it's open game. Ask whatever you want about anything you want. Have at it. But I'm just trying to get to the next point on the agenda so that we can be better informed about what questions you're trying to ask. So this was the point where we're just asking very specific clarifying questions of the department on the review. We're not [inaudible 03:46:04] on that yet. Now... So we have... I expect to hear a whole lot as soon as the agency has an opportunity to present themselves. And you should be asking all these questions. |

But I also believe that there's going to be value in keeping some of these questions and repeating them at the very end on Wednesday. Because that's our policy piece. In other words, if we want to say, "Hey, we think that the department ought to expand its scope on financial review. We think that the dashboards need to be taken into deeper consideration of our review." Those are all things that are really good later, that apply not just to this accreditor, but also all accreditors. So I see a blend here. So Jennifer, I sense that I misstated myself. I didn't mean that I don't want you to ask questions. Because I do want you to ask questions. I'm just trying to get to the next point that allows the agency to present themselves, so we can move on from there. But I'll defer to legal because legal has a comment on this.

Or George or Herman, either one.

Herman Bounds: I guess Donna may come on in a moment to talk. But I just wanted to reiterate what the staff's role is and what our legal boundaries are. Or where the [inaudible 03:47:28] are. And for us to find an agency noncompliant, I have to say they're noncompliant with 602.18, 602.22, or 602.23. And why? So I just wanted to reiterate that point.

I also wanted to bounce back to something that Bob said with the review of financial statements audited fiscal reports. And I also wanted to remind everybody, too, that we published an accreditation handbook. And that handbook tells agencies exactly what they have to put in the petition for recognition and exactly what information that we look for. And that handbook also guides agencies, which is developed by the previous administration. So there is information out there that tells them what we would like to see when they submit their petition. That's it from me. I just wanted to chime in.

Claude Pressnell: All right. Very good. Let's allow the agency representatives to provide some comments. And I have got... I can see there are four individuals here before us. So I'm going to defer to Director McComis, the Executive Director to introduce who is representing the agency.

Michale McComis: Thank you, Claude. I'm going to turn it over to Jennifer Bergeron, the Chair of our Commission. And she's going to kick us off. And then we'll go through introductions as well. Thank you.

Jennifer Bergeron: Thank you very much. Good afternoon, everyone. And thank you for the opportunity to be with you here today. As Dr. McComis said, my name is Jen Bergeron and I proudly serve as the Chair of the Accrediting Commission of Careers Schools and Colleges. Joining is me Dr. Mike McComis, the Executive Director of ACCSC. To my far left is Karen Marcinski, the Director of Member Services with ACCSC. And to my immediate right is Joanne Wenzel, who is the Vice Chair of ACCSC and the public member of the commission. Joanne did work in various capacities for the California State oversight agency for private postsecondary schools. She retired in 2017 as the Bureau Chief of the California BTPE.

As I prepared for today's meeting, I asked myself time and time again what I might share with you about our agency that you haven't already taken away from our petition. I know you've reviewed the final staff report recommending ACCSC's recognition for five years with no issues or problems cited. As it relates to established department criteria, we've demonstrated compliance through the process to date. With all of this in mind, a very familiar question continued to come to the forefront that I'll share with you. And that is, how will this impact students? I hear it again and again during the decision making process related to accreditation from commissioners, from staff, from member schools. It's at the core of what we do and who we are. Students are our mission. And ensuring quality education that enhances their success in the workforce, that's why we exist. Every commissioner subscribes wholeheartedly to this mission.

As we apply the standards of accreditation, it serves as the north star for everything we do. How will this action, what we choose to do or don't do, impact students, their learning experience, and associated success, their career goals, their lives? On behalf of my fellow commissioners, our 30 ACCSC team members, our 125 volunteers, and most importantly, our students, I want to thank the members of this committee for your time and your dedication to this process. I would also like to take a quick moment to thank Dr. Stephanie McKissic for the thorough analysis of ACCSC's petition. We appreciate your thoughtful engagement during the review period, which included observing a virtual commission meeting. At this time, I would like to turn things over to our Executive Director, Dr. McComis. Thank you.

Michale McComis: Thank you, Jen. Good afternoon, and good morning to some. I don't think I could say anything more or better than what Jen has already shared through her opening comments. But what I will say is I've been with the agency for 26 years, and this is my fourth appearance in front of [NACIQI 03:52:23] in relation to our petition for recognition. And over that time, several things have changed. The makeup, the composition of the committee, statutes, laws, regulations, interpretations have changed over the many years that I have served in this capacity. But one thing has not. And to piggy back on what Jen said and that is our commitment to our mission. And as a by product of that, we take our recognition with the Department of Education and the sense of responsibility that comes along with being a recognized agency, a reliable authority on educational quality, we take that very seriously.

And when we talk about the importance of our results of this petition, the petition before it, and the petition before that when we've had no findings of noncompliance with federal regulations. We take that very seriously. We don't take it seriously just for the sake of compliance. We agree with the important oversight role that the department plays in this regard. We support it. We are avid members, contributors to the triad. We see the department in a partnership capacity. The same way that we see our state partners as well. We participate in it. And we hope to do so in the future.

Now many of the questions and comments that I've heard thus far today will probably lead to policy conversations tomorrow, and the next day, and for years to come. We hope to be part of that conversation as we have been many, many times in the past. It is our intent to continue to try to contribute to improving this process and the opportunities for students that come from it. So with that, I'll say an additional thank you to Herman and to Stephanie for continued support through a very thorough review process. Again, one that we appreciate and one that we always learn from. And I want to thank the members of NACIQI, as well, for taking the time to go through, review our materials, and to give us this opportunity to answer any questions that you may have. So with that, I'll turn it back over to Claude. And I'll be happy to answer any questions that you have with many members of our panel.

Claude Pressnell: All right. Well, thank you very much. All right. So I'll turn it to Kathleen and David. Do you have questions that you might have? Kathleen, you want to start?

Kathleen Alioto: Yeah. I'll ask you the question that I had brought up, perhaps inappropriately with the department, i.e. Claude. And that is, I found that there was some kind of a mix up about members. And I don't know if it's because of the data being arranged in different ways or whatever. But you said that you had 685 schools. But then in the report, there are actually 918 schools. But of those, 346 are deferred, on warning, or probation. And in that that's said, depending on which numbers you're using, we start with 685, you're listing 918 and we're talking about money going out to a number of these, what is that you're doing in regards to 1/3 or 1/4 of your schools being in bad shape.

Michale McComis: Well, certainly. Let me provide some clarity to this. I'm not sure where the 918 number comes from precisely. But what I can tell you is we currently accredit 565 institutions. That includes main schools and branch campuses. We don't break them out the way the department does by OBE ID number. We require every institution to go through an accreditation process, whether it's a main school or a branch campus. And our branch campuses are essentially additional locations for the department.

But the other numbers that you're citing are taken, actually, over a three year period of time. Fiscal years, '16 to '19. And what we're trying to do there is to give an idea about the numbers of the types of actions. And some of those might be repeat actions for a single institution over a three year period of time. They may have been deferred two times. But the intent of providing those numbers was not to, as you say, to indicated that they're in bad shape. But instead, demonstrate the robust monitoring process that we use in going through the accreditation process. And so, it's not that at any given time that half, or a quarter, or...

Michale McComis: Not that at any given time, a half, or a quarter or a third of our institutions are on warning or probation or deferred. It's just that was the total number of actions taken across all institutions over a three-year period of time. So that just

provides some clarity with regard to the specific numbers that each cited. And so I'll stop there and just see if that answers the question that you had.

Kathleen Alioto: I got those numbers from your report. That's where those numbers came from. I didn't-

Michale McComis: No, I understand that. Yes, and we saw the 346 and the 216 numbers. I just wasn't sure where the 918 number came from. But yes, I understand. And we were able to pinpoint exactly. And that's why I wanted to point out to you that at the very beginning of that sentence, it clarifies that that came from fiscal years '16 through '19 for the total number of actions taken for all institutions across a three-year period of time. It doesn't mean that at any given time, a half or a quarter or a third of the members are in that particular status, if that clarifies it.

Kathleen Alioto: Okay. So you also denied accreditation to 36 schools, and one of the things that you did not include in your report, but which has been in the press, is the number of schools that either you or other agencies have closed or been closed. And I wondered what the number of schools that is.

Michale McComis: [inaudible 03:59:51] Go ahead, Karen.

Karen Macinski: So hello. ACCSC publishes school closures on our website and the status of their accreditation at the time of closure, so you can take a look at that. But it's about 25 in the last 12 months, including additional locations and satellites and things like that.

Kathleen Alioto: Okay. Now one of the schools that you had presented to us in the documents was a school in Puerto Rico. Let's see... Beautech Express Academy. I thought it was kind of curious that that was included in your presentation. Although I guess it is what your team does when they went to Puerto Rico from February 28th to March 1st and found that there was actually an enrollment... students, with only three being available as security officers. And I was curious about why would other schools that are dealing with your policies in regards to what should stay open and what should stay closed that you presented Beautech to us.

Michale McComis: Well, I believe that the intent of providing that institution was to give a cradle-to-grave example of an institution that had gone through an initial accreditation process and had been denied initial accreditation. So the incentive of using that was because it provided the context, the demonstration of the application of standards, the demonstration and the application of eligibility criteria for the institution, and largely, I think, demonstrated how the agency goes about applying those criteria for an institution.

Kathleen Alioto: Okay. And you say that 78% of your schools have an average of... I don't have it... like [inaudible 04:02:23]. But it about 240 or 250 students, correct? Seventy-eight percent of your schools?

Michale McComis: I mean, if you've taken that out of our petition, that sounds about right. The majority of our institutions have 300 students or less.

Kathleen Alioto: Yeah. Sorry that I don't have the exact... But the schools that I had talked about earlier were much larger than that, so I'm not sure what my point was on that.

Michale McComis: Well, Kathleen, I think I can... if I can interrupt? We're trying to answer part of that question while you're looking through your notes.

Kathleen Alioto: Right.

Michale McComis: From what I understood, some of the campuses that you were referring to don't represent a single campus, but instead all campuses operating under a single OPE ID number. So that could represent, I don't know, 10, 15 campuses. I really don't know. But those enrollment numbers that you were citing, I think represent total enrollment for all institutions operating under that one OPE ID number. So I don't think that in the majority of those cases, I believe, that would have been the case.

Kathleen Alioto: Okay. Can tell me if you... I know that the department is saying in terms of its criteria that they are not asking you to deal with the student loan scandal, but I wonder what do you do with the school like [WyoTech 04:04:24] that has 38 students and student loans of $9 million? How do you help a school such as WyoTech or Las Vegas Community College or the Acupuncture and Massage College? How do you help them to make sure that their students are following the criteria that you have suggested quite eloquently in your petition?

Michale McComis: If I could please clarify, do you mean specifically with regard to student loan obligations with that institution?

Kathleen Alioto: Yes.

Michale McComis: So we have a section of our standards that does speak to an institution's responsibility to have a default management plan and to ensure that students know about the responsibilities to repay student loans and are fully informed of all those requirements. We are not in a position to enforce federal regulation or federal policy with that regard.

What I can say in addition is the department has specific criteria for when an institution starts to get in trouble around default rates. And we have a committee that is comprised of board members that looks at default rates in advance of coming... before those numbers are tripped. Right? So what we're trying to do is an early warning, say, "Well, if an institution is going to get in

trouble when they're at 30%, we want to know about that in advance and start monitoring that earlier." So we have a protocol and a monitoring mechanism that actually is a bit, like I say, early warning system that puts that on our radar. And then we go to the institution and we ask for additional information about what is your default management plan, how's that working? Can you talk to us about whether or not you're seeing improvement with regard to repayment and how well students are informed about their responsibilities? Again, how is the institution supporting those students in that regard?

Kathleen Alioto: And of the 382 schools that are deferred or warning on probation, how many of them are in that category in terms of loan default problems?

Michale McComis: So I want to go back and clarify that it isn't an indication that there are 346 schools on probation at any given time. That was just the number of actions taken over a three-year period of time. And I don't have any correlated data at my fingertip to tell you whether or not there is some relationship between warning actions and loan default. Although anecdotally, I can say it from my years of experience and that is not a common citation with regard to what we see frequently.

Kathleen Alioto: Thank you. I think my colleagues have other questions.

Claude Pressnell: David, first, do you have any questions as a reader for [Mary Lou?]?

David Eubanks: Yes, I have a series of linked questions, if you don't mind, Claude.

Claude Pressnell: Sure.

David Eubanks: First, thank you [inaudible 04:08:16]. I particularly appreciated Jen's remarks about the importance of the fates of students who enter our institutions and make their ways through them and after them. Also by coincidence because of the student achievement project, I had reviewed a whole bunch of reports and self-studies from ACCSC. And so I had sort of an immersion in the usefulness of having specialty accreditors. Particularly appreciated the role of program advisory committees, which was new to me, which seemed to be from my reading of the evidence, seemed to be a useful mechanism by which a program can get feedback from industry and other sources.

                       So I wanted to focus a series of questions about student achievement, and maybe to frame that, see if we have agreement on what it means for a student to have a bad outcome. So if we imagine a hypothetical student who has read the literature on a program, gets excited about it, applies, finds the money, takes out a loan, and gets a federal grant, and then doesn't complete for some reason and has debt, can we all agree that that's a poor outcome?

Claude Pressnell: I'm sorry, is that a question for us?

David Eubanks:	Yes.
Claude Pressnell:	Well, based upon our reporting mechanism, that would be a student that would not be considered a graduate.
David Eubanks:	Okay. I guess I'm looking for something more philosophical than that. I see my role on this committee is to try to get to common sense understanding of how this huge bureaucracy works and what its outcomes are for real people. So let me make it a little more concrete. If the bachelor's degree institution has a graduation rate or a completion rate of around 30-some percent, meaning 70% are not completing, and many of those that have loan debt and so forth... In the aggregate, to me that seems like the system isn't quite working. Would you like to comment now?
Karen Marcinski:	I can comment, David, a little bit on your first question. When I think about our member school and the efforts of those schools as it pertains to assessment and improvement around student achievement outcomes, we would all agree that a student who commits time, money, and resources to start school and not finish is not the ideal outcome. And that's why ACCSC... I think you saw in the petition, you made reference to this as part of your student success research there, we've got a very defined standards-benchmarks in place to hold schools accountable for supporting student success.
	When we think about is it a bad outcome, that's a broad generalization. I do think some students start school and don't finish for a number of different reasons, not always associated to educational quality, as we know. There are sometimes personal circumstances, illness, and other factors that play into that.
	Our goal is to always work with students as much as possible. And we challenge our member institutions to do that as well. There's the possibility of students returning to school and finishing up their program depending on the myriad of circumstances that might lead to a student starting and not finishing.
	So not an ideal outcome. Is it bad? I think it depends on the circumstances and the final outcome of whether the student is able to return, finish their program, and looking holistically at the institution to make a determination around how they're supporting students success holistically, relative to those benchmarks that I reference there.
Michale McComis:	And I would just add to that I've been before the CT on a couple of occasions. I've provided training and a conversation in the past about the metrics that ACCSC uses. And it goes back to also the comment that Kathleen made about deferrals and other actions.
	There is a very robust monitoring process that goes in play to try to understand those factors. And I'm an advocate for systems that take a mixed-methods approach, both a quantitative and qualitative review process to better

understand contextually the meaning of the data. And there's been a lot of talk here today about data points, but much of it is without context and much of it is limited.

So we try to use our process to understand just those kinds of issues so that when making important subjective decisions about accreditation, it's not relied upon just one data point, but instead an opportunity, and a robust opportunity, for institutions to talk about where they are succeeding, where they're not, and what they're doing to try to improve those outcomes.

David Eubanks: Thank you. And I have a couple of specific questions about those means and the second... But first, let me just comment that I think nationally there's good research to support the idea that educational outcomes have intergenerational effects that are quite profound and that I'm not quite so casual about a student who drops out of a debt. I think it's a disaster probably for most students.

But let me turn to a specific thing. So we have these data points and it's great, but it's also overwhelming. And it's hard to know what to do with those. But let me focus on one of the standards. I don't have the number in front of me, but it's about recruitment of students. And I admire the language you have in your standard because it's very clear. I'll read what was from the narrative. It says, "Schools must describe themselves accurately to prospective students and follow practices that allow prospective students to make an informed and considered decision about undue pressure on whether to enroll."

And then it goes on to say that, "A school's recruitment's efforts to attract students should try to attract students who are qualified and likely to complete and benefit from the training." So this is a very laudable philosophy, and it's got two moving pieces that institutions have control over. And I would think that as an accreditor, you could encourage them.

One is to have the schools describe themselves accurately. And you actually have a checklist, I understand, and it's great, where schools go through and say, "Yes, we told them about tuition," and so forth. So part of that, then, points to the student; is a student making a good decision based on information? And then the second moving part of it is the school's admissions requirements where they can reduce the number of students admitted by using predictive methods to figure out who's likely to succeed. So if both of those pieces are working, it seems like we would not see graduation rates as low as 30% or even 40%.

So my question is, is it that the students are not informed, or are they just making decisions that aren't very good? Or am I misunderstanding it?

Michale McComis: Well, I suppose it could be a number of factors. If you're correlating that every student that doesn't complete a program, and that poor outcome is linked directly to these two criteria that you're looking at, or these two factors, then

that doesn't really take into account the fact that students don't complete for a whole host of reasons that may have nothing to do with informed decision-making at the beginning of the program.

My experience is that more likely students don't complete programs because of the things that happen and the barriers that present themselves to that completion during their time at institution. And in fact, that's what our research demonstrates, is that the strongest relationship that we see in the data between graduation rates is length of program. And that's why the metrics that we have, benchmarks that we have, are tied to program length.

Now having said that, that doesn't mean that that's not an important area of inquiry. So again, through our monitoring processes, it is quite common for the commissioners to ask for, when monitoring an institution's graduation rate, for example, to ask for additional information about recruitment practices, admissions policies, advertising, things of that nature as a continuing assessment as to whether or not they are really using those standards and their own policies and practices in a way that supports successful student achievement.

