

U.S. DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

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NATIONAL ADVISORY COMMITTEE ON
INSTITUTIONAL QUALITY AND INTEGRITY

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WEDNESDAY
FEBRUARY 23, 2022

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The Advisory Committee met via
Videoconference, at 10:00 a.m. EST, Arthur E.
Keiser, Chair, presiding.

ADVISORY COMMITTEE MEMBERS PRESENT

ARTHUR E. KEISER, Chair
CLAUDE PRESSNELL, Vice Chair
KATHLEEN SULLIVAN ALIOTO
JENNIFER L. BLUM, ESQ.
RONNIE L. BOOTH
WALLACE E. BOSTON
ROSLYN CLARK ARTIS
JILL DERBY
DAVID EUBANKS
MOLLY HALL MARTIN
D. MICHAEL LINDSAY
ROBERT MAYES
MARY ELLEN PETRISKO
MICHAEL POLIAKOFF
ROBERT SHIREMAN
STEVEN VAN AUDDLE

DEPARTMENT OF EDUCATION STAFF PRESENT
GEORGE ALAN SMITH, NACIQI Executive Director,
Designated Federal Official
HERMAN BOUNDS, Director, Accreditation Group
LACO CORDER
ELIZABETH DAGGETT
PAUL FLOREK
NICOLE S. HARRIS
CHARITY HELTON
REHA MALLORY SHACKELFORD
STEPHANIE McKISSIC
KARMON SIMMS-COATES
MICHAEL STEIN

AMERICAN PODIATRIC MEDICAL ASSOCIATION, COUNCIL
ON PODIATRIC MEDICAL EDUCATION (APME-CPME)
KEITH COOK, DPM, Chair
ERIC STAMPS, DPM, Chair, Accreditation
Committee
HEATHER M. STAGLIANO, DHSc, Director

NORTH DAKOTA BOARD OF NURSING (NDBN)
TAMMY BUCHHOLZ, Associate Director for Education

THE COUNCIL ON CHIROPRACTIC EDUCATION (CCE)
NIC POIRIER, D.C., Ed.D., Council Chair

COMMISSION ON ENGLISH LANGUAGE PROGRAM
ACCREDITATION (CEA)
IAN COLLINS, Commission Chair
HEIDI E. VELLENGA, Executive Director

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

2 10:02 a.m.

3 G.A. SMITH: Good morning, and
4 welcome, everyone. This is a meeting of the
5 National Advisory Committee on Institutional
6 Quality and Integrity, also known as NACIQI. My
7 name is George Alan Smith and I'm the Executive
8 Director and Designated Federal Official of
9 NACIQI.

10 NACIQI was established by Section 114
11 of the Higher Education Act of 1965 as amended,
12 or HEA, and is also governed by provisions of the
13 Federal Advisory Committee Act as amended, or
14 FACA, which sets forth standards for the
15 formation and use of advisory committees.

16 Section 101(c) and 47C-4 of the HEA
17 and Section 8016 of the Public Health Service
18 Act, 42 U.S.C. Section 2966, require the
19 Secretary to publish a list of state approval
20 agencies, nationally recognized accrediting
21 agencies, and state approval and accrediting
22 agencies for programs of nurse education that the

1 Secretary determines to be reliable authorities
2 as to the quality of education provided by the
3 institutions and programs they accredit.

4 Eligibility of the educational
5 institutions and programs who are participating
6 in various federal programs requires
7 accreditation by an agency listed by the
8 Secretary.

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

16 Further, in addition to these charges,
17 NACIQI authorizes academic graduate degrees from
18 federal agencies and institutions. This
19 authorization was provided by letter from the
20 Office of Management and Budget in 1954 and the
21 letter is available on the NACIQI website, along
22 with all other records related to NACIQI's

1 deliberations.

2 Again, thank you for joining us today
3 and I'll take this opportunity to turn it over to
4 our chairperson, Arthur Keiser.

5 Art?

6 CHAIR KEISER: Thank you, George.
7 Good morning, everyone. Welcome to our winter
8 meeting of the National Advisory Committee on
9 Institutional Quality and Integrity. It is a
10 pleasure to be here with you all. I wish I was
11 with you in person. We do miss that. I think we
12 have missed some as we are on the Zoom. But
13 thank you, staff, for -- this is a much better
14 platform and we look forward to having our
15 meeting today with it.

16 If I may, I'd like to ask our members
17 to introduce themselves. Start with Kathleen.

18 You have to take yourself off mute.
19 You went back on, Kathleen.

20 K. ALIOTO: Kathleen Sullivan Alioto,
21 advocate for early childhood education.

22 CHAIR KEISER: Roslyn?

1 R. CLARK ARTIS: Roslyn Clark Artis,
2 president of Benedict College in Columbia, South
3 Carolina.

4 CHAIR KEISER: Jennifer in Argentina?

5 J. BLUM: Jennifer Blum. I apologize
6 in advance for being a little bit in and out
7 during the meeting. I'm a higher education
8 attorney and policy advisor at Blum Higher
9 Education as an advisor.

10 CHAIR KEISER: Ronnie?

11 R. BOOTH: Ronnie Booth, president
12 emeritus, Tri-County Technical College in South
13 Carolina.

14 CHAIR KEISER: Wally?

15 W. BOSTON: Wally Boston, president
16 emeritus, American Public University System.

17 CHAIR KEISER: Jill?

18 J. DERBY: Jill Derby, senior fellow
19 of the Association of Governing Boards of
20 Universities and Colleges.

21 CHAIR KEISER: David?

22 D. EUBANKS: Good morning, everyone.

1 I'm David Eubanks at Furman University where I
2 direct institutional research.

3 CHAIR KEISER: Molly?

4 M. HALL MARTIN: Good morning,
5 everybody. Molly Hall Martin, Ph.D. candidate at
6 the University of Iowa.

7 CHAIR KEISER: Michael?

8 M. POLIAKOFF: Michael Poliakoff,
9 president, American Council of Trustees and
10 Alumni.

11 CHAIR KEISER: Let me try Michael
12 Lindsay, too.

13 M. LINDSAY: I'm Michael Lindsay, the
14 president of Taylor University in Indiana.

15 CHAIR KEISER: Robert?

16 R. MAYES: Good morning. I'm Robert
17 Mayes with the Columbia Southern Education Group
18 down in Orange Beach, Alabama.

19 CHAIR KEISER: Mary Ellen?

20 M. E. PETRISKO: Mary Ellen Petrisko,
21 past president of the WASC Senior College and
22 University Commission.

1 CHAIR KEISER: I don't see Claude. Is
2 he here?

3 M. E. PETRISKO: No. He said he
4 wouldn't be here.

5 CHAIR KEISER: Okay. Bob?

6 R. SHIREMAN: Bob Shireman, director
7 of the Higher Education Program at the Century
8 Foundation.

9 CHAIR KEISER: And last but not least from
10 Washington, Steven?

11 S. VAN AUDDLE: Thank you, Art. Steve
12 Van Audle, president emeritus, Walla Walla
13 Community College out in Washington State.

14 CHAIR KEISER: Thank you, everybody,
15 for being here and for the next two days. Again,
16 my great pleasure now is to introduce the U.S.
17 Department of Education's Under Secretary, James
18 Kvaal.

19 James Kvaal formerly served as
20 president of the Institute for College Access and
21 Success, a research and advocacy nonprofit
22 dedicated to affordability and equity in higher

1 education.

2 TICAS is nationally recognized for its
3 research and policy recommendations on student
4 debt. Mr. Kvaal served -- Mr. Kvaal served in
5 the Obama administration as the deputy domestic
6 policy advisor at the White House and deputy
7 Under Secretary of the U.S. Department of
8 Education.

9 He had led efforts to cut student loan
10 monthly payments, hold career colleges
11 accountable for excessive debt, and make
12 community colleges tuition free.

13 He helped organize the White House
14 Summit on College Opportunity, which featured
15 more than a hundred college presidents and other
16 leaders committing to actions to help more
17 students graduate from college.

18 He served in his senior role in the
19 U.S. House of Representatives and Senate. Mr.
20 Kvaal taught at the University of Michigan's Ford
21 School of Public Policy and graduated with honors
22 from Stanford University and Harvard Law School.

1 Please welcome with me James Kraal.

2 J. KVAAL: Thank you, Art, and thanks,
3 everybody, for being with us this morning and
4 your service on the committee. A special thank
5 you to those of you on the West Coast who've
6 gotten up extra early.

7 It's really an honor for me to help
8 kick off the first meeting of 2022 of the
9 National Advisory Committee on Institutional
10 Quality and Integrity, and to those of us in the
11 Biden/Harris administration, accreditors are
12 essential partners in both quality assurance and
13 in quality improvement, and we need both
14 assurance and improvement to build the higher
15 education system we need.

16 So all of you play a really important
17 role by advising the Secretary on the role of
18 accreditation and the recognition of accrediting
19 agencies. You have a lot of leverage over these
20 quality issues and your work is really more
21 important than ever because of the moment we're
22 in.

1 Our country needs now more than ever
2 a concerted effort to promote upward mobility and
3 raise living standards, to provide opportunity
4 across geographic, racial, and economic lines,
5 and to help people understand new perspectives
6 across the divides in our country, and it's hard
7 to see how we can reach those goals without more
8 education and higher education, in particular.

9 But our colleges and universities are
10 struggling. Enrollment has fallen by nearly a
11 million students, and this missing million could
12 leave a permanent dent in our country's
13 educational attainment.

14 President Biden's American Rescue Plan
15 has been one of the biggest investments ever in
16 college scholarships and historically underfunded
17 colleges and universities, and it is helping
18 students make ends meet and stay enrolled and
19 it's helping colleges slow the spread of the
20 pandemic and keep faculty and staff employed.

21 But we still have a long way to go.
22 Students that I talk to tell me about new

1 financial needs, learning gaps, mental health
2 challenges. Many colleges are struggling with
3 constantly changing public health demands, new
4 ways of teaching and learning, and in many cases
5 real financial challenges.

6 We can't go back to 2019 so we need to
7 build something better. We need to think
8 differently and act in ways that both lift up our
9 students, prepare them for an ever changing
10 economy, and obtain living wage jobs and economic
11 independence.

12 We also need to face up to the problem
13 of student debt. Loans can help many people
14 enroll in college and earn a degree but we have
15 to be honest about the fact that far too often
16 loans have left students and families worse off
17 than if they had never gone to college at all.

18 Many students do not graduate or earn
19 a degree of little value, and the crisis among
20 black borrowers in particular is shocking.

21 Finally, we need to serve all students
22 well. Too many students, especially low income

1 students, students of color, and rural students
2 attend underfunded colleges where they're less
3 likely to graduate and enter a career.

4 Our national graduation rate is only
5 62 percent. That's up 8 percentage points over
6 the past decade but it is still far too low.
7 Only about half of Latino students graduate and
8 even lower shares of black and Native American
9 students, and I'm concerned these rates may fall
10 further due to the pandemic.

11 Despite these figures, our national
12 conversation often revolves around the colleges
13 and universities that are highly selective, non-
14 inclusive, wealthy, not affordable, and that are
15 recognized for their strong reputations rather
16 than their contributions to upward mobility.

17 And all of this brings me to the topic
18 at hand. Accrediting agency and the members of
19 NACIQI must be a part of the solution to these
20 problems and I have a couple of suggestions.

21 First, we have to face the facts on
22 how well students are doing. It's as simple as

1 that. Colleges need to be using data,
2 accreditors need to be using data, and NACIQI
3 needs to be using data. Some of the most
4 inspiring examples of inclusive college are built
5 around data and evidence.

6 Georgia State, for example,
7 experienced a moral awakening and a raft of data-
8 driven experimentation. In the words of the New
9 York Times, that helped them raise graduation
10 rates by 23 percentage points and close gaps by
11 race.

12 Yesterday, the department released a
13 revised accreditor handbook which details the
14 information ED will use to review agencies, and
15 we want to know how agencies are identifying
16 problems with student success, what data they're
17 using to do so, and how they'll continue to
18 monitor institutions that are falling short.

19 NACIQI should also use data in the
20 accrediting agency recognition process to
21 students making an investment of their time and
22 money, many while juggling jobs and childcare.

1 The outcomes that matter are whether a degree
2 will prepare them for a middle class career, a
3 good salary and full participation in their
4 community.

5 These outcomes should be at the center
6 of any discussion about quality. That's why at
7 the last meeting we reintroduced the accreditor
8 dashboards and the accompanying data files.

9 The dashboards raised some of the
10 issues that are of core importance to the
11 administration, including student outcomes,
12 equity, and value, and outcomes should be an
13 important starting point for quality assurance.

14 If a college's job placement rates
15 dip, for example, accreditors could be asking
16 whether that signals a change in quality at the
17 college or external economic factors, and either
18 way how the college plans to respond.

19 By pairing NACIQI members' expertise
20 in accreditation with data on how an agency's
21 institutions perform across a range of student
22 success measures, you will be able to better

1 evaluate how each agency is living up to its
2 commitment to ensure quality at its approved
3 colleges.