David Eubanks: Okay, thank you. The ability of institutions to predict how well students will perform, like retention and graduation rates, has increased dramatically in the last 10 to 15 years. And so I think if an institution is serious about it, they would be able to increase graduation rates pretty quickly if they wanted to. I think the problem is, and I'll throw this out as a question, is there a financial incentive for institutions not to say things like, "Well, yes, you can get a certificate from us, but you could go to the community college and get it half-price." That would be full transparency. Is there a financial incentive not to say that? And is there a financial incentive to perhaps recruit students who are less likely to complete, just because we need to keep the lights on and pay salaries?

Michale McComis: Well, I really can't speak to your first comment, but what I can say about your second comment, and what I've seen employed through this commission over the years, is that that is not an excuse for poor outcomes. And so in a situation that continually demonstrates poor outcomes is going to be having to answer for those outcomes. And the ultimate action that the commission may take is revoking accreditation. So that is not a very good long-term strategy or even a short-term strategy if your intent is to continue to offer education.

So that's one of the things that we're looking at is whether or not over a period of time, institutions are able to demonstrate that they are, in fact, serving students successfully.

David Eubanks: So how does your review team know... you got a checklist for informing students, which I admire. It's got lots of great stuff on there. I thought I had it, but I don't. What I didn't see on there, however, was some sort of estimation of informing the student about what their chances were. Is it our ethical obligation

in higher education to tell students that they're likely to not graduate and have debt if we know that's the case?

Speaker 11: Have to publish [inaudible 04:21:18].

Karen Marcinski: Right. Hi, David, just a couple quick comments in reference to some of the points that you've made. Schools and the ACCSC visiting team, when they're evaluating institutions for accreditation, do conduct a student survey, as do many institutions as part of their institutional assessment and improvement planning. And part of that is to understand if students are satisfied with their experience, and if they're receiving the quality learning experience that was described during the admissions process. And are they indeed positioned for success?

So there are a lot of varying tactics and strategies that institutions use to affect our recruiting practices. There's also a standard code of conduct that all the institutions are required to review, understand, and agree to. And that is something that ACCSC hold schools accountable to as well. And unless you have a question about our benchmarks specifically, you've made multiple references to 30% or less than the majority graduating, and I do believe there are some data in the petition specific to the percentage of schools over a three-year period who have exceeded our benchmarks. So maybe we need to talk a little bit about how we've established the graduation rate benchmark and dive deeper into that.

But by and large, some of the actions that we've taken as a commission that I think were referenced earlier by Kathleen, meant they were in trouble, isn't quite the case. What we're trying to do is hold institutions accountable for driving student achievement and success. So things like a deferral and the various levers that are available to the commission, those actions are often taken as means and a mechanism to drive greater analysis and root cause understanding of what institutions can do, be it on the recruiting side or in student support and services, how we can best support students to matriculate and graduate.

Michale McComis: Yeah, I think those are all key factors. And Jen brought up the process that the onset evaluations teams use, again, both from a quantitative and a qualitative point of view. So let me give some context to that.

So for example, in 2019, our teams surveyed 18,000 students while on site, as part of on-site evaluations. Ninety-four percent of those students agree that they were informed to the admissions process and the financial aid process. Ninety-four percent agree they were given timely information about academic progress. Ninety-two percent express satisfaction in student services. Ninety-four percent express satisfaction with regard to faculty. Ninety percent express satisfaction with regard to the library and the learning resource system. Ninety-three percent express satisfaction with regard to facilities. Eighty-eight percent express satisfaction with the training and equipment. Overall, 93% felt good

about their decision to attend the school. And 90% would recommend the institution to a friend. That was based on 18,000 students in 2019.

To give some additional data with regard to that, so we wanted to continue to do this through the transition to virtual visits. And so just by way of context, most recently, even in June with our virtual visits, and we conducted 7,800 surveys during that timeframe, the numbers are very consistent with what we have seen in additional years. So we are trying to get that contemporaneous on-site flavor, feedback, from institutions while we are there and use that to make determinations about what is the student experience. And so we've been quite dogged about wanting to continue to survey a very significant number of students through this process just for that very reason.

Now I have one more thing to that, to go back to your other question, and that is we as an accrediting agency require our institutions to make available to students the graduation rate and the employment rate as last reported to our board so that prospective students have that information.

I'm not sure that you're going to find another accreditor that requires that. I'm not sure that you're going to find another accreditor that has the robust outcomes reporting for graduation and employment the way that ACCSC does. I'm not sure that you're going to find another accreditor that has third-party verification of employment [inaudible 04:26:46], independently reviewed akin to financial statements.

So all of these things are very robust factors that this commission has put into play to not just say these numbers are important, but they're important for a reason. And they're not single data points too. They are constructed with intent and with the commitment to really use for positive monitoring of an institution's success.

David Eubanks: Thank you. And I'll just make a clarifying comment and then I'll let my colleagues ask questions. The existence of the dashboard creates a lot of opportunities for misunderstanding, probably. And I want to be cognizant of that. The 30% figure is actually... There's a large institution in that spreadsheet that has a 31% graduation rate for a bachelor's degree program. And if I understand correctly, the low end of the benchmark is 40%. There may be a time lag or some other explanation for that. But even at 40%, which I gather is relative to other historical rates, seems an awfully low success rate for us to aim for. I would say that's in the neighborhood of 60% failures. And whatever means we're using to get from 31% to 40%, why don't we just use the same means to get higher than that? But I'll defer other questions and see who else [inaudible 04:28:26]

Claude Pressnell: All right, Jennifer, you're up.

Jennifer Blum: Great. So actually, I'm going to follow up on David just a little bit, and Michale, you started to go there. I do think for those of us, well, maybe for everybody, I

think it would be really... You touched on the history of your student, your outcomes method... Well, the fact that you have the rates that you have. I actually think it would be helpful... I was just refreshing my memory just now, to be honest with you, with the exhibit that you included, I think it's 16-E, so for those other members who haven't looked at their exhibit 16-E, you might want to do that while we're talking. But it goes through a pretty good summary of your history with the methodologies that you use.

I think it would be really helpful just to briefly... if you could describe, Michale, some of the history behind the rates that you selected to have as bench... I'm going to call them benchmarks, but I know that, as you said, as a holistic, somewhat of a holistic approach. And I also would like to ask about third-party... sort of how you came up with it in conjunction. I believe, I think you say this in the exhibit, outside of the agency, if you will, sort of who you relied on, how you relied on expert help with determining student outcome standards or rates.

Michale McComis:	Well, we might be here a while.
Jennifer Blum:	Well, no, so I [crosstalk 04:30:06].

Michale McComis: I don't know if I can do this briefly. I'll do it as briefly as I can. As I said at the outset, I've been with the agency for 26 years. We began collecting this data 31 years ago. The first data set was collected in 1990, and from that first three years of the data set... And this was done in conjunction with the Ohio State University and Dr. Morgan Lewis, who helped the commission at that time establish what evolved into what our graduation and employment metrics are today. But largely the original iteration of that, we haven't deviated that far from it. We've continued to improve on it and make it tighter, but largely what our system does, and this goes to also, David, I think a question that you were kind of scratching at, is we don't rely on [inaudible 04:31:06]. We rely on data that is directly reported by the institution for every single student that starts in the program. Every student. Not first-time, full-time. None of that.

Every student that starts in the program is put into a cohort and tracked. And another important component of that is when thinking about this, and I've talked about this a lot in the past, is about having a common definition of what a positive outcome or completer or a graduate is. Because there are lots of reasons why lots of other review mechanisms take institutions out of the equation. And we have a very narrow definition of that. There are only four cases why students are removed from the calculation. But from...

Michale McComis: ... students removed from the calculation. But from 1993, the commission began using and establishing and working through that data. And then in 1998 established the benchmarks that have evolved into what we have today. And as I said before, the data then, and continues to show, that from a predictive relationship, one of the strongest indicators for student success, again, is the length of the program. Obviously there are many others and they vary institution to institution. But what we can say with a great deal of certainty is

that the longer that a student [inaudible 04:32:47] school, the more opportunity there are for things to occur, that prevent them from being able to complete. And so that's why, when you look at the benchmarks that ACCSC has established, they are divided into program length categories. And you'll see that there's a higher expectation for graduation rates for short-term programs, because there's less time for things to happen for students to not be able to complete.

As you get into longer programs, and again, our longest category is 24 months or longer, is the 40% a benchmark for those programs. It's not at 48 months, it's at 24. So any program longer than that that reports a graduation rate below that benchmark or any other category, if an institution reports below that they get put into a monitoring mechanism. Now, how do we do that? And so we have a mechanism again, to track every single student that starts any cohort of students. Now, I think somebody said, and it might've been David, one of the benefits of the, I wouldn't really call as a specialty accreditor, but we have a more homogeneous group of institutions that we accredit. And so with that, it creates some opportunity for having cohorts of students that start together, that go through programs together, and there's not a whole lot of potential movement.

Although we have transfer categories, we're tracking those students as well, but we're essentially calculating the graduation rate based upon the number of students that start and the number of students that complete within time and a half, again, with a few exceptions of why students might be taken out of that category. They include things like death, incarceration, active military service, things of that nature. Of the number of students that graduate then, we look at of those how many got jobs. And when I talked about third party verification, that is the number, that when institutions go through an initial renewal of accreditation process, they have to have that number, third party verified, that their graduation rate that they reported is reliable. And so that's an important factor because it's an important metric course.

And so now, once we gather that information, every single year at the yearend reports, and we mean tested and we [inaudible 04:35:22], are you able to calculate a standard deviation? And so the benchmark is actually one standard deviation below the mean for the graduation rates or the employment rates from the larger aggregated data set. Now we used to go through and change those benchmarks every year, when we first started doing this back in 1998, we changed the benchmarks every year and it was a little hectic. So then we moved to a three-year rolling average and then we did an 11-year longitudinal study. I think the timeframe roughly was 2011 to 2019, or that's not quite linear. So we're in that timeframe. But it did include the recession. And we were able to see that there wasn't a great deal of variation from year to year. And even now, looking at, from our 11-year longitudinal study, even this last year, doesn't show anything more than a one to 2% difference in what is reported in previous years.

So we were able to take that 11-year longitudinal study, use that as a baseline to really say, "Here are the rates that we're locking in we're not going to change them every three years, unless we see some significant kind of deviations." And so if it's a significant data set that was used to establish the benchmarks that we have today, and again, the benchmark is what serves as a trigger, but I thought it was interesting that one of the recommendations was that, hey, aren't the evaluators, shouldn't get to make up their own metrics from what should be considered an outcome? And that's wrong. And so even a reviewer goes to a school and says, oh, you know, they only missed the benchmark by 2%, but they had these qualitative factors that I think is not a problem. No, that still goes into the [inaudible 04:37:25] evaluation findings. And it's something for the institution to talk with the decision makers, board members, commissioners [inaudible 04:37:31] evaluators, to make the determination about institutional success vis-a-vis student achievement. Jennifer, I think that was probably not what you would wanted but-

Jennifer Blum: No, no, no. It's helpful to talk about the process. I have one follow-up to that, which is that you talk about the robustness of the process to have the benchmarks. Now I want to talk about something that Kathleen raised, which is in my view, the robustness of how you use. So you clarified, which was very helpful. The three year data that you provided about actions that have been taken in the last few years. I view that as an indication that you're doing your job, you're being robust. How many of those actions relate to, and they might relate to other things, so I still totally understand that they relate, might relate to other problems at a school. Do you happen to know, and if not, it's okay, but how many might relate to your student achievement, outcome expectations?

Michale McComis: Any number that I gave you today would be completely anecdotal. I don't have a direct-

Jennifer Blum: Let me rephrase. How do you find, I mean, these are obviously, I think having, and then part of the reason I'm asking by the way is, there are a lot of agencies up this week where outcomes rates are a part of the conversation, and I'm big on understanding the relationship across agencies. So let me ask differently because I know, [inaudible 04:39:05]. very specific question. This is great for institutional improvement purposes and to keep them on track, at the same time, I also do view them as being partially enforcement, an enforcement tool. When you're seeing a school goes off the rails, I presume that you take action. And so I guess, relative to sort of other reasons that you might take action, where does the student achievement fit in relative to other reasons you might take action? That make sense?

Michale McComis: I'm going to give a kind of a standard specific, and then I'm going to ask Jen to give her perspective as a chair and as a board member. So a couple of things that I just want to clarify on that as well. Our schools reported every single program, program by program. So those rates that you see are by program. It's not an institutional aggregated graduation rate or employment rate. The reason why that's important is because oftentimes an institution may have 10

programs and only one of them has maybe one below benchmark. Great. It doesn't mean the institution is failing. It doesn't mean that the institution is off the rails. It means there's some need for demonstrated improvement in that program. And so the board has to use those [inaudible 04:40:54] and both ways, to understand how successful the institution is institutionally, and how successful the institution is in any given program area.

And I want to harken back also to what David brought up about program advisory committee and the importance of that kind of external validation and feedback. That's part of that, and again, they're not going to find a lot of accreditors that do that, but we deal with career-oriented and vocational institutions. And so program [inaudible 04:41:23] committees are an important part of that, that metric and that data gathering both for the institutions, program success, and for us to monitor. So it's really hard to put a fine point on yes, this number of students, or, I mean, sorry, this number of institutions are in some kind of danger or [inaudible 04:41:50] because it really does run the gamut from something that is, maybe just one program is something that leads to a more institutional action up.

I could give examples, over many years of the commission has had to, and has taken specific kinds of actions with regard to that, but it really does reach over a very broad spectrum of the review process. Every single institution goes through this process consistently. And so it is an important part of how we look at it. And I'll let you get back onto that.

Jennifer Blum: Great question, Jennifer, and from a commissioner's standpoint, student achievement really is graduation rate and graduate employment rates are the bookends by which the commissioners review the overall performance of the institution. So when we're looking at how the institution is performing, if we see a program that isn't meeting graduation rate or that isn't meeting employment rate, there's a number of other questions that the commission is going to ask, regardless of whether or not the on-site evaluation resulted in an area of proposed non-compliance. For example, if employment rate is, graduate employment rate is [inaudible 04:43:31] well, we're going to look at the program advisory council meetings, we're going to look at those minutes because we're requiring that there be documented processes and evidence of everything. So what did the advisory board members say when they came to school and the institution and reviewed the curriculum, the learning resource center, and the relevance of the training specific to industry needs, right?

So are we on point there, if that's not an issue, there's a number of other areas that we're going to look at and sort of direct the school to provide the commission, additional information or response, which might lead to what Kathleen referenced earlier, perhaps the deferral of accreditation until the board feel that the institution has answered the question. Specific to graduation rates, if they're low, the board may look to the previous student satisfaction survey to try and appreciate what is going on at the institution. We may direct them to do a student satisfaction survey as well. So there's a number of

different levers and monitoring and actions that the commission may take when we're looking at student achievement outcomes that are below these benchmarks. Just to provide a little bit of context, I don't have a PDF page, but in the student achievement sessions, if there's a data point, we had mentioned kind of how many programs are below our student achievement benchmarks.

And I think it references the 2018 annual report, out of 4,166 programs with reportable graduation employment rates, 82% met or exceed the graduation benchmarks [inaudible 04:45:29] the respective program length. And 79% of the programs met out of 70% employment benchmark. And one other finer point, I'll just put on your earlier question about third-party verification, it's also important to know that the institution cannot count or record or report in the annual reporting mechanism with ACCSC. They can't report a graduate as employees unless they have verifiable documentation. And there's a standard I'm sure that you all have seen specific to what that is. So we're putting in our institutions to demonstrate documentation that is verifiable graduate employment record, and then as Michale referenced as well, there's another component of third-party verification to ensure integrity in that data.

Claude Pressnell: All right, very good. We've got two more members that have questions, and then we have five third party comments. And so I think thoroughness in your answers is appreciated, but a little more concise would also be expeditious at this time. So Mary Ellen-

Michale McComis: It's my fault, I'm sorry. [Crosstalk 04:46:52].

Mary Ellen Petrisko: Okay, thank you. I hope you can hear me now. A couple of things, one, you said that most of your institutions have 300 or less, or fewer students, and I'm wondering about the data gathering, the IR capacities within those smaller institutions. I think we all know that it's very hard to get good IR people, and I think the smaller the institution, perhaps the more challenging that is for financial and other reasons. I'm asking the question because I'm curious with regard to the large percentage of non-completers, whether you ask that all of the data are gathered or dis-aggregated by various categories, [inaudible 04:47:31] by categories, to really identify students subpopulations, and if they do disaggregate, do you then look for them doing specific support actions or changing your recruitment policies or their admissions, questioning or whatever that is, to help increase the rates of success for various student populations who may not be succeeding at the same rate?

Michale McComis: So let me go specifically to this last part, because I don't know that I've heard a question about the smaller institutions. So on the issue of the way that we gather the data and whether we disaggregate. What typically the board will ask the institution to do is provide institutional improvement and programmatic improvement plan for that. At times, many times in the institutions, we'll go through, analyze the data, may disaggregate it, may not. It's not a requirement that we have as a matter of course for disaggregated data. But there are

instances where institutions, as the way they choose to demonstrate their improvement plan, and their improvement efforts is to try and use that data.

Other institutions will use other approaches as well. At the end of the day, what's important is whether or not the institution is improving, and however, whatever mechanisms they have in place to assess and develop their own improvement plans are for the institution to determine. What the board is typically looking for is, do they have a process in place? And is that process, whatever it is [inaudible 04:49:21]. And so that's generally, there's a whole host of information that the commission will typically ask for through this monitoring process, but much of it is a determined body institution.

Mary Ellen Petrisko: Okay. If you didn't hear the first part of my question, so I want to be sure you hear the first part of this one. I want to get back to some of the conversation that happened actually prior to the agency presenting its comments. And there was a lot said, a lot of questions asked about specific dollar amounts and student success, et cetera, so my question relates to 602.16.1, IX, which is the following, the agency is supposed to set forth expectations, what they want from institutions with regard to the program's record of compliance with the institution's program responsibilities under Title Four of the act, based on most recent student loan default rate data provided by the secretary, results of financial or compliance audits, programs, reviews, and any other information that the secretary may provide. So my question is, what do you ask and what do you get from the programs regarding their responsibilities under Title Four? Can you say specifically, these are the data, these are the narrative, this is what we actually see from them with regard to Title Four?

Michale McComis: Well, typically, let's start with a program review. We'll typically get, if an institution goes through a program review, the department typically asks us upfront for information that we have, that we can share. And we typically get the final report of that, which we then review and determine whether or not there's any additional follow-up that we should be that ACCSC should be looking at in terms of, are they fulfilling the requirements set forth in the program review. If there are other types of actions, HCM1, for example, a lower than 1.5 composite score will certainly trigger a financial review by ACCSC. And if a school is placed on HCM1 that we are monitoring to make sure that they are meeting the letter of credit requirements or whatever other requirements that department may have determined. With regard to default rates, as I already mentioned, we typically get that into that information ourselves, by just going to the data that's available and using that and running it through our own protocol and determining which institutions need to go into a monitoring mechanism.

Mary Ellen Petrisko: The concerns that were expressed by some, at the very beginning of the meeting, really, we're looking at [inaudible 04:52:21] issues, is that correct? And I'm not saying good or bad, I'm just saying it doesn't really touch the issues of amounts and numbers of students, the kinds of questions that were raised earlier.

Michale McComis: That's correct.

Mary Ellen Petrisko: Thank you.

Claude Pressnell: [Inaudible 04:52:35] Bob, you're on.

Bob Shireman: Thank you. I have a question about the enforcement timeline, about enrollment agreements, and then nonprofit conversions. I have several questions in that nonprofit conversions category. On the enforcement timeline, and I think this probably goes to some of the other criteria as well, but part of the reason that there's a lot of attention and a lot of public commenters about ACCSC is that there has been quite a few institutions that have come under law enforcement and other scrutiny that have been accredited by ACCSC. And some examples, the CEHE Colleges, Independence, Stevens-Henager College, CollegeAmerica, they were sued for fraud by the Colorado Attorney General in 2014. Yeah, it was not until just a few months ago this year that ACCSC took action to, it's my understanding, took action to withdraw the school's accreditation.

                      Bad Rock College, which I think has now closed, its problems first became apparent in 2012. It became more apparent in 2014 with a fraud verdict in Missouri and ACCSC did not end their accreditation until the school was on the verge of collapse in 2018. So that seems like six years when the school was continuing to involve students under the umbrella of ACCSC's accreditation and then Premier Education Groups of schools were exposed for some abuses as early as 2011. And accreditation for them was not cut off until November 20th of last year, if I have my information correct. And it is certainly not unusual for these kinds of things to take a very long time and for the Department of Education itself in its approval of schools to kind of see, they seem to hang on, but I have always thought of accreditation because it is an independent and voluntary association where schools apply, that it is a higher bar, accreditation should be a higher bar than just, not a fraudulent institution.

                      So I'm wondering if you can tell us about what takes so long when problems become apparent about a school. What is it, that kind of gives everybody this impression that the schools just continue to be accredited, continue to draw down millions of dollars, even when it becomes pretty clear that there are serious problems?

Michale McComis: Well, I don't know that I agree that everybody views this the same way as you've couched it. And there are several significant factors that go into each of the cases that I'm really not able to go into here today. What I can tell you is that the commission has a very specific standard on a maximum timeframe, that the commission has provided evidence to the department that it follows those practices and that the standards that the commission and the rules of the commission has established meet the federal requirements.

Bob Shireman: Thank you. On their recruiting standard, 602.16.81, the II, you mentioned enrollment agreements, and as I'm sure you are aware of, one of the ways that predatory schools have historically prevented students complaints from reaching the eyes of regulators have been, to have a forced arbitration requirement in year three, where students are prohibited from going to court and frequently they are prevented from complaining along with other students in any kind of a class basis, and in many cases they're required to keep their concerns confidential. There's always an exception for going to law enforcement, but all of the serious problems we've seen at schools we're hidden for longer because of forced arbitration clauses. What are you doing to prevent this problem, given that you do have some rules regarding enrollment agreements that could prohibit the use of forced arbitration?

Michale McComis: What the ACCSC Enrollment Agreement requires is for students to be fully informed of whatever the policies and procedures are for that institution. The commission ACCSC has not taken any position on the appropriateness or usefulness or lack of use, or the appropriateness of the use of arbitration clauses.

Bob Shireman: Is that's something you've discussed at all internally, the idea of addressing that, given the seriousness of that abuse?

Michale McComis: It's not an issue that the commission has discussed.

Bob Shireman: Okay, thank you. So next I want to go to the problem of suspicious nonprofit conversions. One way that for a school to send a message to students that will serve them well is to say that a school is nonprofit and in general, consumers are not wrong to have more trust in nonprofit institutions. But nonprofit organizations, when they are legitimate, have built in guard rails that protect students. By law, they must reinvest all of their revenue back into the institution. No one is extracting profit. And while the institution, or while a institution needs the money to keep the lights on at a nonprofit, no one that controls the institution is incentivized to spend less on student support or financial aid in order to pad their own pocketbook.

    I'm sure you are aware of some of the gambits where a school owner says that they're converting a for-profit to nonprofit, that they engage in all kinds of games to continue to operate the school, essentially as their school feeding profits to them. The school in that situation is not describing itself, honestly, which is one of the requirements under your recruiting standard. The various versions of this gambit were laid out in a GAO report six or seven months ago. They include school owners have the nonprofit sign a promissory note for a whopping amount of money to be paid to them in the future, supposedly based on the purchase price, but inflated by bogus intangible assets. They turn over those intangible assets to the nonprofit but they keep the real property, the buildings, and they have this nonprofit school pay them rent on those buildings. And/or they maintain control over the school by putting their lackeys on the board or as a sole member of the corporation, creative use of kind of various

corporate control questions, and they're able to name or remove board members.

I'm going to ask about, for conversions that are under the purview of ACCSC. One of the most audacious of these conversions was run by one of your members, CEHE, independence university and some other colleges. As I mentioned, there had been a Colorado AG Report, the Education Department denied their claim to nonprofit status in 2016, after the New York Times story about the school owner. And throughout all of this, the CEHE school remained accredited, and it was only recently that you took action against it. What can you tell us about that CEHE and that the nonprofit conversion and your review of that situation?

Michale McComis: I can't really speak to anything with regard to that conversion for that case.

Bob Shireman: Another suspicious conversion that is accredited by ACCSC is Remington College's. You actually received a letter from one of my colleagues about this in 2018. At the time, all of the board members were financially connected to the school or to its former owner, I don't know whether that is still the case. What can you tell me about your review of the Remington College's conversion?

Michale McComis: So Bob, maybe I can handle this instead of going case by case, just tell you what the commission's rule is in this regard. And so I'm going to read to you what the current rule is for both ownership and for what we receive and review, what we'd call a change of control for any nonprofit. So if the school is part of, or owned by a nonprofit organization corporation, an individual entity group, owner or manager, and had any financial interest in the nonprofit organization or corporation may not serve as a board member, have a seat on the board, or be a member of the corporation. That is the commission's current rule with regard to those kinds of convergence. And it applies to, from the time that it was put in place going forward.

Bob Shireman: Thank you. Why don't I continue with my list. And as you know, that the GAO Report laid out various ways that non-profit status can be corrupt during these situations, sometimes through those kinds of specific corporate governance, but also sometimes through contracts and other kinds of conversions. The third school I wanted to mention, bring it up, is a so-called Hallmark University in Texas, like CEHE and Remington, the owner kept the real property, became a landlord, the school was valued for the transfer at $26 million, but almost all of that was intangible assets. And in fact, 17 million of that was the declared value of the ACCSC accreditation. So that the value $17 million is what ACCSC as the accreditation [inaudible 05:05:15] work, apparently.

The appraisal to substantiate that value was done by an appraiser whose business is in equipment appraisals. Now if anything related to education are intangible assets and the valuation, that appraisal, which was part of their IRS documents, which are public, includes language that should warn away any regulator away from using the information in the appraisal. The appraiser said

this evaluation is to support the sales price before regulatory authorities, our opinion of value should not be used for any other purpose. It also said data was provided, and not audited. And then again...

Bob Shireman: ... applied it and not audited. And then again, it said, again, this report was restricted to be used by management only to support the sale of the company to a not-for-profit entity. And to support the sales price before working with authorities. It did not seem to be truly a valid kind of appraisal. Is this the kind of documentation that ACCSC would review in reviewing a change of ownership? That the appropriateness of the price paid by the non-profit to the former owner.

Speaker 14: I'm not prepared to speak on any particular action or any particular review. But as we provided to the department, the commission has a very robust change of control and change of ownership process. We've provided the applications and the type of information that you would review as part of that, which is quite comprehensive. And would include a significant data and information relative to the transaction. That's the process that we've had. That's what we've laid out. That's what we've provided to the department. But I can't speak with regard to any specific review or [crosstalk 05:07:21].

Bob Shireman: As a general matter, would ACCSC look to documentation of the purchase price and appropriate appraisal of that purchase price by the non-profit of the foreclosure?

Speaker 14: There's a large [inaudible 05:07:40] of documentation that would be looked at as part of that process. I can't speak to specifically right now as to whether or not that application requires further evaluation documentation, or the authenticity or the appropriateness of it. But it's, again, a number of factors go into these assessments and these evaluations. And before any determinations are made with regard to those types of transactions.

Bob Shireman: Okay. Mr. Chairman, I will stop there. I think that is all of my questions for the [crosstalk 05:08:16].

Claude Pressnell: All right. Thank you, Bob. All right. Let's move on to the third party comments. I have got a list of five individuals. Michael Itzkowitz with Third Way. William Hubbard, Veteran's Education Success. Marissa Navarro with the Center for American Progress. Nora Ann House with Oklahoma Board of Private Vocational Institutions. And Tony Mosley with ACCSC Volunteers. So let's start with...

George Alan Smith: Um.

Claude Pressnell: Michael Itzkowitz. And-

George Alan Smith: Claude, this is George.

Claude Pressnell:	Yeah.
George Alan Smith:	I think Mr. Hanes will have someone in his place. Barmak Nassirian. Barmak likely will come after Michael Itzkowitz.
Claude Pressnell:	Okay.
George Alan Smith:	All right.
Claude Pressnell:	All right. Thanks.
George Alan Smith:	Sure.
Claude Pressnell:	Just a reminder to the third party commenters. You have three minutes. I'm going to be... in fairness to everybody, it will be just three minutes. So when we pass the two minute mark, I'll put my finger up. They get one more minute and a warning. So, Michael.
Michael Itzkowitz:	Thank you. My name is Michael Itzkowitz. I currently work as an Education Consultant and Senior Fellow for Third Way a [inaudible 05:09:37]. I also served as the Director of the College Scorecard. Thank you for the opportunity to comment today regarding the recognition of the Accrediting Commission of Career Schools and Colleges. Accreditation agencies serve as an important part of the child. An accredited stamp of approval is supposed to signal that an institution has met a standard of education quality to the students who enroll. As you all know, it also allows access to billions of federal student aid that is dispersed every single year in the form of Pell Grants and federal student loans. With student's futures and tax payer dollars aligned, it's important that accrediting agencies get it right every single time. And while ACCSC has told it story on how it's working to ensure good outcome for students, the federal data tell a different story of many of the schools it oversees.
	Alarmingly, it's stamp of approval too often leaves students worse off than if they hadn't enrolled in the first place. Especially, for our most vulnerable students. And the implication of this can be huge. For example, we've run numerous studies that show a high proportion of ACCSC schools offering no economic return on invest whatsoever. Last year, we released a report on the price to earnings premium for institutions across the country. In short, we measure the time it takes former students to recoup their educational cost based off of the net price they paid to attend and the earnings premium they obtained after doing so. Using the previous accreditor data file, we ran the numbers to see that out of the 230 institutions that ACCSC oversaw at the time, 59 over a quarter of ACCSC schools showed no ROI for their students. This means that the majority of students who attended these schools earned less than someone with no college experience whatsoever.

In a follow up report, we saw the results were even worse for our most vulnerable students at these institutions. 69 out of 174 ACCSC institutions with available data or 40 percent of all ACCSC institutions showed their low income students failing to earn as much as a high school graduate, even 10 years after they enrolled. These of 69 institutions still receive $837 million during that award period. Rather than serving as an engine of socioeconomic mobility, they're perpetuating many of the socioeconomic barriers that already exist to our underserved communities. While ACCSC will make its case for how well they use student outcomes to inform accreditation decisions, these data tell a different story for just way too many of their member institutions. We simply cannot afford to have another college accreditor provide its stamp of approval to institutions that leave students worse off. We need the assurance they have claimed to provide to be backed up by the outcomes that they produce. If not, we'll likely see a repeat of history where students are left worse off with limited career opportunities, and with unmanageable debt, with tax payers ultimately footing the bill.

Thank you very much for this opportunity to comment.

Claude Pressnell: Thank you. And you were eight seconds short. So very good. Appreciate your comments. And George, I'm sorry. Who did you say is taking Mr. Haynes' place?

George Alan Smith: Yeah. I believe it's pronounced Barmak Nassirian.

Claude Pressnell: Yeah.

George Alan Smith: Okay.

Claude Pressnell: Yeah.

George Alan Smith: He would be next.

Claude Pressnell: All right. Is he on? Candace?

Candace Evans: Yes. He is.

Claude Pressnell: Okay. [crosstalk 05:12:49].

Barmak Nassirian: Yes. I don't know whether you can see me, but I hope you can hear me.

Claude Pressnell: I can hear you. So that's perfect. Go ahead.

Barmak Nassirian: Wonderful. Good afternoon, Mr. Chairman, members of the committee. My name is Barmak Nassirian. And I'm delighted to provide comments on behalf of Veterans Education Success, which is a nonpartisan policy research and student advocacy organization committed to improving educational outcomes for veterans, military connected students, and their families. I have listened very

attentively to these hearings. And I appreciate the difficultly and the arduous nature of the work that the committee does, that the department staff engage in, that the commission itself has to go through, and with enormous respect for [inaudible 05:13:44] with whom I had the pleasure of serving on, I'm not sure, one or two negotiated rule making committees.

In listening to the discussion, a certain causality is beginning to emerge as to the tale of two cities that accreditation has turned into. It is very clear that to the Department of Education satisfaction, perhaps to this committee's satisfaction historically, and to the satisfaction of many institutions, accreditation is working well. Primarily because they appear to think of it as procedural compliance. And procedural compliance is wonderful. We heard how robust these procedures can be, both in terms of how the department reviews accreditors. As well as how accreditors review institutions.

There's really only one problem with this and that is that it appears to be entirely oblivious to outcomes. I heard Dr. [Eubanks 05:14:48] questioning about predicting potential outcomes. And we can have all kinds of conversations about whether that is possible or not. But surely, we can look back as Bob Shireman just did. And realize that if these post-facto outcomes are not comporting with the rigor that the compliance requirements appear to suggest. So I would urge the committee to postpone the final recognition of the commission until such time as it can potentially answer some of the questions that have been raised.

Thank you, again, for the opportunity. And best of luck to all of us.

Claude Pressnell: Thank you very much, Barmak. And we have now Marissa Navarro. Marissa, are you on?

Marissa Navarro: Yes.

Candace Evans: She is.

Claude Pressnell: Okay. We can hear you. So feel free. Thank you.

Marissa Navarro: Great. Good afternoon. My name is Marissa Alayna Navarro from the Center for American Progress. Thank you for the opportunity to provide comments today on ACCSC. Over the past couple years, we have watched the Center for Excellence in Higher Education or CEHE crumble under the weight of evidence that if colleges were consistently putting students in harms way. However, none of these problems were news to the accreditor. And that is why [NACIQI 05:16:12] must take a closer look at ACCSC mishandling of CEHE as it considers renewing recognition. When ACCSC withdrew recognition from CEHE, it was too little too late. As [CAP 05:16:28] wrote in a recent report, it came after a decade of problems and after CEHE received over 1.8 billion in federal funds. ACCSC had numerous opportunities to withdraw accreditation or, at minimum, provide

CEHE a strict maximum of two years to improve. For example, it could have ended their accreditation as early as 2013 when it placed the system on [inaudible 05:16:58] for systemic issues in recruitment, admission, student achievement, advertising, state licensure, and cohort default rate. Instead, it dropped the action six months later.

By the end of the 13 years, ACCSC had raised concerns more than 30 times. But colleges affiliated with CEHE were likely failing to meet standards. Meanwhile, a state agency and several federal government agencies also alleged wrong doing by the college, including an accusation from the US Department of Justice about illegal recruiting practices. In addition to reviewing this history during the renewal process, NACIQI should also recommend that the Department of Education investigates ACCSC for its failure to act in a timely manner to protect students and tax payers. But even more importantly, NACIQI should recommend that the rules that allowed for this failure of oversight be changed. The Department can do this by establishing stronger guidelines and consequences for when accreditors must act and by strengthening regulations that were significantly weakened last year that allows colleges with even more time when they do not meet standards.

Thank you for the opportunity to speak today.

Claude Pressnell:	Thank you, Marissa. And next, we have Nora Ann House. Is Nora on the line?
Candace Evans:	Yes, she is. I'm going to promote her now.
Claude Pressnell:	Thank you.
	Nora? Do we have Nora, again?
Nora Ann House:	Right here.
	Hello?
Claude Pressnell:	Yeah. Nora? Nora Ann?
Nora Ann House:	Yes.
Claude Pressnell:	Yeah.
Nora Ann House:	Yes, can you hear me now?
Claude Pressnell:	Yes. We can. Wonderful to have you. Feel free to begin at any time.
Nora Ann House:	Okay. Thank you. I am the Director of the Oklahoma Board of Private Vocational Schools. My agency licenses about 110 schools at any given time. About 70 percent of those are accredited by ACCSC. We do not require independent

accreditation. But think of it as an additional arm, an additional branch. My background, I'll tell you. I'm a former State A2 [Mode 05:19:27] Regulator. And I served as the President of the National Association of Managed Care Regulators before I came to this agency. Absolutely, there's too much work for all of us to do. There's too much work for any single triad member. We do need to work together. And I think my background in Managed Care helped me to have a basis when I first got here in 2011 to understand the processes.