4 I know there's a discussion scheduled
5 during this meeting about how to best use those
6 dashboards, and I look forward to hearing more
7 about your thoughts.

8 Taking student outcomes seriously also
9 requires us to uphold rigor across the system.
10 As permitted by the new regulations, most
11 regional agencies have opened up their boundaries
12 to institutions outside of their traditional
13 geographic scope.

14 Competition among accreditors can be
15 a good thing. But we can't allow colleges to
16 shop for lower standards or accreditors to
17 compete by watering down their rigor.

18 The department's Accreditation Group
19 will be closely monitoring agencies that are
20 expanding their scope. We will prioritize
21 academic quality and integrity and ensure that
22 strong standards and approval processes are in

1 place. We will be paying close attention and I
2 hope NACIQI will do the same.

3 One last note. We're committed to
4 greater transparency. Transparency is
5 fundamental to maintaining rigor and ensuring
6 that accrediting agencies are holding
7 institutions and programs to high standards.

8 That's why this month we released the
9 final staff analysis of each of the accrediting
10 agencies up for review at this meeting.

11 We believe that making this
12 information public will help ensure the public
13 has confidence in the accreditation system and in
14 the department's ongoing oversight and review of
15 agencies, and allow more robust conversation
16 among NACIQI members and the public.

17 Before I go, I want to say thank you
18 to the department staff who made this meeting
19 possible, including George Smith, Monica Freeman,
20 Herman Bounds and his team in the Accreditation
21 Group -- Donna Mangold, Soren Lagarde and Angela
22 Sierra.

1 I also want to say thank you to all
2 the NACIQI committee members. I know you serve
3 as volunteers and I'm grateful for your hard
4 work.

5 The Secretary and I take seriously
6 your role as advisors. NACIQI's authority is
7 broad and we want to hear from you on the
8 recognition process for accrediting agencies and
9 broader issues as well.

10 So please speak out on your concerns
11 and share your recommendations, even if the
12 immediate response or authority is not
13 immediately clear.

14 Thank you, and best wishes for a
15 successful meeting today.

16 CHAIR KEISER: Thank you, Mr.
17 Secretary.

18 We do appreciate your comments and I'm
19 sure they'll be well received by the committee.

20 I'm not sure we're set up for
21 questions so we'll move to the next issue on our
22 agenda, which is to discuss the accreditation

1 dashboard and have a discussion on how we're
2 going to use it.

3 George, you're going to make some
4 comments, please.

5 G.A. SMITH: Yeah, very quickly.

6 I just wanted to remind folks that I
7 guess back in December when we had our targeted
8 NACIQI training you all requested an opportunity
9 to discuss the dashboard and how you might use it
10 in your review of the agency petitions or
11 agencies in general.

12 So I wanted -- we figured it'd be best
13 just to put that at the top of the meeting before
14 you actually started discussing any of the -- any
15 of the agencies.

16 I did invite Brian Fu from the
17 department to be on hand and he is with us today
18 to answer any clarifying or technical questions
19 you might have about the data.

20 But this isn't -- you know, he won't
21 be giving a presentation or anything like that.
22 It's just an opportunity for you all to discuss

1 how you might use a dashboard.

2 For example, you know, would you like
3 to continue the pilot project that occurred, you
4 know, a few years ago. That's something for you
5 to discuss.

6 So it's really up to you. I'll turn
7 it back over to you, Art, to facilitate. But
8 it's, you know, your time to discuss how you
9 might consider using the dashboard, going
10 forward.

11 CHAIR KEISER: George, would you
12 remind me how do people raise their hands? Is it
13 just visual?

14 G.A. SMITH: I'll let the -- yeah,
15 I'll let the -- well, someone just did it.
16 Kathleen did it. Looks great, Kathleen.

17 CHAIR KEISER: Trying to see who that
18 is.

19 G.A. SMITH: Patrick, can you explain
20 that?

21 PARTICIPANT: It's in the reactions.
22 It's at the bottom of the reactions thing.

1 CHAIR KEISER: Okay. So if you have
2 a reaction, you have a comment you want to make,
3 you would raise your hand that way.

4 We thank you, Kathleen, for figuring
5 that out. I'm really proud of you. That is
6 really good.

7 Kathleen, go ahead. You have the
8 floor for the first part of the discussion.

9 K. ALIOTO: All right. I have a one
10 comment, which is that I find the layout a little
11 bit confusing -- the colors in the layout A
12 little difficult to really focus in on what
13 materials it is that I'm searching for. That's
14 one.

15 Number two, you list the HCM2 in terms
16 of heightened cash monitoring but not HCM1, which
17 I think would be of interest -- would be of
18 interest to me before they get to number two, and
19 also of interest to other people who are looking
20 at this data, and I'm very appreciative to the
21 Under Secretary for focusing on the importance of
22 data.

1 And then the other thing that is not
2 included is the median debt of non-completers.
3 The document indicates the median debt of
4 completers but how about the 40 percent of people
5 who don't complete and are shackled with debt?

6 So I would like to see that included
7 in the information in the document. Thank you.

8 CHAIR KEISER: Thank you, Kathleen.
9 Bob, you are next.

10 R. SHIREMAN: Thanks. Well, Kathleen
11 is way ahead of me because I didn't take another
12 look at the dashboard. I didn't realize until
13 yesterday that we were going to be talking about
14 it.

15 My recollection, though, from before
16 is that it's limited to data from the
17 institutions accredited by agencies and that --
18 which means there's limited data with regard to
19 programmatic accrediting agencies and now with
20 more program specific data available it seems
21 like we could do more there. But I might be
22 wrong. So maybe Brian can let me know whether

1 that's the case on programmatic versus
2 institutional agencies.

3 CHAIR KEISER: I have Jennifer, then
4 David. And if you'd bring your hand down. I
5 don't know how to do that. But --

6 J. BLUM: Yeah, I noticed that I
7 applauded and raised my hand so go figure. So I
8 don't know. Can we ask questions of Brian? I
9 mean, you said that he was here. I don't see him
10 on my screen, but I assume -- oh, yes, I do.

11 So I'm really supportive of the
12 dashboard. I guess my questions -- I have a
13 couple of different questions. I guess my issues
14 are with regard to the quality of the data with
15 respect to the department, of course.

16 Am I correct, for example, that the
17 data is only Title IV students or does it include
18 all students at an institution for -- and this is
19 just one example.

20 B. FU: It depends on the data
21 element. So, for example, the earnings that is
22 based on Title IV students, graduation is based

1 on a larger sample of students reported --

2 J. BLUM: So, I mean -- thanks, Brian.

3 So, my point is that, as we go forward and sort
4 of consider how to use the data, which I'm very
5 supportive of using, I just feel like it's really
6 important that we -- you know, we have to be, I
7 think, pretty subjective about how we approach,
8 literally, each accrediting agency's data so we -
9 - that we better understand, you know, that we're
10 not going to be doing -- like, in my view, it's
11 hard to do apples to apples to accreditors.

12 It's hard to do apples to apples to
13 institutions. I wish we had a better -- and I
14 know there's legislation pending, which is great.
15 But I just want to sort of call that out as a
16 point of, you know, caution with regard to the
17 data.

18 And I think it was Kathleen who just
19 asked about HCM1 versus HCM2. I think that's
20 another example where HCM1 gets used for very
21 short-term bases sometimes on the part of an
22 institution and then, you know, sometimes it's a

1 longer issue or a bigger problem.

2 And so HCM1, I mean, I think until the
3 department, frankly, better has a -- and they can
4 talk about this maybe tomorrow in the policy
5 conversation but, you know, I think we need a
6 whole full rulemaking on, you know, what HCM
7 means because I think over time there's -- it's a
8 morass a bit in terms of what it actually means
9 at the one level, Kathleen.

10 So I would be reticent to jump to a
11 conclusion over HCM1 unless, you know, multitudes
12 of institutions by an accreditor were on it. But
13 if it's just that they have a smaller percentage
14 of institutions on it, then I -- you know, I'm
15 not sure that's a problem necessarily.

16 So it's that subjectivity that I think
17 is going to be really important for us as we move
18 forward until the data is more robust.

19 CHAIR KEISER: Thank you, Jennifer.

20 David?

21 D. EUBANKS: Yes. Thanks to the
22 leadership and department staff who make this

1 data possible because it's very rich and it's
2 super helpful.

3 It's helpful in one way - the raw data
4 that lists every institution -- because you can
5 filter to an accreditor that we're reviewing and
6 then -- and then sort by different student
7 achievements to see.

8 You know, if an accreditor is
9 upholding a standard that the public should
10 trust, there should be some sort of floor to
11 student achievement, one would think, and it's
12 very easy to find that and I think it's easy to
13 have a conversation with the agency to figure out
14 what's going on.

15 What's a little harder -- and this is
16 a sort of a question to bring to the group --
17 when we have all that information in aggregate we
18 can ask more nuanced questions like, for example,
19 graduation rates normally would correlate with
20 student achievement.

21 So if we see an agency that's got high
22 graduation rates and low student achievement,

1 that suggests that the graduation rates might be
2 being manipulated artificially or something. It
3 raises an interesting question anyway.

4 But that kind of question isn't the
5 sort of thing that we can bring up in the time
6 frame we have for these meetings. It would
7 require the agency to have time to analyze it,
8 see if I made a mistake or somebody else made a
9 mistake, and come back with a kind of nuanced
10 response so that -- the data is great but it also
11 presents some questions about raising complicated
12 questions we can't necessarily answer within the
13 limitations of the current NACIQI setup.

14 CHAIR KEISER: Wally?

15 W. BOSTON: Thanks, Art. I agree with
16 Kathleen's recommendation that we should include
17 debt from non-completers. I think that's pretty
18 important, particularly not just at the undergrad
19 level but also at the graduate level,
20 particularly in some of the professional
21 programs.

22 And I also agree with Jennifer's

1 comment about looking at data from all college
2 students. I think this is a consumer issue, and
3 low cost institutions like community colleges may
4 have students who are able to pay for their
5 education without participating in Title IV and I
6 think we do ourselves and the institutions a
7 disservice when we don't include all the data.

8 So regardless of the fact that maybe
9 with graduation rates we're looking at all
10 students. If we're not looking at all students
11 for earnings or for debt, I think that's a
12 mistake. And those are my comments.

13 CHAIR KEISER: I have a comment that
14 -- well, Steve, go ahead. You're muted, Steve.
15 You're muted, Steve.

16 S. VAN AUDDLE: I sound better that
17 way, Art, I think.

18 CHAIR KEISER: Well, you look good.
19 You look good.

20 S. VAN AUDDLE: Good. I read through
21 these and, Bob, I did find that we do have some
22 of these forms for accrediting associations.

1 The American Podiatric Medical
2 Association is in here so -- but not all. I
3 mean, there was only two that I could find any
4 institutions or agencies that we're reviewing
5 today.

6 My thought is you start with
7 integrity, and we need to focus on from the data
8 we have now through this analysis and synthesis
9 to see what the real critical elements, from our
10 viewpoint, that we're going to hold institutions
11 to a high standard on to ensure they have
12 integrity because without that it's going to be
13 hard to have quality.

14 And I'd also like to put it back on
15 the accreditors and ask them kind of an open
16 question, what are you doing with your collection
17 of institutions that you accredit to help give us
18 confidence that you are ensuring integrity of
19 these institutions?

20 And then we have the question, well,
21 what if there's not integrity there? We heard
22 this morning that some students may be better off

1 not going on to college and spending all that
2 money. That's a serious question for this
3 committee, I think.

4 Are we going to tolerate that, or how
5 can we do something about it? Can we ask the
6 accrediting organizations what can you do with
7 the institutions you accredit to ensure that this
8 does not happen?

9 And maybe as an initial step if we
10 could identify, like, the top three or four
11 majors of integrity that we would have that would
12 give us confidence, then I start to think we're
13 headed in the right direction.

14 And then with quality it's the same
15 thing. If you've got a hundred measures of
16 quality and you don't sort out what's most
17 important -- what you're going to focus on --
18 it's going to be very difficult to make a
19 difference.

20 So I think kind of focusing on the
21 policies that give us confidence that this is a
22 quality institution is really important. That's

1 going to take a work session to do that.

2 But we're getting the data. I agree
3 with David. We're getting the data now where we
4 can address this part of the agenda.

5 I think we have had some real concerns
6 about some of the accreditors and their lack of
7 integrity and lack of quality, and we need to
8 focus on that and assure ourselves and assure
9 them that they're either okay or they're out of
10 compliance.

11 CHAIR KEISER: Okay. If I may make a
12 comment, and then Jennifer.

13 One of my concerns is when we're
14 dealing with a large accreditor, especially one
15 like a regional accreditor that has such a
16 variety of institutions, there's a huge
17 difference in the outcomes on an open enrollment
18 institution than there is on a select -- an
19 institution that's highly selective, and that's
20 going to be hard for us, one, to weed out where
21 if the agency is doing its job when you have two
22 really diverse groups of institutions involved in

1 that particular agency.