If a school chooses to include a time, effort, and expense to be accredited, our rules were changed a couple of years ago that the state now uses its resources to help require schools to comply with those regulations. We mandate it. And we actually can take action against a school if they violate the much more detailed standards of the accreditors. We also appreciate that when ACCSC schedules a site visit, 100 percent of the time, we are asked for our concerns during the planning process for the site visit. I personally have attended about 21 visits of all different sizes of our schools. In that process, there are no holds barred. I can attend the student surveys, the student and personnel interviews, everything. I find the process to be very well-coordinated. Every one of those visits had well-trained personnel that acted very professionally. And they were thorough reviewing data. A school could not... Or I've not seen a school get passed ACCSC that they have something like a process that looks good on paper. ACCSC digs to make sure that their process matches to their process.

In general, I found well-equipped facilities, exceptional management, efficient systems, well-trained faculty. And teams willing to understand our state authorization process. I see the system as working. It really puts together a better base for review for that state license that starts it all before somebody can get to accreditation. Before somebody can get to access for their students to the Title IV money.

Claude Pressnell: Thank you for your comments, Nora Ann. Your time is expired.

Nora Ann House: Thank you.

Claude Pressnell: Yeah. Appreciate it. And finally, we have Tommy Mosley. An ACCSC volunteer. Dr. Mosley, are you online?

Tommy Mosley: Yeah. I think so. Can you hear me?

Claude Pressnell: You are. Thank you very much. Feel free to begin at any time.

Tommy Mosley: Let me begin by thanking the committee for having me on today. I appreciate that. I'm going to make some remarks pertaining to what I haven't heard talked about too much today is actually the onsite visit and the training qualification expertise of the teams that go on site. My background, I have probably done over 150 onsite visits with different accreditors from regional accreditors to national accreditors. In some of my previous work, I worked with the State

Department and did, probably, over 500 over five years of program reviews. So I've been doing this a good bit of time.

I want to say... I don't want to compare one group to the other. But Dr. [McComis 05:23:13] is went over so in depth and in great detail the progress that's been made and the type of programs that's been going on. I really believe that there's, maybe, three or four valuable factors, important factors that I look at when I begin an evaluation process. I think the first thing that we need to look at is the standards. The commission has very in-depth standards. There's a lot of training from the staff that goes out to do the onsite visits. A lot of training with regard to different types of the areas that we're responsible for. Teams usually consist of a team leader, someone that has an administrative role in a school that's currently accredited by ACCSC. An educational specialist, that's my role. I have a background in educational administration. We have occupational specialists, those that are experts in the fields that we're evaluating. So the team is a small team. It's a very comprehensive team. The team can be as large as the number of occupational programs they have. But each one of us are... Oh, I better hurry. Each one of us are responsible for learning the parts of our standards that we're required to do.

The second thing, I think, is the training that they provide us. The commission provides each one of us with a great deal of training. We can get all kind of training that we need. I'm in fact done some training videos myself, some webinars. And the last thing is the staff. They do a great job embedding and making sure the evaluators that's going out on staff have the right type of qualifications to be trained. And be able to go out and do a good job. So in closing, I think the commission does a great job of providing quality evaluations from its member institutions. And I thank the committee for the time.

Claude Pressnell:	Thank you, Dr. Mosley. Appreciate it very much. So now we would invite the agency to come back and respond to the third party comments.
Michale McComis:	We'd like to thank all the third party commentors for the information and perspectives that they've shared. We don't have any responses or comments with regards to any of them. Thank you.
Claude Pressnell:	All right. Very good. Now we have the department staff come back. [Reha 05:25:55], you want to come back and you respond to agency comments and also third party comments.
Reha Mallory:	Yes. Thank you for those comments. I don't have anything further.
Claude Pressnell:	All right. So do the readers have a recommendation, a motion to make? Kathleen and David. Kathleen?
Kathleen Alioto:	[inaudible 05:26:44].

Claude Pressnell:	There you are. Yeah, we can hear you now.
Kathleen Alioto:	Okay. I personally cannot vote to support the recommendation of the department. I don't know if I should do that in the form of a motion. Or if some of the questions that... if we could just table it until we have our other discussions about the direction of NACIQI and rewriting the regulations as they were last year. Because I understand the question of what the department, what the accreditation committee has to deal with. And also looking at it in terms of student debt, the lack of student success in many of these institutions. I think the agency presents a very good PR presentation. But in terms of what's actually going on in schools, I think there are too many schools [inaudible 05:28:16] students. So I cannot vote in favor of the motion. And David, were you thinking of making another motion?
Claude Pressnell:	And whatever motion you make is got to be directly related to the criteria. So we're not going to be in a position at this meeting, or probably even the next, to expand the scope. I think we can make suggestions around it. But if you have found them in violation of a particular criteria, then you have a motion to make there. So let me encourage you that whatever you do decide to bring as a motion has got to be directly tied to a criteria.
Kathleen Alioto:	All right. Well, I would like to have a 12 month time for them to come into a more... I think they speak very well. But 12 month period for them to come back to us on what is happening on the 346 schools that [inaudible 05:29:43] on why they're off probation.
Claude Pressnell:	Yeah. Herman and George, I may need to defer to you all. But do the motions need to directly relate to violation in a criteria? In other words, what criteria are we [inaudible 05:30:06]?
Herman Bounds:	Yeah. This is a... I don't know if anyone else needs to speak, but I think it's going to be hell for them. You're going to have kind of point out which one of the criteria for recognition the agency is not compliant with.
Kathleen Alioto:	I think it was right in the beginning of their question phrasing that they gave us those facts.
George Alan Smith:	You also have, in the packet that Monica sent out, some really strong examples of the types of motions you can make. I would encourage you to look at those. And I think you might have also reached out to David, your co-reader, who might also have some thoughts, too, about what motion he might suggest making since you guys are co-primary readers.
Kathleen Alioto:	David?
Claude Pressnell:	David?

David Eubanks:	Yes. Thank you. I'm not terribly experienced yet with the committee. I understand what's supposed to happen now is that we make a motion per the Department's recommendation because there are no particular faults with any of the standards. Despite, I think, a great deal of uneasiness about student achievement and some other things. I don't know that the evidence we have rises to the level of being able to make a specific recommendation that says that the agency is not in violation or is in violation of the standards. However, it sticks in my craw to make the recommendation that we should go forward with another five years. That's easy to make if somebody else wants to do it.
Bob Shireman:	I liked your idea of a 12 month... or Kathleen's idea of renewing for 12 months. I agree we don't have enough information to say for sure that they're out of compliance with something. But I think we are all feeling an inadequate amount of review and information. So if we have some sense of a different recommendation, I would recommend that ACCSC recognition be renewed for 12 months. We can do a redo and do a review to our satisfaction in a year.
Claude Shireman:	I might mention as well that the secretary's office not only looks at the recommendation, but also reads transcripts. So just to be assured that concerns that have been raised are going to be brought to the attention of the Department Official as well. Just to put that out there.

I believe that that is a proper motion. That you're basically making a motion for full recognition for 12 months. In other words, the [inaudible 05:33:27] application you're making is the timeframe, not to [inaudible 05:33:34]. |
George Alan Smith:	And Claude, our legal counsel would like to make a comment...
Claude Pressnell:	Thank you.
George Alan Smith:	... at this time. Thanks.
Donna Mangold:	Hi. It's Donna [Mangold 05:33:46]. Can you hear me?
Claude Pressnell:	Yes. Thank you, Donna.
Donna Mangold:	Okay. We've been having some technical difficulties in the room. I just... I think it might be helpful if I give a little bit of context just to [inaudible 05:33:57] the regulation... We are under the regulations that went into effect last July. And I just want to repeat them for everyone. So maybe that will give a little bit of context to how you make the motion. So bear with me while I read a little bit.

It says that, "At each meeting of the advisory committee, the advisory committee forwards to the Senior Department Official its recommendation with respect to each agency. Which may include, but is not limited to. For an agency that is fully compliant, approved the review recognition. Or continue recognition with the required compliance report to be submitted to the |

department within 12 months from the decision of the Senior Department Official." And if you do a compliance report, it needs to identify what regulation is not in compliance. You have another option. "In conjunction with..." I'm sorry. "In the case of substantial compliance..." And if anyone wants to read along, I apologize. I'm in 602.34G. The other option is, "In the case of substantial compliance, grant renewed recognition and recommend a monitoring report with a step deadline to be reviewed by the department staff to ensure that corrective action is taken and full compliance is achieved or maintained. Or for action by staff under 602.33 if it is not." Your other options are to deny, limit, suspend, or terminate recognition.

And then the other ones deal with scope, and that's not the issue that we're talking about here today. So hopefully, that gives a little bit of some guardrails for what a motion might look like.

Claude Pressnell: Yeah. Thanks, Donna. The only question I've got is that, obviously, it starts off with "which may include, but is not limited to." And all Bob's doing is making a motion with a modification on the time versus fighting a particular violation of the criteria. So is it your opinion that if we adjust the time, that that's outside the scope?

Donna Mangold: No. I think you can do less. I guess the problem I would defer to Herman on is whether enough can be accomplished in terms of timing for the staff to actually review the...

Claude Pressnell: Mm-hmm (affirmative).

Donna Mangold: ... they can do a compliance report or something more limited. So that they could come back in.

Claude Pressnell: Sure. Because... And that happens with all accrediting agencies is that if you request a report in 12 months, you're really talking about eight months or 10 months versus... So, yeah. Herman, that would be very helpful [inaudible 05:37:16] make modification on the motion.

Herman Bounds: Well, I would just say depending on which one of these that Donna read aloud in G, I wouldn't know until I have a better understanding of what the report is supposed to consist of. And of course, this is all up to the [inaudible 05:37:46] Department Official, too. Whatever they decided. Whatever he decides is going to be the law of the land. But just in a general sense, have it... there's nothing here to tell me what they're supposed to give me in 12 months. Again, depending on which one of the recommendations in G that need [inaudible 05:38:09] one through four you're supposedly going to go with. I couldn't answer that question without knowing what they're supposed to do or give me.

Claude Pressnell: Okay. We've got some questions here that may bring some clarification as well. I believe Jennifer, and Mary Ellen, and Paul.

Jennifer Blum: Yeah. I'm going to... I sound like a... I guess this is how it's going to be. I really want to emphasis consistency. Because if we're going to do a one year or something where the department bounds, literally, it was a pretty clean record. And if we're going to go through the process of a one year here, we better nail down exactly what criteria we're asking the agency to come back to. Because this is going to be a very long meeting and a lot of one years. Because especially on the items like student achievement or taking of actions, I know... and I understand Kathleen raising how many schools they have or have had. Because they don't have 300 and whatever right now in action. I think Michael's clarified that a number of times. And I view that as an active accrediting agency. So I don't view that as a negative. I view that as an agency doing its job.

                   So I am extremely concerned from a consistency standpoint. Because if I'm going to make a decision on this... or we're going to make a decision on this agency, then every single one that we look at from a process standpoint has to be similar... doesn't have to be identical. But there needs to be some rationale here. And I think there have been very good policy arguments. I agree with Bob on conversions. I think it's something that we really...

Jennifer Blum: ... Arguments. I agree with Bob on conversions. I think it's something that we really need from a policy perspective. We being the... Not necessarily as creditors, the department needs to really review and it's a subject, I think of potential conversation and the neg reg, but I don't see a criteria item, a [crosstalk 05:40:21] criteria item. And so that's my concern. My only other final comment is, I've struggled just time-wise the last couple of weeks to look at everybody's records, the exhibits and such.

                   We're listening to an agency, each agency speak, but what's really in a lot of the records on our e-recognition system are detailed exhibits. And so Mary Ellen asked a question earlier that Michael answered, and I pulled up... I mean, there are exhibits with regard to financials of an institution. I think it was 16 X and Y, I think, that answers sort of I think a lot of Mary Ellen's questions.

                   And so again, the record here is a pretty complete record. So I'd be very concerned unless we have something very concrete to tie this to, in terms of expectations next year. I'd be reluctant to... I'm not saying necessarily five years, but a compliance report when in one year doesn't make much sense to me.

Claude Pressnell: Okay. Thanks. Mary Ellen.

Mary Ellen Petrisko: Well, I'm also wondering about first of all, what exactly do we want to see, whether that's in one year in a compliance report or in monitoring report [inaudible 05:41:41] for whatever period of time that is. Looking at the criteria that we are supposed to look at, and we are limited to, it would seem to me based on what we've heard and perhaps not only, but especially from some of the third-party commenters, that it would fall under [inaudible 05:41:59].

So if that's the case, what would we want to see either in process with some evidence and some other data, or progress and in better the statistics, the day that we've heard that we could get in a year? I mean, I think we have to agree first of all, if that's the criteria, that that's the criteria. And if that's the criteria, what specifically can we get that they can give us that is convincing, and that it's evidence that's going to make us have an opinion other than a sort of... I don't know, a questioning at this point about how we should proceed with regard to the recommendation to the [SDO 05:42:48].

Claude Pressnell: All right, Paul. Thanks Mary Ellen.

Paul LeBlanc: I don't know if this is a question for Monica or [inaudible 05:42:54]. I agree with John. If you look at the agencies, in terms of what's on paper. So it looks okay... It's hard to sort of find which criteria would [inaudible 05:43:04] with perhaps an exception of [inaudible 05:43:08] as Mary Ellen said a moment ago.

If I look at activity. Yeah,. Lots of activity. I think that just comfort I sense, at least for myself and many in this discussion, is that there is [inaudible 05:43:21] between what's on paper and what sort of appears to be the case. And then when we look at actual performance of institutions and lacks of some enforcement, et cetera. That's what I'm struggling with. I don't know, [inaudible 05:43:33] or Monica, if there is room in the way that John thinks about this to say, it's not enough to simply be okay on paper, because that's a fundamental issue in my mind.

Claude Pressnell: Thanks Paul. Ronnie.

Ronnie Booth: Oh, yeah. [inaudible 05:43:57] probably echo, [inaudible 05:44:03] the departments in a bit of a bind, if you would, because the department can only enforce what regs and the law says the department can enforce. And the department global may be able to enforce some other things, but the department specific in the [NACIQI 05:44:19], we only have certain responsibilities. But something keeps bugging me, and it kind of goes back to that question, just because something's legal doesn't mean it's moral and ethical. There are some behaviors in this country that I won't mention that are legal in some states, but others may have some issues with those, whether or not it's behavior we want to engage in. And I think that's the hesitancy I'm hearing from a lot of people as well. Just because it's the law doesn't mean I want to do it, or I should do it, or I want to encourage my children to do it.

So that's kind of the dilemma I'm facing now. But at the same time, I think we've got to send a clear message that we've been kind of sent to a gunfight with a knife, if you will, or not given the tools we need, because part of our... Two words in our title, "Quality and integrity," and I'm having a hard time with some of the quality and integrity issues. But I don't have, if you will, the ammunition to fight that war, given the regs we have to work with. So I could not vote now for five year. Best I could abstain. I could not vote, because I'm a brilliant

[inaudible 05:45:40] quandary. Just because I check a box doesn't mean that I approve.

And Bob's put some things up here in the chat, that I think are worth looking at. There's some behavior that's been problematic, and I think that behavior has to be addressed somehow, but I'm not how to do that.

Claude Pressnell: Thanks Ronnie. Kathleen, are you back? You had your hand up. All right, Wally, you're next.

Wallace Boston: Thanks. As I look at this, I tend to agree with Jennifer, that if we want to send a message, we better be clear about what criteria we're sending the message under, because there are a number of other agencies that are coming that it would be tough to go with a five-year recommendation. I can't see a specific criteria here. I can relate to comments from both sides. I would just throw out there as an alternative, and wouldn't mind hearing Herman express his opinion on this, that perhaps we go with three years if some of us can't handle 12, but others of us don't believe that 12 months is reasonable either, so.

Claude Pressnell: Thanks, Wally. Kathleen, you're back.

Kathleen Alioto: Can you hear me?

Claude Pressnell: Go ahead.

Kathleen Alioto: Can you hear me now?

Claude Pressnell: Yes. Go ahead.

Kathleen Alioto: It's under student achievement as Mary Ellen was saying when I went off. It is student achievement, and it could be that we ask them to come up with a plan, a concrete plan to present to the schools, in terms of warning, promotion, and [inaudible 05:47:56] for the 346 schools that they have under their ages. I mean, I'd prefer to ask them to do that in a [inaudible 05:48:08] how about 18 months? There a very specific saying, it's dealing with student achievement, and it's also dealing with thousands of students lives.

Claude Pressnell: Right. So you're suggesting that the materials submitted in the application is not in compliance?

Kathleen Alioto: I don't consider it in compliance. The 382 schools out of the 685 or whatever it is, is not in compliance. They are telling us they're not in compliance. We're not telling them, that's in their documentation.

Claude Pressnell: Yeah, I was just trying to get clarity on that. So as in the position that we're in right now, and I know [Bob Shireman 05:49:04] would speak to his motion, but Bob has made a motion, motion is on the table. There's not been a second yet

to the motion. We should've done that just to see if there is a second to that motion, but since we're in the position we're in here, Bob, why don't you go ahead and see if you want to withdraw your motion, if you want to move forward with your motion, what you would like to do?