2 And will we be looking at the fact --
3 I mean, those were around when Simon, who was a
4 student, and he brought up the community college
5 in Chicago.

6 So the Higher Learning Commission
7 accredits some of the best schools in the country
8 and does a great job. But also, you have inner
9 city community colleges which have very
10 challenging outcomes.

11 How can we as an association take that
12 disparate data and weave, at least, certain
13 decisions from that?

14 Jennifer? You're muted.

15 J. BLUM: Okay. So that was a nice
16 segue for what I was going to say as well, Art.

17 I feel like -- and also something that
18 David said about -- I feel like when we as a
19 committee use the dashboard the goal is not to
20 sort of blind side an agency with all of a sudden
21 sort of using the -- you know, using the
22 dashboard and so -- and yet, you know, I think we

1 want to use the dashboard.

2 So I have a -- and I want this to be
3 a productive conversation so I was thinking about
4 recommendations, and I guess from a department
5 standpoint, I'm curious as to whether there's a
6 way during the staff review process for the staff
7 to somehow impart not necessarily that we would
8 take their view but at least we would understand,
9 like, the extent to which, if at all, the staff
10 has relied on the dashboard at all to reach any
11 of its conclusions and recognizing that the
12 accreditation staff are not expert on the
13 dashboard.

14 You know, I'm wondering whether as a
15 recommendation if they're -- if it's possible for
16 somebody in Brian's shop, you know -- sort of,
17 you know, the side of the house at the department
18 to be sort of liaison to the accreditation arm of
19 the house so that we can somehow be at least
20 provided directionally where the department's
21 thinking is about how they use the dashboard and
22 what was important in their analysis across the

1 dashboard.

2 And then I just want to finish on
3 something that Art said, and I have a high
4 appreciation for how the Under Secretary and the
5 Secretary have been speaking lately about elite
6 selectivity of institutions and, you know, I
7 don't view the selective institutions as being
8 the solution to our problems necessarily in this
9 country, although they're, obviously, a very
10 important part.

11 And so I -- you know, I worry sort of
12 along lines of what Art was saying of -- you
13 know, I worry about that in terms of how that
14 influences on the accreditation side.

15 So I do think, you know, not leaving
16 it to our devices and the committee but getting,
17 you know, additional guidance from -- you know,
18 maybe it's a concerted effort at the department,
19 you know, of collaboration between certain
20 offices at the department to help guide us a bit
21 would be helpful.

22 CHAIR KEISER: Jill, and then Michael.

1 J. DERBY: Well, I want to follow up
2 on -- I think Jennifer's suggestion is very good
3 and how can our staff assist us in using this
4 dashboard most effectively.

5 But also following up on Steve's
6 comments and yours, Art, you know, whether a work
7 session would be in order or a committee
8 appointed to sort of sort through this and help
9 us use this dashboard most effectively.

10 You know, to Steve's question -- what
11 are the data points that indicate integrity --
12 there are -- this is a very rich source of data
13 and I'm worried that we might not use it very
14 effectively or to its full effectiveness just
15 because we meet twice a year and we don't have
16 these kind of work sessions where we can have
17 good discussions and follow-up actions can be
18 taken.

19 So I want to suggest some sort of
20 follow-up here whether a work session, a
21 committee, that could come forth with
22 recommendations but also thoughts about how the

1 staff can support us using this dashboard most
2 effectively, given, as Jennifer said, it isn't
3 something that they are in the practice of
4 bringing to their analysis.

5 CHAIR KEISER: Thank you, Jill.
6 Michael?

7 M. POLIAKOFF: Yeah. Let me start
8 with an apology of being brand new. Maybe I
9 shouldn't be jumping in but --

10 CHAIR KEISER: No. No, you got to
11 jump in.

12 M. POLIAKOFF: Okay. I'd like to see
13 that we put a bookmark in for nationally normed
14 assessments, making those things really front and
15 center and visible.

16 Assessment is crucial, and very often
17 we don't have the kinds of benchmarks we need.
18 For me, one of the greatest wake-up calls was the
19 National Assessment of Adult Literacy and to see
20 how many college graduates, including four-year
21 college graduates, don't rise to proficiency in
22 the basic measures of the kind of things we

1 expect from college graduates.

2 And I worry about what that means at
3 the institutional level and at the accreditor
4 level, and I realize there's a long and nasty
5 history about prescribing particular assessments.

6 But somehow or another, we have got to
7 really crack into that. Many of the career
8 schools seem to me the clearest ones because
9 they've got licensure exams and you can see are
10 people actually being qualified for their
11 vocational training -- their career.

12 And there's no reason, given the value
13 added assessments that are out there, that we
14 don't see more adoption. So if we're going to
15 have a working group, I wonder if we could just
16 have a little bookmark that we take a very hard
17 look at the underutilized potential of nationally
18 normed assessments.

19 CHAIR KEISER: Thank you, Michael.

20 Ronnie, you haven't spoken yet. Then
21 Herman and then Kathleen.

22 R. BOOTH: Let me, first, say I agree

1 with Michael. I think the national assessments
2 would be a good thing.

3 You know, coming from a two-year
4 college with a lot of technical programs it was
5 pretty easy to tell if we were doing our work or
6 not doing our work.

7 But to go back to the bigger question
8 in the use and training for the use of the
9 dashboard, seems to me our responsibility would
10 be to hold accrediting agencies responsible for
11 using the dashboard as they evaluate individual
12 colleges.

13 I don't know that it's our job to
14 evaluate individual colleges. Our job is to make
15 sure that the accrediting agencies are using all
16 the data they have access to in doing the
17 evaluation.

18 But having said that, then that data
19 needs to be seen in context. It's about inputs,
20 quite honestly. The Ivy Leagues have different
21 outcomes than I did at the two-year college level
22 or that many of the rest of us did, Steve in

1 particular, because we had different inputs.

2 So I think we need to take a hard look
3 at the dashboard. I think we need to think hard
4 about how we encourage, if we can use that in a
5 very strong sense, our accrediting agencies to
6 use the data they have to evaluate the
7 institutions that they know so well.

8 So I think training is in order. I
9 think it ought to happen seriously at every
10 accreditation meeting throughout the country, and
11 I think we have got a good start.

12 But much like -- the data is not --
13 it's not perfect and we know that but much like a
14 good detective, we take the data we have and then
15 we see where it takes us and then we uncover
16 other things along the way.

17 So we're never going to have a perfect
18 data set. That's not going to happen. But we do
19 have to take what we have and then, in a sense,
20 sort of follow that string to where it goes.

21 So for the department, I really think
22 some training, a serious focus, saying to our

1 accrediting agencies, this is -- this is data
2 that's available and you need to be using it and
3 we're going to hold you accountable for using it.

4 CHAIR KEISER: Thank you, Ronnie.
5 Herman?

6 By the way, I will have you introduce
7 your staff. I did move a little fast. So you
8 and George can introduce the staff. But go
9 ahead, and you have a comment on this?

10 You're muted.

11 H. BOUNDS: Thanks, Art. Yes, I do.
12 I just want to remind the committee that, you
13 know, currently we use about six different data
14 sources when we conduct our analysis.

15 We use a tool. It's called the
16 Enterprise Data Warehouse and it has some
17 information that's similar to the NACIQI
18 dashboards. But it allows us to look at
19 individual accrediting agencies just a little
20 further than the information that's contained in
21 the dashboards.

22 You know, we also use the -- excuse

1 me, the HCM2 lists. We get an updated one of
2 those lists from FSA. That's part of our review.

3 We also use our DAPIP -- the Database
4 of Accredited Institutions and Programs -- the
5 information contained in DAPIP to look at the
6 current accreditation status of some schools and
7 where they are in an agency's review process and,
8 again, our Westlaw legal alerts and our library
9 alerts. So we're looking at a lot of information
10 currently when we conduct a review.

11 And the other thing I just wanted to
12 remind, all of that information is in
13 relationship to what the accrediting agency
14 standards are.

15 You know, if an agency does say they
16 don't have a standard for a graduation rate, we
17 may see an indication there and even though they
18 don't have a standard, though, we can -- we can
19 then ask the accrediting agency, explain how your
20 standards are sufficiently rigorous.

21 And I use that term quite a bit since
22 that is regulatory language. We want the

1 accrediting agency to be able to tell us how your
2 standards are sufficiently rigorous if there are
3 dips and dives in other areas.

4 So I just wanted to remind the
5 committee that we use about five or six different
6 data tools doing our review process.

7 CHAIR KEISER: Thank you. And Ronnie
8 and Michael, would you put your hand down unless
9 you want to speak again?

10 Kathleen, your hand is up and I assume
11 that you want to speak again?

12 K. ALIOTO: Yes, I do. Yes, I do want
13 to speak again, and I'm so delighted to start
14 this meeting, first, with the Under Secretary's
15 speech and then to totally agree with Jennifer as
16 well as feeling whipped from hearing Steve and
17 Art and Jill and Michael in terms of the future
18 for our committee.

19 And I'd like -- I had kind of thought
20 that these things would come up in the policy
21 discussion tomorrow, but since we're talking
22 about it in terms of the facts that our fee, the

1 department is restricted by the regulations. But
2 we also can ask the department to help us out.

3 And so I'd like to ask the department
4 in terms of the presentations that are being made
5 to us that, one, when you give the overview of an
6 agency that you indicate the number of students.

7 It's all over the place when I was
8 trying to find out the nursing program. I
9 finally found it in the appendix -- one of the
10 appendices some of the just basic facts -- how
11 many schools, how many students are affected. If
12 we had that right in the start of every
13 presentation I think it would simplify things --
14 simplify things for us.

15 The second thing is the files. I find
16 it very difficult to pick them up -- pull up the
17 files. And also, if the files could be labeled.

18 Some of the agencies are doing that
19 and it's -- the chiropractic agency did that and
20 it's so much more efficient to know that you're
21 going to look at an audit instead of just having
22 the different numbers there.

1 And let's see. I'd like to have the
2 audits labeled. So if all of the -- if all of
3 the files could be labeled it would be very
4 helpful.

5 And also, I find it very odd that the
6 majority of the accrediting agencies that have
7 been brought before us in the last two years do
8 not have third party comments.

9 I mean, all of us have been involved
10 with the politics of education in some way and
11 there are always people who have agreed for a
12 bug. How is it possible that nobody has third
13 party comments anymore?

14 So those are some of the things and
15 maybe we can discuss them in the policy meeting
16 tomorrow. But I would like to have the
17 department be able to help us get things done
18 more efficiently.

19 Thank you.

20 CHAIR KEISER: Thank you, Kathleen,
21 and now I want to -- I don't know, Brian, you had
22 your hand up but looks like you've brought it

1 down.

2 Herman will maybe wrap it up. And by
3 the way, Kathleen, the fact that the Council on
4 Chiropractic Education had no third party
5 comments is extraordinary.

6 For those who have been here a while,
7 that used to be -- it was more of a, I don't
8 know, like a protest than it was a hearing.

9 So it was interesting. So I'm not
10 sure I --

11 K. ALIOTO: Nobody has them.

12 CHAIR KEISER: I was really surprised
13 to see that, too. Herman, you're up, and then
14 we'll tie it up and then you could -- once you've
15 made your comments you can introduce your staff.

16 H. BOUNDS: All right. Thanks. Yeah,
17 I was just going to -- I was going to make -- I
18 think all committee members should be aware that
19 we announce agencies under review and solicit
20 third party comments early in the process. The
21 comment period is normally 30 days.

22 So, you know, all I would say is, you

1 know, if folks read and see that Federal Register
2 notice it definitely offers them the opportunity
3 to make comments. And, you know, of course, we
4 don't have any control. We don't go out and
5 personally contact folks to try and get them to
6 comment in.

7 But the comment period is always well
8 announced. So that's -- you know, that's all
9 I'll say on that point.

10 Sure, I will go ahead and introduce
11 the Accreditating Group staff. Of course, my --

12 CHAIR KEISER: Actually, Brian --
13 looks like Brian raised his hand again, and then
14 you could do that, if you would.

15 H. BOUNDS: All right.

16 CHAIR KEISER: Okay. Brian?

17 B. FU: Yes. So I just wanted to kind
18 of address some of the earlier comments about the
19 dashboard and make sure everything or most things
20 are addressed.

21 I think the -- one of the design
22 principles that we took in designing the

1 dashboards is kind of like the 10,000-foot view.
2 So it's -- I think we see it very much as the
3 conversation starter in some of the underlying
4 data files to be -- sort of the more granular
5 observations could be done in those contexts.

6 When I hear that, you know, it'd be
7 helpful to have more and more things here, right
8 now one of the things that we tried to do is keep
9 everything kind of in one page and that's why,
10 like, the colors are a little bit potentially
11 confusing, as one commenter said.

12 This thing is already 56 pages. Is
13 there an appetite to kind of expand this
14 dashboard? It'll be harder to kind of read at
15 first. You'll have more context.

16 So it's always -- it's this tradeoff
17 between being at 10,000 feet in the air or 5,000
18 feet in the air. So I just -- if we could get a
19 temperature check and maybe we can do this
20 offline through a survey or something.

21 But it'd be helpful from our
22 perspective and putting these together to know if

1 -- like, if we -- if we give ourselves two pages,
2 for example, and we can include things like HCM1,
3 some programmatic data, would that be more
4 helpful? But then you'd have to -- it would
5 actually be 112 pages when you first look at it
6 rather than 56 pages. So let us know what you
7 think of that.

8 CHAIR KEISER: Brian, what we might --
9 we might do is I'll talk with George and see if
10 we can put together a committee and if you are
11 interested in serving on that committee to review
12 that and make the recommendations.

13 I would be glad to appoint that. I
14 think just, you know, let George know you want to
15 serve on that or let me know and we can get that
16 and try to set up a time to have that discussion.

17 Bob, you had your hand up.

18 R. SHIREMAN: It's sort of responding
19 to Brian, but I might as well go ahead. I mean,
20 I like the idea of more data. I think having
21 more available it's then available for us to use
22 and other people to use.

1 Also, it would be useful to release on
2 it -- to release, again, the specific agencies
3 that are coming up at particular moments. So,
4 for example -- because I think that would help
5 encourage -- help people to think about third
6 party comments they might have about agencies.

7 So the one year before a meeting when
8 they announce that certain agencies are going --
9 there's the first request for a public comment,
10 that's an opportunity to put some information out
11 there for people to respond to and then, again,
12 that 30 days before is another opportunity.

13 So I think there are ways to chunk the
14 pieces of the dashboard so that they're used and
15 get more feedback as well.

16 CHAIR KEISER: Okay. Jennifer, did
17 you have a final comment? You're muted. You're
18 muted.

19 J. BLUM: Sorry. First of all, so,
20 Art, I do like the idea of the committee. I
21 don't know if we need to take a vote on, like, a
22 pilot, like, whether that's something that -- but

1 I think that's a good idea.

2 To Bob, so going back to something
3 that Herman said about the criteria or the data
4 of various -- different forms of data that they -
5 - that the staff uses, I think it -- I mean,
6 which is great, but I think it brings up a good
7 point of, okay, you used these things but then
8 there's the dashboard and so -- and then there
9 are the recognition criteria.

10 The lawyer in me says we better make
11 sure that all the dots are connected, that when
12 we rely on the dashboard to make -- you know,
13 have a viewpoint, it needs to connect to the
14 recognition criteria.

15 So that does take me back, again, to
16 understanding if the staff for each agency -- as
17 they come up, understanding the extent to which
18 the staff utilized, relied on, looked at the
19 dashboard and connecting it to the recognition
20 criteria, and to Bob's point, making that sort of
21 known, I think, are important aspects.

22 And then the one other thing I will

1 say is -- and this might be too bold to suggest -
2 - but I do care about what the accrediting
3 agencies and institutions care about how the
4 dashboard is being utilized as well.

5 And so, you know, I hate to say it,
6 but what also comes to mind is to -- Brian, to
7 your questions about the format and what it looks
8 like, it almost feels like a technical review
9 panel to me, which is, I know, outside of the
10 committee.

11 But to get all viewpoints and to
12 understand how -- what the format is going to
13 look like and how it's going to, you know, be
14 used, those are all things that -- you know, and
15 that has an analog scorecard. You use TRPs for
16 that.

17 So I'm just throwing that out there.
18 I'm not necessarily advocating for it, but I just
19 wanted to throw that concept out there.

20 CHAIR KEISER: Okay, thank you,
21 Jennifer. And I appreciate the robust
22 discussion. I'm sure the staff has taken some

1 notes and -- but if you would like I will appoint
2 a subcommittee because I think it's important and
3 just let George and myself know and we'll figure
4 out the process to get that done. Doesn't need a
5 vote. I think I hear the consensus.

6 G.A. SMITH: Okay. Art, this is
7 George.

8 Okay, you hear the consensus for the
9 subcommittee.

10 CHAIR KEISER: I hear the consensus.

11 G.A. SMITH: I just wanted to make
12 sure about the -- you hear the consensus. Okay.
13 That's fine. Or should we just take a vote to
14 make it for the record or you feel consensus is
15 enough?

16 CHAIR KEISER: Anybody objects to --

17 G.A. SMITH: I know in the past we
18 have voted for the subcommittees. I just wanted
19 to be clear.

20 CHAIR KEISER: Okay. Well, I don't
21 see any objections. Okay. George, would you
22 like to start the introductions of your team and

1 then, Herman, would you like to do yours?

2 H. BOUNDS: Sure. Yeah. So you
3 already know Monica Freeman and I'm joined today
4 by OGC Angela Sierra and Soren Lagarde.

5 CHAIR KEISER: Okay. Herman?

6 H. BOUNDS: Yeah. Good morning again.
7 My name is Herman Bounds. Of course, I'm the
8 director of the Accreditation Group, and I could
9 start with introductions of Accreditation Group
10 staff.

11 The first staff member is Beth
12 Daggett. Beth, would you introduce yourself,
13 please?

14 E. DAGGETT: Elizabeth Daggett with
15 the Accreditation Group.

16 H. BOUNDS: Reha Mallory?

17 R. MALLORY: Hello, everyone. Reha
18 Mallory with the Accreditation Group.

19 H. BOUNDS: Nicole Harris?

20 I don't know if Nicole is on. I think

21 --

22 N. HARRIS: I'm sorry. I think I was

1 on mute. Sorry.

2 Good morning. Dr. Nicole Harris from
3 the U.S. Department of Education Accreditation
4 Group analyst and good to see everyone again
5 today.

6 H. BOUNDS: Stephanie McKissic? Is
7 Stephanie there?

8 PARTICIPANT: Unmute.

9 G.A. SMITH: Stephanie, are you on
10 mute?

11 Okay, we'll move on to --

12 S. MCKISSIC: Can you hear me now?

13 H. BOUNDS: Yeah, we can.

14 S. MCKISSIC: Oh, I'm sorry. I wasn't
15 on mute. But Dr. Stephanie McKissic, the
16 Accreditation Group. Thank you.

17 H. BOUNDS: Okay. Charity Helton?

18 Charity, are you there?

19 CHAIR KEISER: She's muted.

20 H. BOUNDS: Charity, are you muted?

21 C. HELTON: Good morning. This is
22 Charity Helton with the Accreditation Group.

1 H. BOUNDS: All right. Karmon Simms-
2 Coates?

3 K. SIMMS-COATES: Good morning. This
4 is Karmon Simms-Coates with the Accreditation
5 Group.

6 H. BOUNDS: Mike Stein?

7 M. STEIN: Good morning, everybody.
8 Mike Stein with the Accreditation Group.

9 H. BOUNDS: L.G.?

10 L.G. CORDER: Good morning. L.G.
11 Corder, Accreditation Group.

12 H. BOUNDS: And Paul Florek?

13 P. FLOREK: Good morning. Paul
14 Florek, Accreditation Group.

15 H. BOUNDS: All right. Thank you,
16 Art. That's all of us.

17 CHAIR KEISER: Well, great. Thank
18 you. Thank you, staff. You do a lot of work and
19 we really appreciate what you do.

20 We're about ready to get into the
21 beginning of our review of agencies. I'd like to
22 go over our standard review procedures and just

1 to make sure we -- so we follow a process and a
2 procedure in these reviews.

3 At first we'll have the primary
4 readers from the department introduce the agency
5 application. Then at that point, the department
6 staff provides a briefing. The agency
7 representatives then provide comments about the
8 briefing and about their agencies. Then we have
9 questions by the NACIQI followed by response and
10 comment from the agencies.

11 If there are third party comments we
12 would then hear at that time, at which point
13 there will be three minutes for each of the third
14 party commenters. The agency then responds to
15 the third party comments.

16 The Department and staff respond to
17 the agency's response and the third party
18 comments, and then we have a discussion and a
19 vote.

20 Are there any questions? I don't
21 think there are. We have done this before.

22 The first renewal of recognition is

1 the American Podiatric Medical Association
2 Council on Podiatric Medical Education.

3 I hope I get that right. The primary
4 readers are Roslyn Clark Artis and Wally Boston.
5 Our staff is Elizabeth Daggett and we have two --
6 we have one agency representative.

7 If there -- I was asked at this time
8 if there are any recusals from the APA -- the
9 American Podiatric Association. Sensing none,
10 I'll recognize Elizabeth.

11 I'm sorry. I'll recognize either
12 Roslyn or Wally. Trying to get used to this
13 again.

14 R. CLARK ARTIS: Good morning,
15 colleagues. Roslyn Artis here. I have the
16 privilege of presenting the petition for
17 continued recognition on behalf of the American
18 Podiatric Medical Association.

19 The American Podiatric Medical
20 Association has been continuously recognized
21 since 1952. It was last recognized for continued
22 recognition in the fall of 2016 during the

1 meeting of NACIQI.

2 Both Department staff and the NACIQI
3 at that time recommended to the senior Department
4 officials renewal of the agency's recommend --
5 excuse me, recognition for a period of five
6 years.

7 The Council on Podiatric Medicine of
8 the American Podiatric Medical Association
9 accredits course colleges of podiatric medicine.
10 At present, the accrediting -- the agency
11 accredits nine colleges of podiatric medicine and
12 has no provisionally accredited institutions.

13 Eight of the nine institutions are
14 also accredited by another institutional
15 accrediting agency with Title IV privileges.

16 The agency's recognition enables its
17 freestanding institutions to establish
18 eligibility to receive federal student assistance
19 funding under Title IV.

20 The agency currently serves as the
21 Title IV gatekeeper and requests at this point is
22 before NACIQI on a request for an additional five

1 years of recognition, which has been recommended
2 by the NACIQI staff for the American Podiatric
3 Medical Association, and cede to my colleague for
4 questions.

5 CHAIR KEISER: Thank you Roslyn.
6 Wally, anything you want to -- any comments?

7 W. BOSTON: I'm going to defer until
8 after we have the analyst's presentation, and
9 then I have a question for her.

10 CHAIR KEISER: Elizabeth, you're up.

11 E. DAGGETT: Good morning, Mr. Chair,
12 and members of the committee. Can you hear me?

13 CHAIR KEISER: Yes.

14 E. DAGGETT: Okay. My name is
15 Elizabeth Daggett and I'm providing a summary of
16 the review of the petition for renewal of
17 recognition for the agency, which is the American
18 Podiatric Medical Association Council on
19 Podiatric Medical Education, which I'll refer to
20 as CPME.

21 The staff recommendation to the senior
22 Department official for this agency is to renew

1 the agency's recognition for a period of five
2 years.

3 The scope of recognition for the
4 agency is the accreditation and pre-accreditation
5 throughout the United States of freestanding
6 colleges of podiatric medicine and programs of
7 pediatric medicine, including, first,
8 professional programs leading to the degree of
9 doctor of podiatric medicine.

10 This recommendation is based on our
11 review of the agency's petition and its
12 supporting documentation, as well as a virtual
13 observation of a site visit in December of 2020
14 and a CPME Council and Accreditation Committee
15 meeting on April of 2021.

16 Department staff conducted a virtual
17 file review in January of 2021. Our review of
18 the agency's petition found that the agency is in
19 compliance with the Secretary's criteria for
20 recognition.

21 The Department received no complaints
22 regarding this agency during the recognition

1 period and received no third party comments
2 during this review.

3 Therefore, as I stated earlier, the
4 staff is recommending to the senior Department
5 official to renew the agency's recognition for a
6 period of five years.

7 There are representatives of the
8 agency here to answer your questions. Thank you.

9 CHAIR KEISER: Did you have a comment,
10 Wally, or a question?

11 W. BOSTON: Yes. So, Elizabeth, I
12 noted just in your verbal report now as well as
13 the written report -- and I'll go to the written
14 report -- your narrative on Criteria 602.19B,
15 monitoring annual reports, you said that you
16 conducted a virtual file review in January 2021
17 and reviewed the annual reports for all nine
18 accredited institutions and programs for the
19 previous two years as well as the agency's
20 related action letters.

21 There was one institution, Western
22 University, that has had a continuing problem

1 with its graduation rates meeting that standard
2 and there was a detailed exhibit -- I believe it
3 was Exhibit 26 -- that had letters of
4 correspondence.

5 But those letters of correspondence
6 only went through April of 2019 and indicated
7 that at April 2020 the extension of Western
8 University's exception to meeting that graduation
9 requirement would be reviewed.

10 So I assume that was in the review.
11 Can you comment on that action that happened at
12 April '20? Because it is not in any of our
13 exhibits.

14 E. DAGGETT: I'd be happy to do so.
15 I need to pull up a different document to take a
16 look and see. I would say that the agency
17 representatives are here and they could
18 definitely speak to that as well.

19 It probably will take me a minute to
20 try to find that, but I'm happy to try and work
21 on that.

22 W. BOSTON: Well, I have a similar

1 question for them. So, you know, I'm glad to ask
2 them when it's their -- you know, my time to ask
3 them questions I'm willing to do that as well.
4 So I can defer. Thank you.