Bob Shireman: Sure. I will accept Kathleen's friendly amendment or a recommending of a renewal for 18 months. I think that's a reasonable period, given some of the timing concerns. I think on the issue... As somebody mentioned, I threw into the chat six or seven different criteria that we could potentially name if we made it this a compliance issue, however, my view is that we are all kind of flailing to try to figure out which compliance provision is the right one, et cetera. And I feel like the senior department official is in... The senior department official, as I understand it, has full range of options available to them to make whatever recommendations that they think are reasonable. So the senior department official could in seeing that there's a staff recommendation of 5 years and us for 18 months, they could do one or the other or something in between, or they could call for a compliance report reviewing our transcript, the issues that were raised, they might want to do a compliance report, but it feels premature or maybe just too difficult for us to figure out which ones are the right ones.

And so a renewal for 18 months seems to send the right message from us that we think a more thorough review is needed. So I'll stick with... I'll go with that 18 months is my motion.

Claude Pressnell: Okay. All right. So this is going to be under the category of 'you can do the following, but not limited to'. So we're in the not limited to space. And just to state Bob's motion, is that you are agreeing... Well, go ahead and state your motion. You're going to grant them credit continuance for 18 months? [crosstalk 05:51:44]

Bob Shireman: Renewal of their recognition for 18 months.

Claude Pressnell: But not tying it to what?

Bob Shireman: Not tying it to any particular... Just plain renewal for 18 months.

Claude Pressnell: All right. Is there a second to that motion?

Jill Derby: I'll second the motion.

Claude Pressnell: Okay, so [Jill Derby 05:52:05] seconds the motion. Now, we've got a lot of hands up again. So if I could just ask that if you're not looking to be recognized now to take your hand down. All right, and let's go back to our lead readers, [David Eubanks 05:52:21].

David Eubanks: Thank you, colleagues.

I appreciate what Jennifer and Wally said, and Mary Ellen too. We have to be careful of precedent, suddenly doing something very different. For me, this goes back to [inaudible 05:52:44] comment, that what we're engaged in is procedural compliance that may have become disconnected to the kind of realities we see in those big dense spreadsheets, then we feel uneasy about checking the box whenever it looks like there's... Having problems.

However, I think if we look at other large institutional accreditors, we're also going to see red boxes on those, so I wonder in the interest of not being unfair to a ACCSC, and being consistent as Jennifer emphasized, if there's not some avenue by which we can explore with the department of how we can come to grips with what I might call substantive compliance, in addition to the procedural compliance. Because it seems like what we're doing right now is ad hoc. We don't quite know what we're going to get in 18 months or how are we going to deal with it then. So I would be okay with the 18 months. If we could find a way forward with the department to actually work through this in a systematic way, I would be okay with the five years too if that's what the community wants to see.

Claude Pressnell: All right. Kathleen.

Kathleen Alioto: Okay. So I'm repeating myself, but that is more tied to 602.16, yada yada. That the 217 schools that are deferred, the 66 schools that are on warning, and the 63 schools on probation, that they came back to us with a concise report about what they are doing to help these schools turn around in 18 months. That would be my suggestion.

Claude Pressnell: Right, Jill.

Jill Derby: Well, I did want to comment that having served on the NACIQI now for almost nine years, there have been other occasions where we have made a similar kind of decision regarding an agency around which there's a great deal of controversy and discussion and uncertainty of how to proceed inside the tight confines of compliance requirements. And in some of those cases, as I recall, we have shortened the timeline and without necessarily identifying exactly the compliance issue, but indicating the concerns that have been raised by the committee.

And I think Kathleen has pointed to some of those as I think Bob Shireman has as well. But I know... My own position is, I can't see myself voting yes on five years, just because of the concerns that have been raised, the tale of two cities as it was called, leaves me very concerned, and certainly there's discussion we need to have about policy. And it's going to be a very good discussion, I can tell it already. But in the meantime, I know I couldn't vote yes on a five, but I could vote yes on an 18, with an indication of the area in which we're most concerned and want to hear more. Kathleen has pointed to that.

Claude Pressnell: All right. [Jennifer 05:56:21].

Jennifer Blum: I don't know where to begin to be honest with you. We're creating a record here by the way that talks a lot about policy, which is not the basis and the need for policy changes, which is not the basis on which we can make a decision about a particular agency. And we're building a record that actually hurts our processes. I'm going to start there as a lawyer, and then I'm going to continue to once again correct the record that Kathleen is incorrectly stating. There are not 200 and something schools currently having an action [inaudible 05:56:57] agency. The agency was clear about that. The record is clear about that. They have taken over the three years, sometimes pretty minor actions and sometimes pretty major actions against institutions. That to me is actually showing compliance with... Not non-compliance with 602.16.

                       So again, I'm very concerned about having a 18 month requirement on this agency, and then we're going to have long conversations about the same exact student achievement standard with every single other one when this one has been in compliance. To Jill's point about shortening, while I certainly understand that, and I agree with our ability to do that, but in this situation, the department... I think in many of those situations, the department itself starts flagging some things for us to look at. In this case, the department has flagged nothing for us to look at. And so we're creating an interpretation of non-compliance that is frankly new.

                       We're sort of saying, well, if you over... And Bob has raised this issue of enforcement, and I would say we're making an argument of, if you over enforce, we might find a compliance issue. To me, I just don't understand that argument. So I understand I... Whoever it was who suggested three years, I understand that the commission is not going to get five years probably, because some of us don't agree with that, but I also don't think it's 18 months. And so, I think we really better figure out a coherent, rational basis recommendation to make. And I think maybe it's three or four years, but then even then I think we need to be specific about why it's not five.

Claude Pressnell: All right. Steven. Steven, you still wanting to talk? Go ahead.

Steven VanAusdle: I'm looking at this, and I'm coming down with supporting Wally's three-year period of time. It's a big problem, it [inaudible 05:59:25] the last minute with some of the press that we've received, it's going to take some time to figure this out, but the department's role is going to be what agency roles can be addressing a very serious problem in our country right now. I think is a student achievement issue. I think we all have to own a little bit of that. And Jennifer, maybe you just cement my possession to a degree when you said three to four years. I think three years is generous, but it's giving the institution the benefit of the doubt in terms of the five-year period of time. And it gives us time to really do some research, working with the department to come up with an answer to this. So that's where I'm at right now. I would support three years. I will not support five years.

Claude Pressnell:	Okay. I got Herman. Herman, let's have you make your comments, and then if someone's wanting to modify the 18 months, you need to do in form of a motion to amend the motion that's on the table. But let's go ahead, Herman. Your comments before anything happens?
Herman Bounds:	Yeah. So I just want to talk a little about procedure. Under the new regulations in 602.32, it says that an agency has to submit their petition for recognition 24 months prior to the expiration date. I shouldn't be talking about what, what you all will recommend, that's outside of scope, but they couldn't do that in 18 months and be in compliance with our regulations. Because, and then I have to give them... I have to send notifications out probably somewhere between six or seven months prior to them submitting. So we can't. I mean the 18 months would be contrary to our own regulations. So I just wanted to point that out.
	The other thing too is the thing to remember is that, under the new regulations, the agency would be responding to, without definite areas of non-compliance all 105 new regulations. So it would not be just a short report, they would have to respond to everything. So within that practicality, I think that should come into whatever you all recommend, but 18 months would be contrary to the regulatory requirements of a 602.32.
Claude Pressnell:	Thank you, Herman. Is anyone wanting to make an amendment motion?
Speaker 17:	[inaudible 06:02:15] for clarification. Looking at what the sample language is, it looks like if we would just have without a report, a special report. If we would just recommend it be approved... Be recognized for a certain number of years, that implies full compliance with the criteria. So I think that's the question. Is there something between full compliance with the criteria for however many years, or if it's less than five years, you would have to say that the compliance report or a monitoring report. I don't know if we can just say three years, and understand that that means full compliance.
Claude Pressnell:	The motion right now is continued recognition, with the idea of [inaudible 06:03:04]. The only adjustment is from five years down to three.
Speaker 17:	And I guess... So then they would have about a year to give us another full report that they have to turn in two years before that three year period is over. And the question is, is that reasonable, and what's going to change? But, I don't know.
Claude Pressnell:	All right. We've got a big list up here still, and this is... We're going to have to bring some closure to this. And so Bob, your comment.
Bob Shireman:	Yeah. I mean, you pointed out Claude that the regulations have some suggested motions, but that anything goes beyond that basically. Those were just examples. My thinking on just doing the 18 months is the department of education... The final decision is made by the senior department official, or the

almost... The penultimate decision anyway, is made by the senior department official. They can review the transcripts, their staff are listening to this re presumably, and could end up doing a three year or could end up doing a compliance review, or something else.

That's kind of my thinking about not attempting here to come up with precisely what the in-between might be, a compliance report. I could see adding something that basically says that we recommend that the secretary renew for 18 months, or that the secretary review the record of our discussion and determine an appropriate compliance review, which would make it clear that we are asking them to review what we came up with. I'm open to thought, I'm not necessarily making that adjustment. I guess I'm kind of opening up the idea of being a bit more nuanced in a recommendation, which it sounds like we are allowed to be if we want to be.

Claude Pressnell: Yeah, just a couple of observations. One, the 18 months, to Herman's point, as is recommending something that's in conflict with federal policy on recognition, because he said they have to have that 24 month notice. And the other is, whatever we do the SDO is going to do whatever they want to do with this anyway. So I mean, I think that if we make a recommendation, we ought to at least do it within the parameters of reality. It's really clear that we've got serious concerns, or that the committee has serious concerns about the agency.

But also, they've been evaluated based on the cards that have been dealt. These are the criteria, and unless we can identify a criterion or criteria that they're in violation of, then I would encourage you not to go against the recommendation from the staff. But where we are right now is we have a motion on the floor. [crosstalk 06:07:03]. I'm sorry?

George Alan Smith: That has been seconded.

Claude Pressnell: Yes, that has been moved in second. We have a motion, an active motion that says the agency recommends to renew for 18 months. And so any other comments about the motion? And let's see, I think Wally was up next and then Jill.

Wallace Boston: Yeah.. I thought that we had an interesting comment regarding asking for a special report. So if we think about there are a number of people who are not comfortable with a five-year recommendation. If we think about a three year renewal, I... What I don't know the answer to is, since we heard from Herman that you have to submit your materials 24 months, or maybe you have to give notice 24 months in advance, whatever that requirement is, could we ask for the interim report 18 months from now?

Claude Pressnell: Just point of clarification, what would the interim report look like?

Wallace Boston:	I think what I heard someone ask was an explanation as to why the numbers of institutions over the three-year period that were in and out of various stages of non-compliance, why that number was so high.
Claude Pressnell:	And so that's going to be [inaudible 06:08:56] which criteria?
Wallace Boston:	It was Kathleen's suggestion. I thought it was tied to student achievement.
Claude Pressnell:	Okay. Jennifer.
Jennifer Blum:	I have a question just to follow up on what Wally just said. And again, full disclosure, I mean, obviously there are thousands of pages of records, and so I apologize to the department staff if I'm sort of asking a question you can't answer on the spot. But did the agency speak to in its filings about why there are, what the categories of actions and why they were taken? Maybe not by school, by school, but in some form or fashion, so that we're not asking for something that might already be in the record.
Wallace Boston:	Excuse me. Is that for me to answer?
Jennifer Blum:	Or Reha or someone in the department who would do the staff review. So yes, I mean, do we know... Yeah. Before we go asking the agency for something that they may have already provided... Do you see what I'm saying?
Wallace Boston:	Well, it's not... All those actions wouldn't be provided in the petition for recognition. Under 602.26, the agency has to report their actions, and they report that into the database of accredited institution programs. So there's some of that information maybe there, but I don't know how in-depth that information would be. I mean, we normally consider an agency to take [inaudible 06:10:47] against the agency, is following their policies and holding schools to whatever their standards are.

[inaudible 06:10:56] playback again, real quick. I won't take up much time [inaudible 06:10:59] when it's 24 months. It talks about, they will provide the petition for [inaudible 06:11:06] 24 months prior to the expiration of their recognition period. So again, they could meet that regulatory requirement, and it might give the agency... That would probably give the agency some due process abilities regarding a requirement. 24 months is pretty clear anyway, in the new regulations. But Jennifer, to answer your question, some of that stuff might be in our data system, but it's not. So all of those actions, they're not within the petition for recognition. Sorry, if I mumbled that a little bit. |
| Jennifer Blum: | You raise a good point. I mean, a number of those actions are required by regulation. The agency is required to notify the department, the department is sort of already aware of actions taken when an agency takes certain actions, they are required to notify the department. So I assume that at a certain level, the agency staff, when they become aware [06:12:13] becomes part of the |

department's consideration of an agency. I just [inaudible 06:12:20] duplicate is my point. I require a [inaudible 06:12:24] report on something that already may exist within the department's purview.

I'm not against it necessarily. I'm just trying to be focused on that. And then the other thing I would say, and I'll just reiterate it is, if you take an action on an agency because it's very, very active, I'm not sure what [inaudible 06:12:51] policy, but what precedent we're creating in terms of the credit patient behavior for their future, because the application is, if you take lots of lots of action, you might get slapped with a compliance reports. So it seems just counter to me. But again, I know it's in the interest of figuring out a solution. I'll consider solutions, I just wanted to point that out as well.

Claude Pressnell: Right. And I think that's a good point that you're making there, Jennifer, just simply because a lot of the concerns is that they're not taking enough action in some institutions. And what I'm trying to do here, just so you know the position of [inaudible 06:13:36], I'm trying to get a motion that everyone is pulling [inaudible 06:13:40]. If we voted on the five-year extension it would be defeated, and so we'd have to come back and get another motion anyway. So the motion on the table right now that is available for us to consider is again, the recommended renewal for 18 months.

Claude Pressnell: There's renewal for 18 months, but I've also heard a desire to move it to three years. I would entertain a motion to amend. Is there anyone who wants to move to that? Yes.

Bob Shireman: I just wanted to offer that rather than a motion to amendment that then requires a vote or whatever else, I am prepared, if my secondary is willing to go along, to amend my motion, and I put this in the chat, to command a renewal for three years with a compliance report in 18 months with regard to issues raised in the advisory committee discussion. We could list criteria, but it does seems better to be ... to allow the SDO to maybe identify what, what some of those are so we don't get some wrong. So again, I'm open to make that change, but I think I cannot do that just by myself.

Jill Derby: And [Claude?], I'm the person that seconded that motion and I would support the change in the motion. I think there's a good consensus around the three years, and I think that's how we could move forward here, but I would support what Bob has just laid out.

Donna Mangold: This is Donna Mangold. If I may speak for a minute.

Claude Pressnell: Yes.

Donna Mangold: If we do a compliance ... If you do a compliance report under the regulations under 60234G a compliance report is limited to 12 months. However, in the case of ... if you find exceptional circumstances and good cause you can

continue recognition for period of ... you can continue recognition for a specified period in excess of 18 ... in excess of 12 months pending submission of a compliance report. So you have to make some sort of preliminary statements to get to 18 months. Just in terms of protecting the record of your motion?

Claude Pressnell: So [crosstalk 06:16:11]

Bob Shireman: So, is it easiest to just say 12 months and then compliance report in 12 months, and then obviously the SDO can make adjustments if that's necessary? It sounds complicated to me what you're ... to have to do the stating.

Donna Mangold: Yeah. The SDO always has the power to make the decision and takes into consideration your recommendation, the staff recommendation. But I just ... I didn't want to set up 18 months without clarifying.

Bob Shireman: Okay, that's helpful. So I guess it makes sense to recommend a renewal for three years and a compliance report in 12 months with regard to the issues raised in the advisory committee discussion.

Claude Pressnell: Can that motion be made without identifying specifically the criteria? Your words.

Donna Mangold: This is Donna. I think that, again, the nature of your recommendation, if you don't identify the areas of compliance, makes it a little bit more complicated for the SDO to accept it.

Claude Pressnell: It has been kicked around, the student performance piece, but I've got to be honest with you, you're all struggling with trying to find out exactly where they're not compliant. You know. I mean, Kathleen. You're muted, Kathleen.

Bob Shireman: And could you just settle for the three years [crosstalk 06:17:58].

Kathleen Alioto: I don't know. I guess I need to learn to clarify myself more, but I took it straight from their report on 1602.16, that they had 118 schools in initial accreditation 418 renewal 217, deferred or continued deferral. Sixty-six schools onboarding, 63 schools on probation, 36 schools denied. It's the 346 schools that I'm squawking about. That is what the focus of their reporting could be, and they're such a charming group of people, but if they could give us really the hard procedures that these schools can follow ... you know, they have so many procedures in this report and the procedures in regards to each of these as well.

                      So, I'm not saying that it's just out there. I'm saying that student achievement, by their own word, is not being nurtured.

Claude Pressnell: Jennifer?

Jennifer Blum:	Yeah, let me respond to that again. So first of all, that many schools currently have action, some of those are past. You included the initial recognition ... I mean, initial accreditation, which of course is not an adverse action in any sort. It's schools that are seeking accreditation for the first time, so let's take those ones off the table together because those aren't problems. There are no problems. You can go onto their website and probably bind action reports, Kathleen, if you really want to do that. I'm sure the department has taken a look. As I said, the department has information on all of the adverse actions that any agency takes. So I want to go back to the ... I just don't think that's the basis because again, to Claude, I think sort of seconded something I said. That's showing compliance actually with the students, with the requirements of the criteria, not non-compliance.

So I want to go back to the motions. I'm uncomfortable with a compliance report and the three years. I'm particularly concerned about a compliance, and I think Donna spoke to this, from a legal standpoint. I'm really concerned about a compliance report that's not tied to a very specific expectation of what we would anticipate in that compliance report. I happen to think that that opens the department, even, and I know there's been a lot of conversation about the SDO. The SDO actually ... well, they have the authority to do whatever the heck they want. It has to have a pass. It can't be arbitrary. It has to be rational basis, and so I think leaving everything just willy-nilly up to the SDO is us not doing our jobs at all, and so I feel like they might as well just not have a [inaudible 06:21:20] if that's going to be sort of our attitude.