5 CHAIR KEISER: Are you finished,
6 Elizabeth?

7 E. DAGGETT: Yes. I mean, I'm just
8 looking up -- I'm trying to look up the answer
9 for Wally and I'm happy to provide that once I
10 find it. I just -- it's not as though I have all
11 of these right next to me. So hold on one
12 second.

13 CHAIR KEISER: If not, let me have the
14 agency representatives come up and then you can
15 bring that back. We have three agency
16 representatives -- Keith Cook, Eric Stamps, and -
17 -

18 E. DAGGETT: Sorry. Just really
19 quickly -- Art, really quickly, I did see that
20 they -- I did review the information and they
21 were deemed in compliance in October of 2020.

22 They were given an extension of good

1 cause at the April 2020, which was their two-year
2 max period, but given an extension and then
3 deemed in compliance, which I saw documentation
4 of during the file review.

5 CHAIR KEISER: Thank you, Elizabeth.
6 And then the last would be Heather Stagliano. If
7 you would please -- are they on here yet?

8 H. STAGLIANO: Yes, we're here.

9 CHAIR KEISER: Okay. Great. Well,
10 whoever is speaking first you're welcome to
11 introduce your team and provide us your report.

12 K. COOK: Thank you. Good morning,
13 everyone.

14 Mr. Chair, members of the committee,
15 we would like to thank you for this opportunity
16 to speak on behalf of the Council on Podiatric
17 Medical Education, otherwise known as CPME.

18 My name is Dr. Keith Cook and I am the
19 current chair of the CPME and serve as the
20 director of the Podiatry Department in podiatric
21 medical education at University Hospital in
22 Newark, New Jersey.

1 I would like to take this opportunity
2 to introduce Dr. Eric Stamps, who serves as the
3 current chair of the Council's Accreditation
4 Committee. Dr. Stamps is the dean at the
5 California School of Podiatric Medicine at Samuel
6 Merritt University in Oakland, California.

7 In addition today is Dr. Heather
8 Stagliano, who serves as the director of the
9 Council. We would also like to express our
10 appreciation to Ms. Elizabeth Daggett for her
11 assistance in developing our petition.

12 Her knowledge of the regulations was,
13 clearly, evident and her guidance proved
14 invaluable during the process.

15 CHAIR KEISER: Thank you very much.
16 Wally, do you have a question or --

17 W. BOSTON: I do. I do, and thank
18 you, Art.

19 So my question is kind of multi-part
20 and it starts with your response to Criteria
21 602.20A, enforcement time lines, and you talk
22 about institutions out of compliance must come

1 into compliance within two years.

2 Failure to do so will result in the
3 withdrawal of accreditation. Then extensions are
4 possible under certain circumstances, such as
5 replacing the director of academic affairs or the
6 provost or whatever you call them -- the dean.

7 And then you go on to note that one
8 institution, Western University, has been out of
9 compliance with the required four-year graduation
10 rate since 2016 and '17.

11 The college was given an extension
12 until April 2019 to come in compliance and
13 another extension until April of '20. And I
14 noted when I questioned Ms. Daggett about the
15 data I only went through letters -- the Exhibit
16 26 only went through letters of 2019 and she was
17 correct to provide me with information, which
18 actually I found on your website, much more
19 current information about the status of the
20 institution.

21 But it appears to me, and this is
22 where it gets kind of complicated, that the only

1 way that this institution came into compliance
2 was you actually changed the graduation standard
3 from being one standard deviation below the
4 average of the -- all the institutions and your
5 reason stated was that it was difficult for the
6 institutions to predict where they were going to
7 be if they had to wait until all the data was
8 submitted.

9 But there's really only been one
10 institution that's been out of compliance for a
11 number of years and that's Western University.
12 And so the standard was changed to a bright line
13 70 percent graduation rate and, lo and behold, in
14 October of '20, Western Union -- Western
15 University finally comes into compliance with
16 that.

17 So my first part of the question is,
18 you know, what data did you utilize to make your
19 decision to come into -- to utilize 70 percent
20 instead of the standard that you've been using
21 for many years, which was the average of
22 everybody with an exception allowed as long as it

1 was -- did not exceed one standard deviation.

2 And then the second part of -- part of
3 this question is that it appears, based on the
4 data that you report on your website, that a year
5 after Western University came into compliance
6 with their graduation rate that they're no longer
7 in compliance with their pass rate -- the
8 licensing pass rate -- which is the first part of
9 the license is after the second year.

10 And, interestingly, based upon your
11 spreadsheet that you submitted with your
12 application on graduation rates -- APMLE pass
13 rates first time test takers -- and the residency
14 placement rates, Western had an extremely high --
15 91 percent part one pass rate during the 2015 to
16 2017 and they're now cited in October '21 with a
17 letter with a 73 percent pass rate.

18 So, you know, I don't have access to
19 all of the data that you do. But as a layman, it
20 certainly appears to me oddly coincidental that
21 as their pass rate for graduation rates did
22 improve somewhat from 68.7 to 72 or 73 percent,

1 kind of odd that that pass rate for the APMLE
2 dropped significantly from 91 to 73 percent, and
3 I'd like to, you know, hear your assessment of
4 that situation and get some more details. Thank
5 you.

6 H. STAGLIANO: Sure, and thank you for
7 that question.

8 So I'll start out with the change in
9 the graduation rate standard, and as you
10 mentioned, it was -- it was a standard where
11 schools didn't know where they stood year to
12 year.

13 So they would have their own measures
14 of success. But they didn't know if they would
15 be in or out of compliance until we reviewed the
16 annual report data.

17 And so when we went through a
18 comprehensive review of those standards in 2019,
19 we determined that we didn't think that it was a
20 fair way to assess graduation rates because it
21 was -- we bunched all of the schools together.

22 So what we did was we looked at the

1 previous seven years or so of data graduation
2 rates. We went out to the community of interest.
3 We looked at how other accreditors were measuring
4 graduation rates and then we determined that we
5 should make this change so that schools will know
6 where they are, if they're able to meet that new
7 benchmark, and if they're falling behind they
8 can, you know, put other measures in place to
9 make sure that they come into compliance.

10 And if we're speaking about Western,
11 in particular, they did have difficulty with
12 their graduation rate. But then in 2020 their
13 graduation rate bumped up to 81 percent and then
14 in 2021, 88 percent.

15 And, as you know, graduation rate is
16 a lagging indicator. So it's not something that
17 you can immediately put into place and see if it
18 -- how it works.

19 It takes a while to see if you're --
20 when they put in all of these different supports
21 for students to find out exactly what is
22 necessary to ensure that these students are

1 succeeding so where are those weaker points.

2 And so that is why the Council
3 determined that they should have an extension for
4 good cause because we were seeing an upward trend
5 in their graduation rates. So that's the first
6 part of your question.

7 The second part is about the drop in
8 the APMLE part one scores, and I can tell you
9 that with the pandemic we found that across the
10 board with all schools that it dropped about --
11 that pass rate dropped about 10 percent, so
12 universally among all schools.

13 So that is something that we're very,
14 very closely monitoring because 10 percent is a
15 huge drop among all of the schools, and schools
16 are now implementing different measures and
17 supports to see what is it that they need to do
18 to support these students based on what's
19 happening with the pandemic and to ensure that
20 these students are able to succeed.

21 But I will say also that there's a --
22 they can -- we only measure the first time pass

1 rate on the APMLE. But the students can take it
2 subsequent times, and when they take it the
3 second time then we have a much higher percentage
4 that are passing.

5 So the students were able to succeed
6 as they may just need more supports now with the
7 pandemic. But that's something that we're
8 looking at -- we're monitoring very, very
9 closely.

10 W. BOSTON: Thank you. So a follow-up
11 to the pandemic deduction. Did any other
12 institutions receive letters for the decreased
13 first time pass rate or was it just Western that
14 fell below your 75 percent standard?

15 H. STAGLIANO: We had one other school
16 that fell below that 75 percent benchmark and so
17 they were cited with an area of non-compliance as
18 well.

19 W. BOSTON: Thank you.

20 CHAIR KEISER: Roslyn?

21 R. CLARK ARTIS: Yes?

22 CHAIR KEISER: Do you have any

1 questions? If not --

2 R. CLARK ARTIS: I do not have any
3 questions.

4 CHAIR KEISER: Anybody have questions
5 from the group?

6 David, you have your hand up. Mary
7 Ellen, you have your hand up second.

8 D. EUBANKS: Yes, thank you.

9 CHAIR KEISER: Then Artis third.

10 D. EUBANKS: Should I go ahead, Art?

11 CHAIR KEISER: Yes, go ahead, David.
12 Please.

13 D. EUBANKS: Thank you.

14 The student achievement materials are
15 reviewed closely and tend to think of student
16 achievement as something that happens over time,
17 as someone just alluded to that there's at least
18 a several year lag between what you start with
19 and then maybe graduation and licensing and so
20 forth.

21 And it seems to me that the
22 presentation of that material shows a great deal

1 of attention and that it seems to work pretty
2 well, and I wanted to call out one part that I
3 thought was particularly good.

4 The APMA standard for requirement A
5 stipulates that admissions policies where student
6 achievement begins has to be developed in
7 accordance with a longitudinal analysis of
8 incoming students as correlated with student
9 success in the program, something like through
10 regression analysis, in other words.

11 And, in fact, the self-study that was
12 presented as a sample describes exactly that
13 longitudinal analysis of admissions. The
14 undergraduate GPA in science of 3.0 prior and an
15 MCAT score of 493 were predictors of achieving
16 overall success at this particular institution.

17 So I wanted to call that out as an
18 admirable use of data science but also probe a
19 little bit about how effective you actually see
20 that. Does it work?

21 I mean, particularly you might address
22 the case of Western. What's the tradeoff in the

1 admissions recruiting knob, if you will, and the
2 ultimate graduation rate?

3 Is that what they changed? Did they
4 modify that and now we're seeing better results?

5 And the second part of the question is
6 these are -- these tools can sometimes,
7 unfortunately, have the effect of homogenizing
8 the student body. So is there -- is there a
9 process that's sensitive to the individual needs
10 of students and their ability to succeed, despite
11 the numbers that may evidence.

12 H. STAGLIANO: For the admission
13 policies, each school will determine what their -
14 - what those metrics are. So what is that bottom
15 number that they want to -- students need to
16 achieve.

17 So they look at students holistically.
18 I mean, they're going to look at those -- the
19 science GPA as something that is a very huge
20 indicator for them, their overall GPA in their
21 undergraduate studies, and then their MCAT
22 scores.

1 So when they -- then they also conduct
2 interviews and, you know, have different
3 procedures. Each school is a little bit
4 different.

5 And so when we talk to those schools,
6 when we are going onsite and conducting their
7 site visits and learning, you know, more about
8 the intricacies of this, it's very interesting
9 because they will discuss that they may have
10 decided that they need to drop their MCAT score
11 by a point or so or they need to increase it by a
12 little bit, just to ensure that those students
13 are still able to succeed.

14 But the schools know what are the --
15 what is the lower baseline that those students
16 are going to require in order to succeed because
17 the school is very, very rigorous.

18 So the first few years of their
19 programming they're taking all of their basic
20 science courses. So they're -- we need to know
21 that they're going to be able to succeed and the
22 schools do as well, and then from there the last

1 two years they go into more of their clinical
2 education.

3 So the school -- it's up to the
4 schools of how they're going to measure that.
5 But they all know where -- how much they can tune
6 that and then balance it with the student
7 supports because that's going to be huge for
8 those schools to ensure that those students
9 succeed, because if they bring a student into the
10 school they want them to succeed and they want
11 them to graduate.

12 So they're going to ensure that there
13 are different supports, if that's advising, if
14 that's tutoring, whatever they need to have to
15 succeed in the program.

16 I was going to say something else
17 about -- oh, we know that for -- your question
18 about looking at those different students, so
19 each -- the schools have programs and software
20 that they can look at these certain exams and how
21 are those students performing on each section of
22 the exam, so each student individually on each

1 section.

2 And when the students are
3 underperforming in one area then they know that
4 that student is going to need a little bit more
5 support in this type of education or this subject
6 area and so that's how they know what -- exactly
7 what that individual student needs.

8 So, I mean, of course, as the
9 accreditor, we're looking at the big picture of
10 how the school is performing, how those students
11 are doing.

12 But at the school level, they are
13 looking at each individual student to ensure that
14 they're able to learn all of these -- all of
15 these materials so that they're able to fully
16 succeed in the program.

17 And I don't know if Dr. Stamps -- he's
18 the chair of our Accreditation Committee and dean
19 at one of our schools, if he wants to add
20 anything more to that.

21 E. STAMPS: Dr. Stagliano, that's
22 absolutely correct. All the schools look at --

1 do their longitudinal analysis a little
2 differently, but they have some method of looking
3 at how students are doing in each subject area
4 and adjusting accordingly because the goal, of
5 course, is to -- is student success, and making
6 sure that our students pass first time the
7 American Podiatric Medical Licensing Exam part
8 one.

9 D. EUBANKS: Thank you.

10 CHAIR KEISER: I'm sorry. Mary Ellen?

11 M. E. PETRISKO: Thank you.

12 Because of the -- because of the
13 focused review that we have had in place for
14 several years now, there are a lot of the
15 criteria on the regulations that don't have to be
16 specifically responded to.

17 But I'm curious to hear what your
18 experience has been over the last couple of
19 years, actually, with the pandemic in two areas.
20 One, is in distance education. You know, most
21 institutions have had to rely much more on
22 distance education than they had previously.

1 So I'd like to hear what you have to
2 say about your institutions dealing with that,
3 particularly with regard to clinical work.

4 And then I'd like to hear about your
5 -- how you have responded with not being able to
6 do onsite reviews, or have you done any onsite
7 reviews and anything that you've learned about
8 the process of review, through whatever changes
9 you need to make -- you've needed to make because
10 of the pandemic.

11 H. STAGLIANO: Sure. So, you know, as
12 everybody else experienced with the pandemic,
13 things were thrown into flux immediately in early
14 March -- mid-March of 2020.

15 At that point, we had put together an
16 emergency declaration for schools to provide
17 guidance based on the Secretary's declaration
18 that allowed for distance education.

19 So we had alerted all of the schools
20 to say, if you need to move your classes to
21 distance education -- remote learning -- in order
22 to protect faculty and protect students, then you

1 need to do that, and so, of course, schools shut
2 down and these schools engaged in distance
3 education.

4 We don't have that in our scope
5 currently because it's such a hands-on profession
6 and there's clinical learning -- the science, the
7 anatomy. There's so much hands-on learning that
8 takes place.

9 And what we did is we monitored those
10 schools every two months for the first year of
11 the pandemic and we would ask them, what is it
12 that you're doing, how's it going, and, you know,
13 and we want you -- we expect you to measure how
14 the students are performing. Are you -- what
15 kind of trends are you seeing with this?

16 So we did that for the first year to
17 just really keep our finger on the pulse of
18 what's happening across our nine schools. And
19 then schools -- as things opened up and
20 individuals felt safer then students returned to
21 the classrooms and what they did is they would --
22 they may have added different sections of labs to

1 have fewer students in the lab at one time so
2 they could have six feet of spacing.

3 Students would wear masks for the
4 protection that they needed. And so that's what
5 the schools did to bring the students back in to
6 the classroom.

7 They might have also reworked their
8 curriculums to say, okay, this is a hands-on
9 activity or section of the curriculum, and they
10 would move it to a different semester and move
11 things around just a little bit to make sure that
12 they could continue with their education -- that
13 they weren't going to extend the education but
14 just move it around for them in the meantime to
15 see how that works.

16 And so then what we have learned
17 through that and what the schools have learned is
18 that some of this worked really well. The
19 students enjoyed distance learning.

20 They really -- the data were showing
21 that the students were just as successful in
22 these courses as they had been when it was in-

1 person learning.

2 And we have done our agenda at the
3 spring meeting that's coming up to discuss
4 increasing our scope at the Department to allow
5 for distance education.

6 Now, it wouldn't be 100 percent
7 distance education because it wouldn't make sense
8 in podiatry because of the hands-on approach to
9 learning -- all of the clinical education that
10 takes place.

11 But for some courses where schools
12 might have determined, you know, this course can
13 be done remotely, students really loved it, they
14 succeeded in it and, you know, here are those --
15 here is this outcome to show us that it -- you
16 know, it may really work well.

17 Now, I don't know if Dr. Stamps wants
18 to add more as the dean.

19 E. STAMPS: Yeah, I could speak to
20 that.

21 During COVID, we had to make
22 adjustments for student success because not every

1 student had an ideal environment for learning and
2 for test taking.

3 So we adjusted the scale for grading,
4 for example. Some courses, as Dr. Stagliano
5 mentioned, worked very well as distance -- as
6 distance learning and others not as much.

7 I think most schools ran climate --
8 student climate surveys to see what the students
9 prefer and it's very variable. Some students in
10 the beginning, you know, didn't like distance
11 learning but now, you know, that's changed a bit.

12 M. E. PETRISKO: And the onsite
13 reviews that you have today will be due. Can you
14 tell me a little bit about how that's worked for
15 you and what you've learned through that? Any
16 potential changes in the future?

17 I mean, it is required that there be
18 onsite reviews, according to -- according -- to
19 regulations. It's been suspended for now. But
20 what have you learned and how has that gone for
21 you?

22 H. STAGLIANO: Sure. Sorry I forgot

1 that part of your question.

2 So we have -- we only have nine
3 schools. So, you know, we don't -- it's not that
4 we have this large number of onsites that we're
5 conducting.

6 So our first one came up in June of
7 2020 and that was to the New York College of
8 Podiatric Medicine. But because of the pandemic,
9 because there was everything -- you know,
10 everything was happening right then, we moved
11 that onsite to December of 2020 just to make sure
12 that, you know, safety -- no one knew what was
13 really happening, it's so early in 2020.

14 So what we did was we conducted -- or
15 we had to update policies and, you know, to allow
16 for virtual site visits because we had never
17 allowed for it before.

18 So we conducted that site visit in
19 December of 2020 and we happened to have a staff
20 member that lives in New York City and they were
21 able to go onsite, masking and temperature checks
22 and COVID tests so everything beforehand.

1 And so they were able to be present
2 onsite to assess the facilities and all that
3 while the rest of the team, which is -- would be
4 a five-member team, conducted it -- the site
5 visit through Zoom, and we will be doing a
6 follow-up visit with that school sometime in the
7 summer or fall.

8 But then in November, we -- November
9 of 2021, our next goal site visit came up and
10 that was to the Scholl College in Chicago and
11 that was an in-person visit and the whole team
12 was able to arrive onsite.

13 There were rules about vaccination and
14 masking and all of that. The school had those
15 rules and CPME has those -- has those rules. And
16 so we followed all of that and we were able to
17 conduct that onsite in person, which was really
18 great to be able to do.

19 So we have really only had those two
20 experiences. But, I mean, from what we learned,
21 I learned that the virtual site visits went
22 better than I expected.

1 You know, the first time you do it you
2 think it's -- you know, it's going to be a four-
3 day visit and it's a lot of time. You know, can
4 you get all the same information, you know, over
5 the internet.

6 But we found that it worked really
7 well and -- I mean, we won't continue with that
8 method of doing it but, you know, it was the one
9 time we got to try it out and found it to be
10 successful, and then when we went back to in
11 person with Scholl.

12 It was really nice to be around people
13 again and to see the students in person, you
14 know, versus boxes on a screen.

15 But I hope that answers your question.

16 M. E. PETRISKO: It does. Thank you
17 very much.

18 CHAIR KEISER: The next box is Bob
19 Shireman.

20 R. SHIREMAN: Thank you. I have three
21 questions.

22 The first one is related to the idea

1 of cutting your ties to us and the federal
2 government, and I ask this because I've noticed
3 that some of the most respected accreditors out
4 there are ones that do not seek to be recognized
5 by the Secretary of Education -- for example, the
6 engineering accreditor, ABET.

7 There's also a business accreditor --
8 business school accreditor -- highly recognized,
9 not federally -- highly respected, not federally
10 recognized.

11 And I think what happens is that for
12 institutional accreditors they kind of get stuck
13 in this situation where they can't actually have
14 tough standards because if they apply them their
15 schools lose access to Title IV. So it's too
16 severe of a consequence.

17 And second, for programmatic
18 accreditors, the secretarial recognition can kind
19 of be a crutch -- a prestige crutch. They're
20 prestigious because they're secretarially
21 recognized rather than having to kind of
22 demonstrate it on their own.

1 I'm asking this of you because, as you
2 mentioned, you have only nine schools. Eight of
3 those nine are programmatically accredited.

4 They don't use your accreditation as
5 their institutional accreditation, and my
6 understanding is that the one school that does
7 use your agency as its institutional accreditor -
8 - the New York College of Podiatric Medicine --
9 has become a part of a network of schools that
10 have other accreditation institutionally.

11 So, potentially, that college might
12 not need CPME recognition anymore. So I'm
13 curious whether this is an issue that you have
14 discussed and whether you would consider that I,
15 frankly, would like to see fewer of the
16 programmatic accreditors using the federal
17 recognition.

18 I'm curious whether this has come up
19 and if that's something that you would consider.

20 H. STAGLIANO: So for the New York
21 College of Podiatric Medicine, they're in the
22 process of merging with a university, and in

1 doing that we would lose our ability to service
2 their Title IV gatekeeper and require a change of
3 scope with the Department.

4 Of course, it's something that we have
5 discussed in planning for this. Now, that merger
6 hasn't been finalized.

7 So we're still -- consider they're a
8 Title IV gatekeeper today and, you know, we'll
9 follow through with all of the requirements for,
10 you know, finalizing that and, you know, handing
11 the keys over to their new institutional
12 accreditor.

13 But we do have the Title 7 link, the
14 health professions student loans and loans for
15 disadvantaged students, that link us to the
16 Department, and so we have not talked about, you
17 know, removing ourselves from the Department.

18 We plan to keep that recognition, and
19 those links. I believe for the health profession
20 student loans it's about \$1.8 million that flow
21 to the schools for that and for the loans for
22 disadvantaged students about \$75,000.

1 So and I think it's about six schools
2 that engage or that utilize those Title 7 funds
3 because of the recognition with CPME.

4 R. SHIREMAN: Thank you.

5 Second question is about -- as you
6 know, the Department's regulations require
7 agencies to have on all of their decision-making
8 bodies representatives of the public.

9 I think of that requirement as
10 requiring some outsiders -- knowledgeable
11 outsiders -- who have a commitment to the public
12 interest, have a commitment to students -- the
13 kind of people who will, in addition to your own
14 institutional representatives would look at the
15 accreditation dashboard, ask tough questions, and
16 hold the agency accountable.

17 I noticed that one of your public
18 members, if I'm not mistaken, is a -- was an
19 assistant director at APMA for 12 years and is
20 now a registered lobbyist for another trade
21 association, which does not feel to me like a
22 real outsider, as somebody who used to work for

1 your association.

2 Can you tell me anything about that?
3 Maybe I'm wrong about that being one of the
4 public members, and any other thoughts about kind
5 of what you see as the role of your public
6 members.

7 H. STAGLIANO: So for CPME we have a
8 total of 11 members on our Council. Two of them
9 are public numbers and one is a post-secondary
10 educator. So the public members we have, one of
11 them is an associate vice provost for academic
12 administration and chief assessment officer at
13 the University of Rochester.

14 And then you're correct about the --
15 the second public member is a health care lawyer
16 and he works for the American Optometric
17 Association Health Policy Institute.

18 In the past, he was an employee of
19 APMA. But CPME and APMA -- I mean, even though
20 that's our parent organization it's separate. We
21 maintain that boundary of separate and
22 independent, and so it was determined that he is

1 able to serve as a public member based on the
2 Secretary's requirements for a public member.

3 And then the post-secondary educator
4 that we have is a research professor in the
5 Department of Chemistry at Western Michigan
6 University.

7 Those three individuals bring a wealth
8 of knowledge to CPME about what's happening
9 outside of podiatry, because if we have eight
10 podiatrists that are sitting on the Council and
11 then three individuals that are -- have no
12 association whatsoever with podiatry, it allows
13 for better dialogue and better understanding of
14 directions of, you know, what should we do to
15 protect students or how might this be viewed or,
16 you know, what's the best way to address this
17 problem, and we rely heavily on their input about
18 anything outside of podiatry.

19 R. SHIREMAN: Thank you.

20 The third question is about your
21 recruiting and advertising standards. I was
22 looking for what the standard is that you apply

1 and that what I found was the requirement that
2 the institution provide a description of the
3 college's recruitment policies and procedures
4 with examples of recruitment materials, but I did
5 not see what standard is applied to those
6 materials. Can you -- is there -- is there
7 something I missed?

8 H. STAGLIANO: So for our standard six
9 that has to do students and then A is the
10 admissions policies, and within that we talk
11 about admissions and recruitment together.

12 We allow each school to determine what
13 their admissions policies are going to be and how
14 they're going to recruit students. We don't have
15 a specific standard that states that, you know,
16 to recruit students you must do X or Y.

17 We allow that to be based on how the
18 -- how the school determines that it will work
19 best for them, and that's something that we
20 looked at -- look at when we go to their onsite
21 visits to see how is it that they're recruiting
22 students.

1 Now, overall, there are 697 seats
2 among the nine schools and last year, I believe,
3 about 650 of those seats were filled.

4 So the schools are not filling all of
5 their seats and that's because they -- based on
6 what their admission criteria are, they will
7 determine is this student qualified enough? Are
8 they going to be able to withstand the rigor of
9 this program to be successful?

10 And so they leave seats open if --
11 even though there are enough applicants, they may
12 say there are not enough qualified applicants for
13 this program.

14 But we don't specifically say that
15 they have to recruit one way or another. And
16 then the -- I don't know if you'd call it a
17 sister or a cousin organization -- the American
18 Association of Colleges of Podiatric Medicine --
19 and they work much more closely with recruitment
20 efforts with the schools to determine, you know,
21 maybe ways -- different methods to engage
22 students that may be interested in podiatry.