So I think unless we can demonstrate a specific ask in a compliance report, and I personally cannot, I don't support a compliance report. I would ... and I know might be in the minority. I would support five years, but if we're not going to support five years, that's what we support. I would like to do four, but I'll go along with probably the flow on three, but not with a compliance report. And I'm happy to make a motion to amend the initial motion. I think that would just cross off ... you know, I think it's just a substitute of time from the five-year to the ... the department's motion. I can take the motion that's been seconded, I suppose, and rewrite that to be a pure three year. |
Claude Pressnell:	Okay, are you making that motion?
Jennifer Blum:	I mean, are there other hands up? I'd want to actually [crosstalk 06:22:19].
Claude Pressnell:	Soon enough. You'll find out soon enough.
Jennifer Blum:	Sure. I've never done a motion, so ... and I'm a little hesitant actually to be the one making that motion because I would support five. So I'm always ...
Speaker 19:	You already have a motion on the floor, so that might be what they call a friendly amendment. Sounds like what you're saying is that you would like to

see three years versus three years and this compliance report regardless of how long it would have lasted. Is that what I hear you saying, Jennifer?

Jennifer Blum: Well, for the record ... nothing's really formal. For the record, I'd like to see five years in the ...

George Alan Smith: Right. Right. Exactly. But within this motion.

Jennifer Blum: Within this motion.

George Alan Smith: Within this motion, it would seem like Bob or Jill would have to agree to just making it a blanket three years.

Jennifer Blum: I would strike through mine then. Yeah.

George Alan Smith: And then at some point I think it probably would be a good idea to just vote on something and if it fails we can move onto yet another motion.

Jennifer Blum: Yes, strike the compliance report reference. So I move to strike the reference to compliance report. Is that a ...

Claude Pressnell: Okay. Well, right now the recommendation is to renew for 18 months. What [crosstalk 06:23:34].

Jennifer Blum: That's what I thought. That's why I was ...

Jill Derby: That's already been a friendly amendment, that modify to three years.

Jennifer Blum: Yeah, that's what I thought.

George Alan Smith: Exactly. [crosstalk 06:23:43].

Claude Pressnell: I'm reading what's on the board. So let's please adjust the recommendation to what we are currently ...

George Alan Smith: Okay.

Claude Pressnell: The current recommendation is recommended renewal for three years.

George Alan Smith: It is. And then it was with the compliance report within a 12 month period.

Claude Pressnell: Okay, so go ahead and put that on there. And then Jennifer's making the amendment that will strike the compliance report.

George Alan Smith: Right.

Claude Pressnell:	So, what we're going to do now is we're going to vote on the amendment to strike the submission of a compliance report.
Speaker 19:	Or not. But rather friendly amendment from Jennifer, and then I think Bob and ... go ahead.
Claude Pressnell:	If it was a friendly amendment then we don't need to vote on the amendment. So does Bob and Jill consider that a friendly amendment to strike to compliance?
Bob Shireman:	I'm kind of with the let's vote on something. And so if Jennifer wants to have a vote on eliminating the compliance report, that's fine, and if the compliance report gets eliminated, we're left at the three years, and you can affirm that. So I think we've made enough changes in emotion. Let's go with it as stated right now, and if Jennifer wants to ask for a vote on an amendment to delete the compliance report, that's fine.
Claude Pressnell:	Okay. Well, she's made the motion to strike amendments. So what we're voting on ... Just to be clear, what we're voting on right now is yes to strike the submission of a compliance report. No means you retain the submission of a compliance report. So we're voting on Jennifer's amendment to the motion.
Bob Shireman:	We should wait and vote until the screen reflects what we're actually voting on.
Claude Pressnell:	Mine does.
Bob Shireman:	Oh.
Claude Pressnell:	Does yours not?
Jennifer Blum:	No.
Bob Shireman:	Submission to strike.
George Alan Smith:	No.
Donna Mangold:	Yeah, I'm confused.
George Alan Smith:	Jennifer doesn't want a compliance report. And it sounds like that Bob is very much open to striking the compliance report and recommends the renewal of an agency for three years. So I don't think [crosstalk 06:26:11].
Roslyn Clark Artis:	That is not what Bob said.
Claude Pressnell:	No, that's not what Bob said. Bob voted on the amendment. So we're voting on Jennifer's amendment right now. Here's what we're going to do. We're going to vote on Jennifer's amendment to strike the submission of a compliance report.

	That's what we're going to vote on. So yes, is to strike the submission. No, is to retain the submission. We'll do it by a voice vote. And I'll do a roll call, but you say yay or nay. So, Kathleen.
Kathleen Alioto:	This is on her ...
Donna Mangold:	On the amendment.
Claude Pressnell:	This is the amendment to the motion, and the amendment to the motion is to strike the submission of a compliance report.
Kathleen Alioto:	No.
Claude Pressnell:	Okay. Roslyn?
Roslyn Clark Artis:	Yes.
Claude Pressnell:	Jennifer?
Jennifer Blum:	Yes.
Claude Pressnell:	Ronnie?
Ronnie Booth:	No.
Claude Pressnell:	Wally?
Wallace Boston:	Yes.
Claude Pressnell:	Jill?
Jill Derby:	No.
Claude Pressnell:	David?
David Eubanks:	Yes.
Claude Pressnell:	Molly?
Molly Hall-Martin:	Yes.
Claude Pressnell:	Is that a yes?
Molly Hall-Martin:	That was a yes.
Claude Pressnell:	Okay. Paul?

Paul LeBlanc:	No.
Claude Pressnell:	Michael? Is he here?
George Alan Smith:	No, he's not here.
Claude Pressnell:	Okay. Robert?
Robert Mayes:	Yes.
Claude Pressnell:	And Bob?
Bob Shireman:	No.
Claude Pressnell:	Steven?
Steven VanAusdle:	Yes.
Claude Pressnell:	According to my count the yeses have it. So the submission of the compliance report will be stricken. Now, we're back on the original motion, which is recommendation of renewal for three years. Any further discussion? I see hands up, so I'll go to the hands up. Rosalyn? Okay, I can't hear her. We'll go to Jill. Okay, Jill?
Jill Derby:	No, I lowered my hand.
Claude Pressnell:	All right, thank you. No further discussion then let's go ahead. We'll take a vote on the motion to recommend renewal for three years. Kathleen?
Kathleen Alioto:	Yes.
Claude Pressnell:	Roslyn?
Roslyn Clark Artis:	Yes.
Claude Pressnell:	Jennifer?
Jennifer Blum:	Well, if this is the only choice then yes.
Claude Pressnell:	You can always vote no.
George Alan Smith:	Well, it's not.
Jennifer Blum:	Well, that's what I want to understand. I guess I have a question I was hesitant to ask.

Claude Pressnell:	Well, I'm sorry. We're in the midst of taking a vote.
Jennifer Blum:	Okay, well then I'll vote ... I guess I'll vote no, because I think it should be five years.
Claude Pressnell:	Okay. Ronnie?
Ronnie Booth:	No.
Claude Pressnell:	Wally?
Wallace Boston:	Yes.
Claude Pressnell:	David? David? Molly?
Molly Hall-Martin:	Yes.
Claude Pressnell:	Paul?
Paul LeBlanc:	Yes.
Claude Pressnell:	And Michael is absent. Robert?
Robert Mayes:	No.
Claude Pressnell:	Mary Ellen? Mary Ellen?
Mary Ellen Petrisko:	Yes. I said yes. I guess I'm going to vote yes for three.
Claude Pressnell:	Yes. Okay. Robert ... or Bob?
Bob Shireman:	Yes.
Claude Pressnell:	And Steven.
Steven VanAusdle:	Yes.
Claude Pressnell:	All right, the motion passes. Thank you all very much. We'll get Art back on the phone.
George Alan Smith:	Yeah, I'll give him a holler. Thank you very much, Claude.
Claude Pressnell:	Yeah.
George Alan Smith:	Tough job, but a good one.
Claude Pressnell:	I don't know. May not be voted in as vice chair again.

Bob Shireman:	Mr. Chairman, do you think we have five minutes, two minutes?
Donna Mangold:	For a break.
Bob Shireman:	Yeah, an estimate?
Claude Pressnell:	We do. I'd say five minutes. So, I've got a 38 minutes after the hour. Let's go 45. We'll give ourselves a little bit more. A seven minute break.
Kathleen Alioto:	Claude, thank you so much. And leadership.
	(Silence).
Arthur Keiser:	Well, welcome back everybody. Is that me? No. Okay, welcome back everyone. We have one more agency to do today and I would like to recognize our two primary readers, Ronnie Booth, and Jennifer Bloom. If you would go ahead and introduce the agency.
Ronnie Booth:	Okay. Thanks, Art. Appreciate it. We are reviewing the accrediting bureau of health education schools, and I'll read their current scope of recognition. Your accreditation of privates per secondary institutions in the United States offering predominantly allied health education programs, leading to a certificate, diploma, and degrees at the level of associate applied science, associate of occupational science, academic associate baccalaureate, and masters, including those offered to be a distance education and the programmatic accreditation with medical assisting, medical laboratory technology, and surgical technology programs through the associate degree, including those all through distance education. The scope expands to the substantive change committee jointly with the commission for decision on substantive change.
	So Elizabeth, I believe you're there somewhere.
Arthur Keiser:	Yeah. Well the departmental staff is Elizabeth Doggett. Elizabeth, you're up.
Elizabeth Daggett:	Okay, thank you. Can you hear me?
Ronnie Booth:	Yep.
Elizabeth Daggett:	Okay. Good afternoon, Mr. Chair and members of the committee. My name is Elizabeth Daggett and I am providing a summary of the review of the petition for renewal of recognition for the agency ABHES. The staff recommendation to the senior department official for this agency is to renew the agency's recognition for a period of five years. The secretary's recognition of the agency enables its accredited institutions to seek eligibility to participate in student financial assistance programs administered by the department of education, under title four of the Higher Education Act of 1965 as amended. Consequently,

the agency must meet the separate and independent requirements established in the regulation.

Our recommendation is based on our review of the agency's petition and its supporting documentation, as well as the observation of an accreditation training session in September 2020, a virtual file review in November 2020, and a virtual commission meeting in January 2021. Our review of the agency's petition found that the agency is in compliance with the secretary's criteria for recognition. The department received no complaints regarding this agency during the recognition period and received no third party comments during this review. 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. There are representatives of the agency here to answer your questions. Thank you.

Ronnie Booth: Okay, I guess you want to call on those individuals.

Arthur Keiser: I'm sorry. I didn't mute myself ... unmute myself. I want to recognize for the agency India Tips the executive director of ABHES. Amy Rowe, the associate executive director of membership services for ABHES. Dr. Thomas Kenny chairperson of ABHES, and Julie Micelli office managing partner of Husch Blackwell, LLP.

India, you're on?

India Tips: I am. Good afternoon. My apologies. Good afternoon. My name is India Tips and I'm the executive director of the Accrediting Bureau of Health Education School. I am joined here today by Dr. Thomas Kenny, FS chair, and Ms. Amy Rowe, associate executive director of membership services. We would like to thank you for the opportunity to appear before you today and agree with the department's recommendation for re-recognition ABHES has been recognized by the U S department of education continuously since 1969. The petition and exhibits that you have before you today represent many months of study and work on behalf of the ABHES commission, staff, and volunteers. The department stats analysis of our work was very thorough and we appreciate the technical assistance provided by staff members, Valerie Lefer and Elizabeth Daggett. We also value [inaudible 06:43:56] review and consideration. We understand the important work you do and appreciate your investment of time and thought in the recognition process.

I would first like to start by providing you a few details regarding my background. I've been with ABHES for 26 years and began ... and became its executive director in 2018. I bring the perspective of someone who understands the many facets of accreditation, having served in a variety of roles. For most of my years with ABHES, in addition to other responsibilities, I coordinated and participated at staff during onsite visits to initial and accredited institutions. In addition, I have led training workshops for institutions and peer evaluators on ABHES standards, worked with many of the commissioners policy committees

and have served as a director managing a number of ABHES's review processes, including for substance of change. Since assuming my role as executive director, I've been focused on preparing for ABHES's re-recognition and supporting the process of incorporating new department of education regulations into ABHES accreditation standards and policies.

As was notified in July 2019 that its recognition petition would be due on February 1st, 2020. At the same time, the department was engaged and its process of negotiated rulemaking that resulted in new recognition criteria that became effective in July 2020. We were instructed by the department to submit ABHES's petition under the petition ... under the criteria in place in 2019, but ABHES nevertheless moved quickly to incorporate the new criteria into its standards, policies, and procedures. Similarly, ABHES has incorporated relevant provisions of the new distance education regulations into its accreditation manual, including the new definitions of regular and substantive interaction and the disclosure requirements for licensure and certification. ABHES believes that these provisions enhance the quality of distance education and provide added measures for protecting the interests of students.

I would now like to provide some important background information on ABHES. ABHES is somewhat of a ... somewhat of a unique agency and that it accredits both institutions and program, and specializes in the accreditation of health education. As a result, ABHES's model of accreditation evaluates effectiveness at both the institution and program level. Currently ABHES accredits 408 institutions holding institutional or programmatic accreditation, which represents 1,839 active programs. Of the active programs, 1085 are offered at the non-degree level, 589 award associates degrees, 130 award bachelor's degrees, and 35 award master's degrees. It is also worth noting that of the 35 master's degree programs, the vast majority of those programs award a master's degree in nursing, and all but eight of the 35 master's degree programs are in the health field.

The remainder of my presentation will focus on four key issues relative to ABHES's response to the COVID-19 pandemic, it's measured growth relative to the master's degree expansion, ABHES's student achievement benchmarks, and finally its investment in diversity, equity, and inclusion. Like all in higher education in early 2020 ABHES and its institutions and students were confronted with the pandemic. ABHES responded very quickly to support its institutions and programs as they made important adjustments intended to minimize the disruption of their student's education. ABHES has been in regular communication with its accredited institutions and programs, relaying the latest information from the department of education, certifying bodies, state licensing authorities, including executive order ...

India Tips: Certifying bodies, state licensing authorities, including executive orders, especially at the onset of the pandemic.

Our goal has been to provide a measure of flexibility and at the same time assure that graduates of [inaudible 06:48:12] accredited programs continue to be prepared to become professionally licensed or certified and employed in the professional field.

Between the assets reporting period, July 1, 2019 and June 30, 2020, [inaudible 06:48:28] institutions and programs graduated 52,691 students in health education programs and placed 77% of those graduates in healthcare professional disciplines, including in such fields as nursing, respiratory therapy, EMT, paramedic, and radiography, all fields in a high demand during the heart of the pandemic.

Throughout the pandemic, [inaudible 06:48:53] has made it a priority to continue its accreditation reviews, quickly adapting to a web-based site visit format in which evaluations could be conducted while the health and safety of evaluators, students, program administrators, and faculty were respected. [inaudible 06:49:09] has conducted 110 virtual site visits since August of 2020 for initial and renewal applicant institutions, as well as 45 verification visits, evaluating substantive changes.

In addition, a number of [inaudible 06:49:24] institutions moved to distance education or web-enhanced formats in order to avoid disruption to students under temporary approval by the department. At the onset of the pandemic in March of 2020, [inaudible 06:49:37] has provided schools blanketed temporary approval that allowed institutions and programs to transition coursework from residential to blended or full distance education delivery through June 1 of 2020. Programs with a clinical experience, also known as externships, were required to continue to demonstrate that students complete their coursework as a basis for program completion in compliance with applicable federal, state, and credentialing requirements. The commission continued to require institutions to demonstrate that students had met the program competencies for entry level employment prior to program completion.

Given the clinical nature of health education programs, institutions, and programs that intended to continue offering temporary distance education methods beyond June 2020 were required to submit important details regarding its methodologies. Upon review on approval of their submissions, [inaudible 06:50:33] has permitted continued temporary distance education through December 31, 2020. Any institution wanting to offer continued temporary distance education beyond that point were required to submit formal distance education applications. This was to assure the quality of the distance education, notwithstanding the department's flexibility.

Through the pandemic, we are now seeing more programs exploring ways to broaden access more generally to fulfill workforce needs. [inaudible 06:51:06] goal is to support their exploration, and at the same time, maintain the standards and quality of accredited educational programs in the healthcare disciplines.

I would now like to reflect upon our master's degree expansion of scope, which occurred in 2017. At that time, [inaudible 06:51:23] announced its expansion plans to move judiciously into the expansion, and in reflection, we did exactly what we said we were going to do. During our last appearance before [inaudible 06:51:33], there were some advisory committee members who expressed interest in understanding [inaudible 06:51:38] capacity to properly support the evaluation of master's degrees. There were also questions regarding [inaudible 06:51:46] resources and whether its evaluators and decision makers were properly credentialed and experienced, and I can confirm that they were.

[inaudible 06:51:56] expansion planning started in 2016 with a pilot committee comprised of five educators, two holding EDDs, one a PhD, and two holding Doctor of Nurse Practice degrees. The committee conducted research that supported the development of [inaudible 06:52:13] master degree standards and ensured alignment of those standards with other department-recognized accreditors. Since expanding its scope, [inaudible 06:52:22] has been strategic in bringing additional resources into the evaluation process for master's degree programs. While master's degrees represent less than 2% of [inaudible 06:52:34] portfolio programs, we have expanded the number of commissioners with graduate degrees in that nine of the 15 board members hold master's degrees, with five holding doctoral degrees.

Today, [inaudible 06:52:47] has 115 volunteer evaluators with master's degrees, 53 who hold both master's and PhDs. Every new master's degree application must go through [inaudible 06:52:58] of change process, which requires review and approval by the commission's sub change committee. The commission is diligent about ensuring its committee assignments, including the members of the substantive change committee, have the appropriate credentials, qualifications, and experience to effectively evaluate new master's degree programs. [inaudible 06:53:19] also requires a site visit to be conducted for new master's degree programs, which exceeds the department's requirements.