1 And Dr. Stamps may be able to speak to
2 more of that as a dean and provide better
3 insight.

4 E. STAMPS: Yeah. Well, first, I'll
5 say that, yes, we don't necessarily fill all the
6 seats. Our students -- you know, our main
7 mission is student success. We have to meet
8 programmatic outcomes as established by the CPME
9 so we can't just let anybody in.

10 In terms of recruitment, yes, that's
11 done by all the different colleges as well as the
12 American Association of Colleges of Podiatric
13 Medicine.

14 They have a strategic plan, metrics,
15 and various means of reaching out to prospective
16 students and just university visits and other
17 programs they might hold for visiting prospective
18 students at their own institutions. I don't know
19 if that answers --

20 R. SHIREMAN: Yeah. Your materials
21 mentioned that you count -- periodically review
22 the publications of accredited institutions for

1 possible, like, misleading or inaccurate
2 information.

3 Does that include advertising and
4 recruiting materials that institutions are using?
5 Is that a regular activity, like, sort of
6 shopping and checking and making sure that
7 they're being accurate in their advertising?

8 H. STAGLIANO: Absolutely. What we do
9 is we look at their websites and we do that as a
10 staff, and then the Accreditation Committee will
11 look at that when they meet twice a year.

12 But the staff, I would say, look at
13 those websites every two or three months and just
14 browse around as if I were a prospective student
15 to see how do I -- what does this information
16 look like? You know, what is my understanding of
17 what's happening?

18 And then if I see anything that is
19 just kind of off or, you don't, maybe it's a
20 typo, maybe it's misleading or something -- I
21 haven't seen anything misleading -- but, you
22 know, maybe it's a typo or something, I'll

1 contact that dean and, you know, just mention to
2 them, by the way, I noticed on your website you
3 should -- you know, the correct way to do that is
4 this and then they immediately correct it.

5 And I'm able to have that type of
6 relationship with the deans because there are
7 only nine of them and so I feel that they're very
8 responsive and they know that we're looking at
9 the website. I mean, if there's any errors
10 they're quick to resolve that.

11 R. SHIREMAN: Got it. Thank you. I
12 just wanted to signal Art that I had let the
13 staff know that I wanted to -- that I had a
14 couple of questions more generally about a couple
15 of things that I just asked CPME about. So I'll
16 want to ask Elizabeth. I guess that's a later
17 thing. But just wanted to mention that.

18 CHAIR KEISER: Yeah. That would work
19 when Elizabeth has her response.

20 Wally, then Jennifer.

21 W. BOSTON: Thank you, Art.

22 So another question for the agency,

1 which is the -- this past summer, the Wall Street
2 Journal created a unique tool looking at new data
3 that the college scorecard made available,
4 although the college scorecard focuses more on
5 undergraduate programs related to graduate
6 programs and the debt to income ratio.

7 And in professional programs,
8 specifically, in many of the professional
9 programs, the ratio of debt to income exceeded
10 the debt for many institutions and in some
11 institutions' cases ratios as high as seven to
12 one debt to income.

13 Are you all contemplating, with this
14 data now available, looking at a tool to add to
15 your reporting requirements that looks at a debt
16 to income ratio?

17 Because I would think that in a
18 profession like podiatry it'd be pretty important
19 to make sure that the graduates of your programs
20 are earning enough to repay their average debt.

21 H. STAGLIANO: It's not something that
22 we have specifically discussed. It's something

1 that we monitor.

2 When students finish their four years
3 of podiatric medical school, they enter a three-
4 year residency, and then following residency is
5 when they would go in and, you know, achieve
6 their much higher-paying job. You know, but
7 they still serve those three years as a resident.

8 So even though we know that their --
9 the average debt is \$218,000 across all of those
10 schools, but we know that they have high incomes
11 once they complete their residency, and Dr. Cook
12 can provide you with a little bit of that range
13 of what we see is happening.

14 So that would be something that we
15 could look into adding. It would -- it would
16 just, you know, be a lagging time line just
17 because once they finish their school they go
18 into the residency for three years, and then we
19 would have to look at what their incomes are.

20 K. COOK: Thank you, Dr. Stagliano.
21 I'd be more than happy to.

22 As Dr. Stagliano mentioned, following

1 four years of podiatry school the students then
2 enter a residency program for three years, the
3 salaries of which vary throughout the country
4 based on location, some that are as high as
5 \$70,000 to \$80,000 per year.

6 Following graduation of the residency
7 program, the podiatry profession, at least from
8 some of the labor statistics that are provided,
9 the median salary from the Bureau of Labor
10 Statistics is about \$135,000.

11 Depending upon the source that you
12 utilize, and you could go on -- if you go on the
13 internet and look at a salary.com type of
14 website, that the median salary is greater than
15 \$200,000.

16 Reviewing the MGMA data, the median
17 salary for all podiatrists, whether they're
18 surgical or nonsurgical, is \$225,000 in
19 compensation with the 10th percentile at
20 \$134,000.

21 So there is the ability -- even though
22 students may graduate with debt, there is the

1 ability to be able to pay that back.

2 W. BOSTON: Thank you.

3 CHAIR KEISER: Good. Jennifer?

4 J. BLUM: Thanks. So and I also, like
5 Bob, have a question for Elizabeth afterwards as
6 well. I just wanted to mark that.

7 So I've learned a lot about podiatry
8 in that -- so one real, I think, interesting
9 point, and I'm struggling with what the question
10 is, but the connecting of Bob's questions and
11 Wally's first question about the grad rate issue.

12 With only nine institutions, you know,
13 I get -- and this is -- you know, it gets a
14 little concerning in certain -- I'm a big
15 advocate of peer review. But with only nine, it
16 would think -- I would think that things like
17 your commission makeup would become of more
18 import.

19 And so I guess the question I have is
20 have you thought about having more public
21 members? Because, of course, you have the
22 discretion to have more public members than you

1 do.

2 And then I guess I have a question
3 about the grad rate change that Wally referenced.
4 What is your process for making a change to what
5 the threshold grad rate or any outcomes rate is
6 in terms of does that go through the commission
7 for approval? What is that process?

8 H. STAGLIANO: Sure. For your first
9 question, we haven't talked about increasing the
10 number of members on the Council because we find
11 it to be adequate and, you know, having three
12 public members is really beneficial, as I
13 mentioned earlier. But that's something for us
14 to think about.

15 For the graduation rate or any change
16 in our standards, every six years we go through a
17 comprehensive review that requires an ad hoc
18 committee.

19 So the last time we did that we
20 started in 2017. Put together an ad hoc
21 committee. They created draft one.

22 Well, first, they'd go out to the

1 community of interest and gather data on, you
2 know, what's working, what's not, with the
3 standards, and then they work on putting together
4 draft one, and then that goes to the Council and
5 they have to approve that and that then goes out
6 to the community of interest for comment.

7 So we would say, here's draft one --
8 what do you think about it? And so we have an
9 open comment period, and then when all of that
10 feedback comes back it goes to the Council and
11 then they determine, okay, do we need to tweak
12 anything here or are -- is the community saying
13 enough where we need to bring it back to the ad
14 hoc and tell them to work on draft two.

15 And so that's what happened in 2017.
16 They worked on draft two. Same process. Council
17 approved draft two. Goes out to the community of
18 interest for comment.

19 Comments come back and we -- and then
20 the Council said, okay, we're in pretty good
21 shape, we're ready to go, and they adopted those
22 documents in 2019.

1 And so that was the process that
2 happened to change that graduation standard. And
3 as I mentioned earlier, we just found it to be
4 unfair because schools did not know if they would
5 be in or out of compliance.

6 I would have to calculate all the data
7 that came in from the annual report to determine
8 the mean, standard deviation, and then say, oops,
9 you're out of compliance, and then the next year
10 they wouldn't know if they came into compliance
11 or not.

12 I mean, they, of course, are working
13 to increase their graduation rate. But they
14 wouldn't know exactly where that mark was because
15 it was constantly changing year to year.

16 And so that's the reason that the
17 change took place. But it went through that
18 entire process of out to the community of
19 interest, call for -- either the call for
20 comment, ad hoc committee, all of that.

21 J. BLUM: So I do -- I just want to
22 say one thing about the not knowing. That's true

1 across all agencies of different types that have
2 outcomes metrics.

3 There is an element of the unknown
4 that goes part and parcel. Just a thought that I
5 have is that might have to do more with how you
6 handle it if they're out of compliance. I'm not
7 sure you move -- especially when you only have
8 nine schools, which, to me, is, you know, another
9 commentary that's not related necessarily.

10 But when you only have nine
11 institutions, I don't -- I hesitate to say that
12 the solution is to then move the bar, you know,
13 to a easier place.

14 It might be how do you handle the
15 school that's not in compliance. It's just food
16 for thought but it did -- I have to say in the
17 universe -- in the subjective qualitative
18 universe of this agency, it gives me a little bit
19 of pause because you're working in a very small
20 universe. So I'll just leave it at that. I do
21 have a question for Beth later.

22 CHAIR KEISER: Sorry. I was on mute.

1 Kathleen?

2 K. ALIOTO: This is not really a
3 question about the intricacies of the job that
4 you do. I talked with some podiatrists about the
5 agency and they thought that you do, by and
6 large, a good job.

7 But their concern was the connection
8 to the AMA and working with doctors, and I'm
9 wondering, it's kind of outside -- certainly,
10 outside of what the Department had to look at.

11 But they can -- it was interesting.
12 One was in Boston, the other in San Francisco,
13 and they both had the same concern about what
14 happens medically for patients because of a
15 political -- not getting together.

16 H. STAGLIANO: Are you talking about
17 the AMA, the American Medical Association, or a -
18 -

19 K. ALIOTO: Yes.

20 H. STAGLIANO: Okay. I would say on
21 the -- so CPME doesn't get involved in those
22 types of politics. But they're -- the American

1 Podiatric Medical Association, which is our
2 parent organization, is always looking for parity
3 with the MDs and DOs, and Dr. Cook might be able
4 to provide more insight into what that may look
5 like in practice.

6 But I just -- I really can't comment
7 on it because it's more of a political issue with
8 our parent organization.

9 K. ALIOTO: Okay. Thank you. I know
10 it was outside the box. Thank you.

11 CHAIR KEISER: Okay. Any other
12 questions? Seeing none, I'd like to bring Beth
13 back.

14 E. DAGGETT: Thank you, Dr. Keiser.
15 I'm going to try to answer some of the questions
16 that I believe are out there, in particular one
17 from Bob Shireman.

18 So one of the ones he had requested
19 earlier was a discussion about any public members
20 and whether or not agency employees could serve
21 in that role.

22 There is nothing -- the answer to the

1 question is no, a current staff member could not
2 serve as a public member. That, I mean, is not
3 explicitly spelled out in the regulations. But
4 staff would be very concerned if we were to see
5 something like that.

6 I'm not aware, even in this example
7 for CPME, of any staff member who is a current
8 staff member who is serving as a public
9 representative, not to mention the fact that that
10 would be like the governing board -- you know,
11 somebody on the governing board then also being
12 staff for that same board.

13 But also going to this specific
14 example, that prior staff member, first of all,
15 as Dr. Stagliano states, it was somebody who
16 worked for APMA, the larger organization, and
17 also their last -- their term of employment ended
18 in 2008.

19 So it was over 10 years ago when that
20 happened, and I would dare to say that -- and
21 then now they've moved on to a different medical
22 association where they served in different roles.

1 I would dare to say that that person
2 probably provides some additional guidance
3 because they have that experience, having worked
4 with APMA in the past but then now have also
5 worked with a different medical association to be
6 able to provide some of the added information in
7 a larger public view.

8 So I would say that, you know, a
9 current staff member, no, they could not be a
10 member -- a public representative on the board.

11 I think the second question was about
12 recruiting and advertising. We usually -- as
13 staff, we take in a holistic view. We're looking
14 at the standards that are -- they're expected to
15 assess quality in those areas.

16 And as CPME noted, they are a very
17 small organization so they're able to have a very
18 specific one-on-one individual view. And so our
19 -- the review of CPME would definitely be
20 different than a much larger, you know,
21 institutional agency that has a much larger
22 membership.

1 But we don't have any specific
2 requirements to look at in each area but we do
3 have -- we do expect them to have standards that
4 they look at and then we look at the
5 implementation of those standards.

6 You know, they have to have the
7 standards and give examples of what they review
8 in 60216. 60217 requires them to implement
9 those. 60218 requires consistency in that
10 review.

11 So there does have to be some -- those
12 elements met in order for them to be able to
13 demonstrate compliance in that area. You know,
14 meaningless standards would have no bearing on
15 the quality of education.

16 So, you know, we would not look at
17 something that was meaningless and think that,
18 yes, just because you have something written down
19 on paper that that would be sufficient.

20 And then I'm trying to think --
21 Jennifer -- I don't know what her question is. I
22 think it's going to be related to number of

1 committee members and diversity of the peer
2 reviewers, but I'm not sure. So I'm going to
3 defer.