The third topic of my presentation involves student achievement indicators, which are an important part of [inaudible 06:53:34] accreditation process. The commission has set benchmarks for retention, licensure certification, and employment all at 70%. It evaluates every program against these benchmarks every year. Programs that do not meet the benchmarks are given a period of time to improve not to exceed two years. [inaudible 06:53:57] does not intend to expand the two year maximum timeframe, even though the 2020 recognition criteria would permit a longer timeframe.

An institution that is not able to meet program benchmarks is subject to sanction in the form of a program-specific warning or show cause. Institutions with poor performing programs may lose its approval to operate the program and thus be required to teach it out. [inaudible 06:54:31] considers 70% to be a starting point for assessment and approvement of programs with the goal that institutions and programs will strive to and will exceed the 70% benchmark. We also understand the practices in outcomes assessment are evolving as better

data about student performance, both in school and after graduation, becomes more accessible. Outcomes assessment is an important feature of maintaining [inaudible 06:55:02] accreditation with its groundings in the standards and a reporting and monitoring architecture through which institutions and programs are held accountable for student achievement.

In addition to outcomes assessment, [inaudible 06:55:17] has incorporated other features into its accreditation process that allow for close monitoring of accredited institutions and programs. [inaudible 06:55:26] institutions that undergo substantive changes such as adding an additional location must undergo two site visits, one within six months, and another within 24 months after the substantive change has been fully implemented. New programs that represent a significant departure are also required to undergo a site visit with a subject matter specialist.

The commission also takes into consideration important factors when determining the length of new grants of accreditation. The maximum grant [inaudible 06:55:59] for an accredited institution is six years, and three years for an initial applicant. The commission may award shorter grants based on factors including an institution's compliance track record, the quality of its submissions, and success with respect to fiscal and student achievement indicators. A full six-year grant reflects the commission's confidence in an institution's ability to sustain compliance with the standards over time, but compliance is also monitored annually through the annual report and other financial reporting.

Finally, when speaking about [inaudible 06:56:37] institutions and its accreditation standards, it is also important to describe who we are as an organization. Our mission is to serve as a nationally recognized accrediting agency of institutions, predominantly providing health education and programmatic accreditation in specific health education disciplines. To further this mission, [inaudible 06:57:00] believes that a commitment to diversity, equity, and inclusion is essential to a well-educated healthcare workforce.

[inaudible 06:57:09] engaged [inaudible 06:57:10] and the higher education team of Husch Blackwell, who have deep experience in this sector to support our progression in this area. Most recently, the [inaudible 06:57:21] commission adopted a statement on a bond diversity, equity, and inclusion. [inaudible 06:57:26] is dedicated to continuing to evaluate its own governance, standards, and operations to ensure that our commitment manifests itself in all of the organization's work and decisions.

I would now like to ask Dr. Kenney, commission chair, to offer some additional introductory remarks.

Thomas Kenny: Good afternoon, everyone. Thank you so much, Ms. [inaudible 06:57:51], for your introduction, and to all of you who serve on the committee for giving me the opportunity to speak with you today. It is truly an honor to be here.

My name is Dr. Thomas Kenny, and I'm the chief compliance officer at Northwest Career College in Las Vegas, Nevada. I'm a dentist by profession, but I've spent much of my professional career in higher education. I started working as a school administrator over a decade ago, prior to becoming a teacher, and then a program chair, and ultimately moving into campus leadership in 2015. That said, it is my distinct privilege to speak with you today in my capacity as the chair of the [inaudible 06:58:29] commission. I have served on the [inaudible 06:58:32] commission since 2017, and I am incredibly proud to serve with other educators, healthcare practitioners, and board members representing the public interest, who value the role of accreditation in setting standards for health education programs designed to prepare students for the workforce.

Prior to becoming chair, I served as the secretary on the commission's executive committee, and I also chaired a number of subcommittees and working groups tasked with helping [inaudible 06:59:01] to update its standards and policies to align with the new Department of Education regulations that became effective on July 1 of 2020, and July 1 of this year.

As a licensed dentist, I appreciate that [inaudible 06:59:15] standards require the involvement of the employment community in the development of curriculum and the evaluation of programs. I can speak from personal experience, working both as a practitioner and in affiliated clinical science, and as a program chair teaching in a classroom setting, how critical employer input is to the success of the programs and institutions accredited by [inaudible 06:59:37]. It assures that students receive relevant instruction that is continually updated to meet contemporary workforce needs. The effectiveness of programs is tested in [inaudible 06:59:48] focus on student achievement outcomes, which require programs to continually assess their own performance against established benchmarks for retention, licensure, certification, and employment rates of their students and graduates.

On a broader level, the [inaudible 07:00:05] commission takes its governance responsibility seriously in the selection, orientation, and professional development of its commissioners, as well as faithfulness to administering policies that protects the integrity of the decision making process, including those that guard against conflicts of interest.

The commissioners are an amazing group of individuals, and each of them is interested in having a variety of perspectives represented in their deliberations on policy and standards, as well as on accreditation decisions. We recognize the value of diversity of thoughts around these important institutions, and our commitment to these values is reflected in the composition of the commission, which includes educators and practitioners mentioned previously, as well as public members whose diverse backgrounds and professional experience span areas such as medical accreditation expertise, federal regulatory experience, and connections to the workforce communities that [inaudible 07:01:01] serves.

Many of the commissioners have professional experience in the health fields of nursing, surgical technology, medical assisting, and others. Several commissioners have expertise in distance education, and routinely provide valuable insights into innovation that seek to broaden access and enhance quality for our students. As chair, I rely on this variety of experiences, particularly the points of view of our public members, to help guide the work of the commission and its committees.

Notably, several commissioners participated on the front lines during the heart of the pandemic, working with programs and institutions accredited by [inaudible 07:01:41] to help them navigate this unprecedented crisis. They used their experience to help those programs and institutions make adjustments needed to maintain operations in the height of the pandemic, whether it was by assisting students, teachers, and administrators successfully transition to distance and blended learning, or by providing guidance to students and employers on how to safely facilitate clinical experiences at a time when many healthcare facilities were shut down or operating under severe restrictions. These individuals remained focused on maintaining the quality of the educational experience while ensuring that the students impacted by the pandemic could continue to pursue their dreams to serve in their chosen profession.

I also think it is important to acknowledge the impact of the pandemic on [inaudible 07:02:29] operations. While many components of normal operations were quickly transitioned to a virtual format, it was a heartbreaking decision when [inaudible 07:02:37] decided to cancel its annual conference earlier this year. For many of us, this event is one of the highlights of the year. Its programs and learning tracks offer something for everyone, and the speakers who are selected each year to present bring an incredible depth of industry knowledge about higher education, workforce trends, and emerging technology trials. The sessions offered at the conference play a critical role in helping [inaudible 07:03:04] commissioners, staff, committee members, volunteer evaluators, and the institutions accredited by [inaudible 07:03:12] to stay abreast of current events, federal policy, and much more. We could not be more excited that it is officially back on the schedule for 2022.

Beyond the conference, [inaudible 07:03:24] has always had a strong commitment to continuous improvement and professional development, especially at the commissioner level. As chair, I believe strongly that it is essential to ensuring the effectiveness and integrity of our decision-making process. Since joining the commission, I have been impressed with the consistent focus that has been placed on providing training to commissioners every step of the way. It begins with new commissioner orientation and training conducted prior to attendance at the first meeting to ensure that we are prepared to contribute from day one, but it spans much further than that. It includes annual in-service trainings about new or proposed changes to standards or commission operations, regular reminders about the appropriate management and disclosure of potential conflicts of interest, and committee

level training to ensure that each commissioner is equipped to serve in the various capacities assigned to them each year.

Furthermore, as Ms. [inaudible 07:04:20] mentioned in her opening statement, we have made it a priority as a commission to support the full integration of [inaudible 07:04:27] statement on diversity, equity, and inclusion into our governance practices and [inaudible 07:04:32] standards and policies. At our commission meeting earlier this month, I charged every committee chair and [inaudible 07:04:40] staff member to reflect on the statement and how it can be integrated into the various committees' work and priorities as they consider their agendas for the new fiscal year. I expect robust discussion regarding these efforts to continue over the coming months and years at the staff, committee, and commission level. This commitment, together with [inaudible 07:05:02] focus on accountability at the board level within our cadre of volunteers, staff, and accredited institutions, will guide the work of the commission now and into the future.

In conclusion, on behalf of my fellow commissioners, I want to thank the department staff for their final analysis of our petition. We are deeply grateful for their hard work in preparing for this meeting. I also want to thank the committee members who will be participating today in the review of [inaudible 07:05:31] petition. We appreciate your time, attention, and consideration. Thank you.

Amy Rowe: Hi, we're having some technical problems with India. She seems to have lost her connection, so we were wondering if it would be possible to pause for just a moment before questions?

Arthur Keiser: We're on a pretty tight timeline. How long is she going to be?

Speaker 22:   She just worked in to log back in, either via phone or on the connection she has.

Candace Evans: We'll keep an eye out for her.

Speaker 22:   Can the host message me? I think what we need is a conference line. If one's connected to this so she can call in via phone.

Arthur Keiser: It's listed on the agenda.

Speaker 22:   Okay. Just one moment. Thank you.

Arthur Keiser: Candace, do you see her at all?

Candace Evans: Not yet, but it will take probably just about a minute if she's just calling in now.

Speaker 22:	We're going to try this, because she's saying that she has no control of the computer right now and that something's just overtaken it. Let's see if by chance she's able to talk through here.
Arthur Keiser:	Okay, well-
Speaker 22:	[crosstalk 07:07:40], and see if the volume works.
Arthur Keiser:	Well-
India Tips:	Yes. I'm here. I can hear you all, and I'm so sorry about this.
Arthur Keiser:	Okay. We have the two reviewers, Jennifer and Ronnie, if you have questions?
Ronnie Booth:	Yes, we do.
Arthur Keiser:	Ronnie?
Ronnie Booth:	I've got a couple, then Jennifer's got a couple. One of the things I noticed was early on in the analysis in the 60213 acceptance to the agency by others, [inaudible 07:08:12] flyers submission of letters of support and recognition from others, but I know that there were no files uploaded and the department did not address that. Can you address that in terms of acceptance by others? Again, there was a requirement there that there would be documentation submitted, but none was submitted, and it wasn't noted by the department, unless there's something [inaudible 07:08:34] going on that I didn't [inaudible 07:08:37].
Arthur Keiser:	Herman? Elizabeth?
Speaker 23:	If I can jump in? This is still one of the agencies that was under the focus review, and so that particular regulation with the 213 was not one of the ones that was required for response, and instead the agency was only required to provide an attestation stating that they were still in compliance with that section. So, that was one that there was not an in-depth review, so the requirements under that section [inaudible 07:09:08] applicable in this review.
Ronnie Booth:	Okay. It would have been helpful to know that someplace for me, instead of spending my time looking. My question is you accredit three programs you mentioned, medical assisting, med lab tech, and surgical technology. So, do those programs, if you accredit them, also need accreditation from their respective national groups? Or do you do that in place of them?
India Tips:	Is that a question for me?
Speaker 22:	It is. Did you hear the question?

India Tips: I heard some of the question. I believe Amy could answer that question while I'm still trying to get logged back in. It's about medical [inaudible 07:09:52], and I could only hear that last part. My apologies.

Amy Rowe: Sure. So, on the programmatic side, medical assisting, medical laboratory technology, and surgical technology have options of different accreditors. If you are an institutional accredited full with [inaudible 07:10:14], and you happen to have medical assisting surgical technology or medical laboratory technology, you don't have to seek accreditation by another programmatic agency, but you absolutely can.

Ronnie Booth: So, some of the programs you have such as dental assisting, et cetera, that you outlined, they have accreditation by their national groups? They've chosen to go that route, so it's a matter of their choice?

Amy Rowe: Yeah. So we have some institutions that we accredit that have dental assisting programs, and those programs, or those institutions at the programs, do have the opportunity to seek programmatic accreditation by another agency. We do have a lot of institutions who also hold programmatic accrediting accreditation.

Ronnie Booth: So, those programs that you do accredit, those three we talked about that you accredit, is that sufficient for the states in which their students are licensed to receive licensure?

Amy Rowe: It depends on the state and the practice. Some, I believe Washington is the only state that requires certification for medical assistants. Surgical technology varies by state, and medical laboratory technology as well with different levels of education.

Ronnie Booth: So does that mean a student could complete potentially a [inaudible 07:11:47] lab tech program or a surgical type program in the state and then not be able to get licensed in that state?

Amy Rowe: I'm not sure I know the answer to that question without doing some research by state for each of the states, what the requirements are for those professions.

Ronnie Booth: Julie, do you know the answer to that? Or Tommy?

Thomas Kenny: Yeah. If I may jump in, Julie, sorry, before you, one thing I do know that we have placing emphasis on is on the student disclosure process, and ensuring that schools are properly disclosing whether or not they meet the licensure and certification requirements associated with their state agency that regulates any of the programs that they're offering within their state. So, if schools have made a determination that they have not been per our standards, they would have to be informing the students of that in writing. I can't speak to all the individual state regulations myself, but I do know that that is a point of emphasis for us.

Ronnie Booth:	Okay. I hope that those disclosures and all that is taken care of. That would be very problematic, redundant. It'd be problematic for me if we're offering programs in states, students believing that they would be able to be certified or licensed in those states, and then they would not be eligible. That would be a significant disclosure issue, and I'd think probably a legal issue at some point in time if somebody was unhappy with that.

Jennifer is going to ask a couple of questions about licensure and pass rates and things, and then I've got a follow up to that. So Jennifer, you want to do that? |
| Jennifer Blum: | Sure, and Ronnie, I actually think it's a federal regulation now that schools disclose, so I think Mr. Kenney answered the question about the accreditation fees to make sure that the schools are confined with those federal regs. But there's now a licensure disclosure requirement that requires schools on any licensure program to disclose whether their students are going to have issues with licensure.

Anyway, I wanted to, and if you listened to the last conversation, you might imagine that I have questions about student achievement standards. I actually, part of this is that, and I'm saving some of this for the policy conversations at the end of the week with the department, because some of this might not be as much about how your process is, and partly about how the department presents this in the analyst report to us. My question is, I don't understand your... So I understand that you have three different rates that are job placement, retention, and pass rates, licensure pass rates, I assume that's as applicable for licensure pass rates. It's not a licensure program.

Is it all three? So, I have two questions. Institutions have to pass all three? Institutions don't have to pass all three? I understand that you said two year's improvement, so I'm saying what is the end game here? Do they have to pass all three? Is it some combination? Also because you're both institutional and programmatic, are these pass rates at what level? Institutional programs? So, if your institution is institutionally accredited by you, what is their requirement? Is it institution or by program with regard to the junior achievement rates? Then I'll go from there. |
| India Tips: | I can answer that. Can you all hear me? |
| Jennifer Blum: | Yes. |
| India Tips: | Great. Okay. So, we evaluate all programs at the program level. So whether you're institutional with [inaudible 07:15:54] or programmatic, we hold every program that you offer to those 70% benchmarks for retention, placement, and credentialing.

Can you all still hear me? |

Jennifer Blum:	Yes.
India Tips:	Okay, great. I'm sorry, I'm really having technical issues. But as long as you can hear me, that's the key.

So, when an institution for every program has to meet those three metrics, when they fall below that metric, that raises the question as to whether they are meeting accreditation requirements or procedural requirements. At that point, whether the institution has two programs, and one is on for retention, the other for placement, they're all held to that 70% for all three criteria as it's applicable, because mandatory credentialing requirements may not apply to every program field.

When a program falls out of compliance with 70%, the commission is notified, and that program is put on reporting, even though it might be an institutional applicant with [inaudible 07:17:09]. One of the things that we do and assess institutions is that we look at whether the program or the program outcomes are systemic, and that might be a reason why if we're seeing multiple programs across multiple campuses, the commission will elevate that program-specific warning to a show cause, which is a probationary equivalent action just as a program specific warning might be, which is there's a public disclosure requirement when schools or programs are placed on either one of those actions, and we also require a teach-out plan.

Jennifer Blum:	Okay. So then I have a follow-up question to that. So, that's helpful. Thank you. But then I definitely also have a follow-up. So then my other question is this 70% figure. So, it sounds high and it sounds great, but I'm a big believer that there needs to be a basis on which the 70% for each of those was selected. It seems, I mean, to be quite frank, interestingly coincidental or something that all three are at 70%, when each metric for each outcome, I guess I should say, is quite different from one another. Job placement from retention to licensure pass rate. I mean, obviously I like that they're on the high end, but it doesn't strike me as analytical in terms of what that methodology was to get to 70%. When I tried to dig into the record, and again, it might be in there and I just missed it, but the only thing I could find that explain how you reach 70% or why, I guess it's why it's 70% for each of those, I'm just going to read from, I think it's an exhibit, the department's exhibit nine.

I'm just going to take part of it. It says, " [inaudible 07:19:08] deems 70% signifier respectable quality indicator and justification for continued program enrollment. [inaudible 07:19:17] policies regarding student achievement continue to be supported by aggregate retention and placement rate data.

So, I guess my follow-up question is, do you look at each of your programs at each of your institutions under some cohort period of time, and figure out what's the mean, median, is there a deviation rate from them? Is it actually data-driven analytics that they all landed at 70%? The reason I'm asking is that I'm a big supporter, so I don't want anybody to think I'm not a big supporter of

having an outcomes data point, but it does have to be based on something. So I just really want to dig into, and I guess I might be learning from David Eubanks, I just want to understand how you arrived at 70% for each of those rates.

India Tips: Yeah, that is a great question. I will tell you that [inaudible 07:20:28], the commission has considered its 70% and whether it needs to change for those different metrics, and time and time again, they do look at the aggregated data for programs or across programs, and it continues to lead to 70% being a starting point for determining whether a program has justifiable enrollment. They've looked at trending data. We realize that credentialing rates for some professions might be a lot lower, some might be higher. But for [inaudible 07:21:19] in determining compliance with student outcomes, and when we look at that 70% benchmark as a value or valid benchmark, we continue to confirm its validity and reliability as a place that when a school is below the 70% mark in any one of those metrics, it does raise the question. We do feel that more information is needed, more analysis is needed for programs below that benchmark.

Ronnie Booth: Jennifer, you're muted.

Speaker 25:   Jennifer, you're muted.

Jennifer Blum: Sorry about that. So that's somewhat helpful, and I want to be careful because I know pretty well the guard rails of the, in my view, somewhat unfortunate guardrails regarding student achievement standards requirements under the act and regulations. But I'm a big advocate of having outcomes metrics. I'm glad that you have outcomes metrics, but if they're not based on a real strong analytical relationship to what it looks like in the national sphere to demonstrate that 70% is the right number, I'm raising a concern.

                     And that, I think I need to tie it because I know what I said in the last session, I need to think about how that ties very specifically to the 602 16 provisions. But I'm raising a concern if you can hear [inaudible 07:23:12].

                     And along those lines, there's one more question related to this. So with regard to licensure rates, for example, you look at the national, not just how your programs do across each other, if you will, but do you look at national pass rates across... And I know by the way, getting data on pass rates is hard, but at a state level and a national level, do you look to understand what the norm is or the median or something also to think about that 70%? for the licensure pass rates? Can she hear me, India?

Candace Evans: I think she may have disconnected again.

Jennifer Blum: Yeah, it's too bad. I don't know if Amy can speak to this at all or Dr. Kenny?

Thomas Kenny:	Amy, if you don't have anything, I at least have 2 cents to chime in. I probably won't be as eloquent as India on this point, but the question I think is valid. So I cannot speak to the exact details of the comparisons between them, but from a commission meeting perspective, we do receive reports from various program advisory committees that focus on the areas that we programmatically accredit. Specifically, surgical tech, MA, medical assisting and medical lab tech.
	And when those reports come back in, we often will hear if there is feedback that we've received regarding what the national pass rates are on, for example, the CST exam. And I remember there was a lengthy conversation about how 70% was unreasonably high due to an issue with the exam two years ago where the national average was somewhere in the fifties. And so I do know that that comparison occurs and that that evaluation occurs.
	Now, does that influence what the established benchmark is for requesting additional information? In the four years that I've been there, we have not changed that benchmark and that has remained there, but I do know that in those program-specific areas that they do consider that information and that those discussions have happened. Not just in committee level, but also on a commission level and what impact that might have.
	I don't think that fully answers your question, but I hope that it at least, tangentially addresses some of the stuff you've been talking about.
Jennifer Blum:	It helps a little bit, although I wanted to add one more thing, just a finer point, having the same, because it's a licensure rate for more than one field of study, so have the exact same metric across different fields of study. I mean, again, possible, but gives me some pause because each profession might have a different trend towards what the norm is. So I only like outcomes metrics if they're proven if you will, and studied, and analytical. So I'll leave it at that for now and then pass back to Ronnie.
Ronnie Booth:	Okay. Thanks, Jennifer. And just a follow up in that sense, I'm right with her. We had these programs and a number of others at my college, and it didn't matter if I had a 90% pass rate in nursing if the state average was 95 and the federal was 94, we had a problem and we were going to take a look at, so I just encourage you again, to look at comparative data and see how you do compare to others in that regard.
	But one thing I'd like to leave you with on that is if you start a program with a hundred students and you have 70% retention, you've got 70, and if you have 70% pass, you got 49. If you have 70% get a job, you got 35. And if you look at the cumulative effect of that, just with the numbers, my question is, would a hundred students starting and having 35 placed in the job, licensed, make me happy? I think we would probably say, no. So I would just encourage you to, all of us, honestly, I think we have to take a look at that. Not least look at those numbers in isolation. [crosstalk 07:27:32].

Jennifer Blum:	Ronnie, I just noticed, I'm sorry to interrupt. I just noticed in the chat that I think India is able to respond. I do want to make sure we give [crosstalk 07:27:40].
Ronnie Booth:	Okay, yep. [crosstalk 07:27:48]. And then one follow-up question after that, India, but if you're there, you can weigh in.
India Tips:	I'm here, if you can hear me.
Ronnie Booth:	Yep, we can hear you.
India Tips:	Okay, wonderful. So I think I heard your last comment about 100 students, and if you're saying that we apply a 70% retention, that we're down to 30 students that have been withdrawn or dropped from the program. I don't think I heard the rest of it in terms of how you [crosstalk 07:28:22].
Ronnie Booth:	That's just if you apply the math and that doesn't happen that way in the real world, and we know that, but with whatever our pass rates are, success rates are, they have a cumulative effect over time. So I think we just ought to look at that for our own purposes to think about what does that mean? And does that mean it's satisfactory to us? And most of would probably go, "Well, there's work to be done."
Jennifer Blum:	And India, Jennifer, again. Were you able to hear my... I don't want to necessarily go through all of it again. I'm sensitive to time.
India Tips:	I heard you.
Jennifer Blum:	Did you hear? Okay.
India Tips:	I did, Jennifer, thank you so much. I did hear you, and I understand your concern for sure. And I'm sorry if I missed something just because of this computer issue, but the commission does take a look into that deeper dive that 70%, gives them an opportunity to look at cohort, to look at the size of the program, to look at the credentialing requirement, the nursing credentialing requirements that I think I just heard that example given.
	So they do have some discretion, but that 70% is the trigger. It's the starting point. And I get your point, it's well taken about having valuable backup information. I will tell you that that rate has been compared to other accreditors and the department, and again, has proven to be a reliable resource for us in evaluating a program's success.
Ronnie Booth:	I just have one last question and that would be, you talked earlier, India, about those bright lines, if you will, if the institutions did not meet the criteria, the 70% or got close to that, then you started doing some homework to try to figure out what's the problem. Do you do that in other areas? Suppose somebody or an institution has a significant loan default rate, or [inaudible 07:30:37] cash

monitoring, or heightened cash monitoring. Are there any triggers there that cause you to take a closer look or see if you can help those institutions resolve those issues?

India Tips: Absolutely. We have similar indicators for a financial capacity. We have a financial review committee, which is comprised of only commissioners that review every audit for every school that ABHES accredits, that financial review takes into consideration the latest composite score. It looks at three-year cohort default rates.

I will say the FRC [inaudible 07:31:18] many considers published default rates that are greater than 5%, below the federal threshold. When those triggers are hit, the deeper dive occurs. So the commission has a number of things at its discretion to use in terms of calling the question, putting the school on recording, to do a deeper dive, to allow the institution to provide action plans.

And what they believe the issues are, and when do they believe they were going to achieve compliance? I know that Dr. Kenny has spent some time on the financial review committee and might have a little bit more to add here.

Thomas Kenny: Thank you, India. I'll keep it brief because I think you did a great job summarizing it, but I will say absolutely, we do look at all the metrics that India mentioned. We do an evaluation of every school's current ratio, their net income, or any operating surpluses for the previous several years, we look at their positive net worth. And then we also evaluate things like default rates, composite scores, and a series of actions might be taken to request additional information, improvement plans or putting them on reporting and taking a more aggressive stance towards that. So it's a very active process that occurs twice a year.

Ronnie Booth: Good, thanks. Art, I don't have any more questions.

Arthur Keiser: Okay, thank you primary readers. Anybody else? Kathleen do you have a question?

Kathleen Alioto: Yes, I noticed that you have all kinds of schools, you have for profit. What I'm curious about is what kind of qualifications does the students have to have to get into your programs to begin with? I think that nurses are angels, what kind of qualifications in today's world do they need to have in order to get into the program to begin with? And if they don't have one, what kind of remediation are you doing?

India Tips: So our institutions, we have a standard that requires institutions to have admission requirements, where they are enrolling students who can be reasonably understood that those students can be successful. Now, one of the things that we tie to that standard, that's very critical, is our program effectiveness plan standards.

When schools are looking at those benchmarks, they are charged to analyze their data, whether [inaudible 07:34:04] below 70% or above 70%, to identify student characteristics and demographics to determine which mutants, for example, if assessing retention are being retained and which students are dropping, and what are the characteristics of those students?

Sometimes it's based on demographic information that might be collected on [IPEDs?], but we're really challenging our institutions to draw their student characteristics to program effectiveness. So when looking at retention, looking at who are the students that are dropping, are they day students, are they evening students? When are they dropping? Is it an issue with curriculum, core sequencing, maybe faculty?

So this analysis does tie back to perhaps it's admissions issue. The admissions criteria is not high enough, perhaps they're not getting the level of student that would reasonably complete the program. And then what can they do to better assist and service those students? So we do have the admissions criteria, but we really ensure that the institutions follow their published admission criteria and we're expect that they do when analysis that would be incorporated in their program effectiveness plan.

Kathleen Alioto: Thank you.

Arthur Keiser: Bob.

Bob Shireman: Yeah, thank you and thank you for your presentations. And I sympathize with the computer problems, mine completely froze, but thankfully I was able to get back. It looks like ABHES institutions are relatively small. On the data dashboard document, you have only one institution that gets over $200 million in loan volume.

That one school is a Florida-based school called Ultimate Medical Academy. From that data, it looks like it has a very high rate of borrowing with 91% of students taking federal loans. And it is in the lowest quartile in terms of earnings that the graduates have to repay those student loans.

How does data such as low earnings, very high rates of borrowing, how do those get taken into consideration in your agencies monitoring and oversight of schools?

India Tips: So I will say that our standards don't specifically address graduate earnings. We know that graduate earnings and gainful employment will be a topic that will be discussed for the upcoming negotiated rulemaking. And we're certainly going to be watching and be prepared to make any needed changes. But I will say that ABHES does require a 70% retention. I mean, I'm sorry, placement. And we define placement at ABHES as those employed in a position where in the

majority of the graduates job functions are related to the skills and knowledge acquired through successful completion of the training program.

So the onus is always on the institution to demonstrate that the graduate obtained that job based upon their training, their program training.

Bob Shireman: Thank you for your answer. I do think it's useful to consider that if accreditors did a better job of monitoring things like earnings, then there presumably would not need to be a gainful employment rule. So I appreciate your endorsement of the idea of reinstituting the gainful employment rule, but it's also something that accreditors can, and I think should, be paying close attention to.

One other question, before being accredited by ABHES in 2016, Ultimate Medical Academy was previously accredited by ACICS. In its final year with ACICS, Ultimate converted to non-profit status. The purchase price was very high, $325 million with 99% of that based on intangible assets. So all of those loans that 91% of the graduates are taking out are in part going to pay the school's debt, non-profit school's debt to former owners.

How did you review this school or how would you have reviewed a school like this when it came over from ACICS? Especially with regard to the conversion transaction and the debt to former owners.

India Tips: So before I turn it over to Amy to give maybe a little bit more color, you are correct. The Ultimate Medical Academy did transition from for-profit to non-profit in 2015. We've only had one other conversion and it just happened this year. But specific to Ultimate Medical Academy, I can tell you that they do not owe any debt to their prior owners. And so I just want to make sure that Amy might have a little bit more color on this institution specifically.

Bob Shireman: Amy, we can't hear you. She's there, but it's muted. It was a great answer, but it was muted.

Amy Rowe: It was more of an answer that I was trying to unmute, but my computer got stuck. So, computer problems here in North Carolina as well. So, like India said, the school does not have any debt owed to the prior owners and ABHES has recently adjusted the ownership and control process.

I think that India could probably speak to the changes that will be going into effect related to the non-profit conversion and the change of control slash ownership, that's with ABHES.

India Tips: Yes. I did want to add that piece. ABHES has not had very many, one this year, but I will tell you, our new criteria does speak to this. And it says the commission will not approve a change of control transaction which would allow the board to be controlled by an individual entity or group that would have a financial interest in the non-profit organization.

Bob Shireman:	Thank you. I appreciate that [inaudible 07:41:53] that you've been thinking about, and I'll just mention that, well, it is true that the debt is no longer owed to the former owners. It was owed to the former owners before the obligation was transferred into State of Wisconsin revenue bonds, as I understand it. So the debt is still owed, the students debt is still paying it. It's just that it is no longer to the former owners. It is to whoever bought those junk bonds. Thank you.
Arthur Keiser:	Jennifer.
Jennifer Blum:	Hi, you calling on me, Art? Sorry. Art's on mute. Okay, I'm going to take that as a yes.
Arthur Keiser:	Yes, I'm sorry Jennifer, but try... We are running up against time.
Jennifer Blum:	I know.
Arthur Keiser:	So please make it short.
Jennifer Blum:	I know we are. We may have to talk about that from a scheduling perspective. I have two quick questions, and maybe you could just say up or down or something. On the placement rate, and you say the institutions demonstrate that rate. Are they required to third-party validate? Or somehow is it demonstrated when the rate is met, like on the calculation? [crosstalk 07:43:25].
India Tips:	So ABHES chose a different... Sorry.
Jennifer Blum:	Go ahead, sorry.
India Tips:	So ABHES chose a different path when it comes to third-party verifiers. The commission, when it considered this, was not willing to move forward with validating a third party. We believed in our own verification process where we collect backup and support documentation for a sampling of our schools. I believe in the amount of 20 to 25%, and that's in combination with... That's in addition to, I'm sorry, any school that's visited by a site visit during the year where every team validates the information.

So, institutions must provide a backup documentation form. They must identify the name of the graduate, when they obtained employment, the date of employment, when it was verified, the data of verification, the person who verified it along with their contact information. And our teams are still, our annual review committees are still validating, doing our own validation by calling those individuals confirming either through the employer, if we can get it, or through the graduate, the placement information. |

Jennifer Blum:	Okay. My second question is, and apologies, these occurred to me as you were speaking on other questions. And again, parroting actually in this case, Kathleen a little bit. How many institutions in the last few years have you in some form or fashion have an enforcement action on just general sort of numbers. And of those, can you speak at all to whether the basis was the outcomes metrics that we just covered?
India Tips:	Okay. I want to make sure I understand. You're asking for the number of schools perhaps that we have withdrawn or taken a negative action?
Jennifer Blum:	Any form of adverse action.
India Tips:	Adverse action. Okay, Amy, if I can-
Jennifer Blum:	When I say schools, I mean, in your case it would be programs or schools because you're both.
India Tips:	That's right, it could be one or the other. Yup, an institutional member or programmatic. I know Amy has her hands on our data and I'm wondering if she has that number in front of her.
Amy Rowe:	Sure. So, thank you for the question too. We've had 19 adverse action since the last petition. Of those, three were related to non-compliance for procedural requirements. Eight were related to student achievement indicators. One was related to financial capability. Another was related to noncompliance for a procedural requirement and financial capability. And then six were related to substantial non-compliance with accreditation standards, which may or may not have included financial capability.
Jennifer Blum:	Sorry, thank you.
Arthur Keiser:	David, you had a question or you dropped your hand?
David Eubanks:	Yeah, I think given how much time we have.
Arthur Keiser:	Yeah, because we're losing two or three members. So, are there any other questions? Well, thank you members of the commission. Can we bring [inaudible 07:47:14] back. Elizabeth?
Elizabeth Daggett:	Yes, I have no further comments.
Arthur Keiser:	I would then move back to the committee and see if we can get it [crosstalk 07:47:27]. Yes.
Ronnie Booth:	I move that the [inaudible 07:47:30] recommend the accrediting bureau of health education schools recognition be renewed for five years.

Arthur Keiser:	There's a motion, and a second? Anybody second? [crosstalk 07:47:42]. Oh, [inaudible 07:47:44] made it second. Okay, by the way, Ronnie, I was going to call on you to do that. So you jumped me. Okay. Kathleen, is there any discussion on the motion? I'm sorry.
Jennifer Blum:	I mean, I'd like to say one thing. Just put a finer point on [inaudible 07:48:08]. I asked some pretty [inaudible 07:48:11] questions for consistency purposes and I'm not going to necessarily go negative on one agency because we weren't negative on another. But I do want to raise the point of... I would say that there are questions... I have questions around the student achievement standards as being... It's a question mark as to whether we have the purview under our authority, under 602 16, but I'm not sure whether we're demonstrating success... Whether it's an appropriate meeting of that standard if there's no basis, no proven demonstrated basis on the 70%. I have concerns about that. So I am going to raise concerns.
Arthur Keiser:	So Jennifer, I'm going to ask you the question. How about those agencies that do not have any bright lines? I mean, they have a bright line, they hold to it, they publish it. Institutions are required to follow it, but we earlier, I recognized an agency that had no bright lines and no specific definition of what is an appropriate outcome or appropriate outcome assessment. So how do you justify taking the position on one and not the other?
Jennifer Blum:	I am with you. I think we have a consistency problem as a committee. That's exactly my point, Art.
Arthur Keiser:	Are there any other discussion? Sensing none. We'll go to the vote. Kathleen?
Kathleen Alioto:	Yes.
Arthur Keiser:	Okay, Roslyn?
Roslyn Clark Artis:	Yes. [crosstalk 07:50:06].
Arthur Keiser:	Jennifer?
Jennifer Blum:	No.
Arthur Keiser:	Ronnie?
Ronnie Booth:	Yes.
Arthur Keiser:	[inaudible 07:50:14]?
Speaker 27:	Yes.
Arthur Keiser:	[inaudible 07:50:15]?

Speaker 26:	Yes.
Arthur Keiser:	David? Molly? Paul?
Paul LeBlanc:	Yes.
Arthur Keiser:	Robert?
Robert Mayes:	Yes.
Arthur Keiser:	Are you there, Robert?
Robert Mayes:	Yes.
Arthur Keiser:	Mary Ellen? Claude?
Claude Pressnell:	Yes.
Arthur Keiser:	Bob?
Bob Shireman:	Abstained.
Jennifer Blum:	Interesting.
Arthur Keiser:	Steve? Okay. The motion passes and ABHES should be renewed for five years. Well, folks, it was a difficult day. Thank you so much. Are there any other good for the good of the order? George? Do you have any announcements?
George Alan Smith:	No, let's just sign in early like we did. Around 8:40, if you can. So we can work out any glitches. But a great day today. Thank you very much.
Arthur Keiser:	Thank you for all your hard work.