4 Other than that, I don't have any
5 other comments related to the agency. But I'm
6 happy to answer any questions that the committee
7 might have.

8 R. SHIREMAN: Art, can I --

9 CHAIR KEISER: Bob, raise your hand,
10 if you would. Bob, and then Jennifer.

11 R. SHIREMAN: Thanks. Thank you,
12 Elizabeth. I just want to make sure I heard you
13 correctly.

14 So for something like the recruiting
15 and advertising question, even though I don't
16 think explicitly in that section of the
17 regulations it says that their standard has to be
18 good or quality or have integrity or anything
19 like that, you would look at what the content of
20 the standard is and make a judgment call on the
21 question of does this promote quality as opposed
22 to, you know, are they -- is it just a

1 requirement of font size or something like that
2 in the advertising.

3 So, A, do I understand that correctly,
4 and then B, did you find what -- in CPME's
5 standards did you find something that you would
6 consider to be a standard on recruiting
7 advertising?

8 E. DAGGETT: To answer the global
9 question, I mean, the statute itself requires
10 that an accrediting agency has to have standards
11 to assess an institution and it's in all those
12 specific areas, and one of those is related to
13 recruiting and admissions practices.

14 So we would, therefore, definitely
15 look to see what kind of standards did the agency
16 have with regards to advertising and recruiting
17 and whether or not they're implementing those
18 standards.

19 Specific to CPME, they have standards
20 and policies where they do review not just that
21 their, you know, renewal of accreditation reviews
22 and then the specific examples they provided.

1 They have, you know, the self-study
2 and then the team report, and the team report,
3 clearly, states that they reviewed the admissions
4 and recruitment materials that are provided.

5 And then also, as Dr. Stagliano said,
6 they also have a monitoring where she, you know,
7 goes through on a regular basis, which is also
8 reflected in the petition -- goes through on a
9 regular basis to review what information and
10 documentation -- or what information is being
11 posted on the website, and she contacts each of
12 those, you know, programs or institutions
13 individually, which -- you know, obviously, the
14 implementation of a review of this particular
15 standard or any standard is going to differ,
16 depending on the agency.

17 She has the luxury of having nine
18 programs that she works with versus some of our
19 other much larger agencies. That would not be
20 the best use for them to be able to do that
21 because the manpower wouldn't allow for that.

22 But each agency is looked at their own

1 -- under their own regard -- under their own
2 standards with regard to whether or not they have
3 demonstrated that they have -- are assessing
4 institutions or programs in these specific areas.

5 R. SHIREMAN: Thank you.

6 CHAIR KEISER: I have a question to
7 Elizabeth. It was interesting on the discussion
8 of the effect of the pandemic upon bright lines.

9 How is the Department looking at those
10 bright lines, especially in light of the
11 pandemic, especially in light of lack of clinical
12 facilities in many of the allied health areas?

13 And have we given guidance or do we
14 give guidance or is there guidance on how an
15 agency that has bright lines in -- you know,
16 recognizes the impact of the pandemic?

17 E. DAGGETT: That's a good question.
18 We haven't specifically run into where the
19 pandemic -- I haven't seen in the institution --
20 in the -- I'm sorry, the agencies that I review I
21 have not seen a specific, you know, change with
22 regards to their review of, like, such a student

1 achievement standard based on the pandemic.

2 I would dare to say that any agencies
3 who have issues with that would provide that
4 information within the petition or in a response
5 to the petition and describing that.

6 I have had other -- I have had
7 agencies, including CPME, discuss the changes
8 that they've made based on their reviews. I was
9 actually one of the people doing the virtual
10 review of that December 2020 site visit where
11 some -- you know, they had a staff member on site
12 and seeing how that was done.

13 I don't think that we have anything
14 particular and specific for waivers or any other
15 kind of guidance related to a specific benchmark
16 -- you know, if a agency has specific benchmarks
17 regarding student achievement, what -- how we
18 would look at that.

19 We do have -- you know, we're looking
20 at each agency individually. So it would just
21 depend on the agency when they came forward if
22 they had issues and then they would provide, you

1 know, information and documentation regarding
2 any, you know, issues they may have faced with
3 regard to the pandemic.

4 CHAIR KEISER: Because the reason I
5 ask that is we're now two years into the
6 pandemic. We will have closed two years ago
7 March 13th, and in certain states some of these
8 schools are still very much online and it will
9 have an impact on the learning. So I'm just
10 curious that we're going to see this over the
11 next few years and it's something we may want to
12 discuss somewhere, maybe when we get to the
13 policy decision. Because it is a concern, I
14 think, especially for --

15 E. DAGGETT: Oh, I think --

16 CHAIR KEISER: Go ahead.

17 E. DAGGETT: Yeah. No, I agree. I'm
18 sorry, Dr. Keiser. I agree, and I think it also
19 speaks to, you know, what Dr. Boston and also Dr.
20 Stagliano talked about the lagging student
21 achievement standards and how these things -- you
22 know, we're not going to see it -- you know,

1 these standards are not -- we're not going to see
2 that today. Those are probably things we're
3 going to see in a couple of years.

4 So I don't think -- you know, the
5 Department does not have an answer for that and
6 I'm sure it's something, you know, that we would
7 definitely look at. So --

8 CHAIR KEISER: Herman?

9 H. BOUNDS: Yeah. I just want to say
10 I think Beth summed it up pretty nicely about
11 what we would do in those situations. You know,
12 we would, again, look at, you know, what an
13 agency provided, look at -- to see if that
14 information -- if their actions were reasonable
15 based on, you know, the climate, whether it be
16 COVID or some other economic issue.

17 So, again, I think, as Beth said, it's
18 going to be an individual look and a lot of
19 conversations with the agency and then to look to
20 see if they follow whatever policies they have
21 regarding standards changes, which in this case
22 this agency has done that.

1 So, again, I think it would just be an
2 individual approach to each agency.

3 J. BLUM: Art, can I go ahead? You're
4 on mute.

5 CHAIR KEISER: I'm muted. Thank
6 goodness my phone went off at the same time.
7 You're up, Jennifer.

8 J. BLUM: Okay. So, Elizabeth, my
9 question actually was different. It was -- or
10 maybe in the same vein.

11 So can you remind me? The separate
12 and independent is one of those criteria where we
13 often see when we're reviewing agencies that
14 they're allowed to attest, you know, that nothing
15 has changed.

16 Can you remind me? Am I correct that
17 there's a change -- there will be a change where
18 they're no longer going to be able to attest to
19 that? Or can you just remind me on that?

20 Because, again, I mean, I will say
21 this is another example. I mean, you know, when
22 there's only nine -- when there are only nine

1 programs and there is a tie.

2 I know it's the separate and
3 independent clause, but it's hard for there not
4 to be at least some connective tissue because
5 there are only nine programs.

6 And so, to me, this is an important
7 space and I -- you know, it's not just about this
8 agency but I -- you know, when I go through the
9 agencies I do get frustrated with the
10 attestations because a lot can happen in five
11 years and it's, like, oh, nothing's changed
12 except for that we had a pandemic and there are
13 only nine podiatry schools in this country and
14 they're very selective.

15 And so I do think about -- I will say
16 also this is as an aside, you know, again,
17 something that the Under Secretary said about
18 sort of selectivity and elitism.

19 I think this is an important area to
20 sort of be attuned to and if the agencies are
21 just attesting, you know, it's not about this
22 agency, but I take issue a little bit with the

1 attestation.

2 So can you just refresh my memory on
3 how that all works?

4 E. DAGGETT: Yes. This is the last
5 time you'll see that, this meeting. So you can
6 be happy about that, Jennifer.

7 This was the last set of agencies that
8 submitted prior to the change in regulation. So
9 every agency, going forward -- so at the July
10 meeting, all of the agencies will have to respond
11 to every section.

12 With regard to separate and
13 independent, yes, you're correct that they were
14 not required to respond to this section.

15 As Dr. Stagliano noted, that we have
16 been in discussions over the fact that they are
17 probably going to move from being a Title IV
18 gatekeeping agency, potentially, to then being a
19 programmatic and then in which case then separate
20 and independent would not apply.

21 So then it would -- so then it would
22 not matter at that point. But yes, they were

1 allowed to attest that there were no changes.
2 This is the last set of agencies that were
3 submitted prior to the regulatory changes that
4 we're able to do that.

5 J. BLUM: Can I just say one thing,
6 Art? I want to say this just for the benefit,
7 because I'm probably not going to be on the
8 policy conversation, unfortunately, tomorrow.

9 This is an area -- the fact that --
10 and I know it might be statutory, although I'm
11 not sure it is -- the separate and independent
12 not applying to programmatic, whether it's a
13 legislative switch that's needed, whether it's a
14 regulatory issue, to me, this is a big policy
15 issue.

16 I don't quite understand why in the
17 professional sort of context we wouldn't want at
18 least some delineation between trade associations
19 and the accrediting body.

20 So I'm just flagging that for the
21 record, even though I know that's a better policy
22 conversation for tomorrow.

1 CHAIR KEISER: I'm pretty sure that's
2 statutory, right, Herman?

3 H. BOUNDS: That's a regulatory
4 separation between Title IV gatekeepers and
5 programmatic agents. They don't have to comply
6 with separate and independent. So that will
7 require -- that will require a rulemaking and a
8 regulatory change.

9 CHAIR KEISER: Okay. Thank you, Beth.
10 Did you have anything else you wanted to say,
11 Herman?

12 H. BOUNDS: Nope, that's it. I'll
13 take my hand down.

14 CHAIR KEISER: I will now open the
15 floor for either Roslyn or Wally to make a
16 motion.

17 R. CLARK ARTIS: This is Roslyn Artis.
18 I move that the NACIQI recommend the senior
19 Department official approve the American
20 Podiatric Medical Association Council on
21 Podiatric Medical Education for renewed
22 recognition for a period of five years.

1 CHAIR KEISER: Is there a second to
2 the motion? Someone want to second?

3 W. BOSTON: I second it.

4 CHAIR KEISER: Who is that? I'm
5 sorry.

6 W. BOSTON: Wally. I want to second
7 it.

8 CHAIR KEISER: Wally? Okay. Further
9 discussion? I see no discussion. I will move
10 the motion.

11 Is there a vote in favor of the
12 motion? Please signify by raising your hand on
13 the machine. One, two -- no, are we doing -- I'm
14 sorry. George, are we doing a voice vote?

15 PARTICIPANT: A roll call.

16 CHAIR KEISER: A roll call? Yeah,
17 let's do a roll call. I'm sorry.

18 Kathleen?

19 K. ALIOTO: Yes.

20 CHAIR KEISER: Roslyn?

21 R. CLARK ARTIS: Yes.

22 CHAIR KEISER: Jennifer?

1 J. BLUM: Yes.

2 CHAIR KEISER: Ronnie?

3 R. BOOTH: Yes.

4 CHAIR KEISER: Wally?

5 W. BOSTON: Yes.

6 CHAIR KEISER: Jill?

7 J. DERBY: Yes.

8 CHAIR KEISER: David?

9 D. EUBANKS: Yes.

10 CHAIR KEISER: Michael Lindsay?

11 M. LINDSAY: Yes.

12 CHAIR KEISER: Molly?

13 M. HALL MARTIN: Yes.

14 CHAIR KEISER: Robert?

15 R. MAYES: Yes.

16 CHAIR KEISER: Mary Ellen?

17 Mary Ellen?

18 M. E. PETRISKO: Yes.

19 CHAIR KEISER: I'm sorry.

20 M. E. PETRISKO: It's okay.

21 CHAIR KEISER: Michael Poliakoff?

22 M. POLIAKOFF: Yes.

1 CHAIR KEISER: Bob?

2 R. SHIREMAN: Yes.

3 CHAIR KEISER: Steve?

4 S. VAN AUDDLE: Yes.

5 CHAIR KEISER: All right. The motion
6 carries.

7 It is 12:05, approximately. George,
8 do you think we should take our lunch and then
9 come back in an hour?

10 G.A. SMITH: If you all are
11 comfortable with that. It's whatever you want.
12 So that works fine if that works for you all.

13 CHAIR KEISER: Does that work for
14 everybody?

15 K. ALIOTO: Yes.

16 CHAIR KEISER: Okay. It is 12:05.
17 We'll come back at 1:05 and we will begin the
18 conversation with the North Dakota Board of
19 Nursing.

20 K. ALIOTO: Thank you.

21 CHAIR KEISER: We stand adjourned for
22 an hour. Thank you.

1 (Whereupon, the above-entitled matter
2 went off the record at 12:07 p.m. and resumed at
3 1:06 p.m.)

4 CHAIR KEISER: Welcome back,
5 everybody, we have a busy afternoon, review of
6 two agencies, at least that's what we'll do and
7 we may look at the time later on and speed up the
8 agenda.

9 But the first is a renewal of
10 recognition for the North Dakota Board of
11 Nursing. The NACIQI primary readers are Kathleen
12 Sullivan Alioto and David Eubanks. The
13 Department staff is L.G. Corder and the agency
14 representative is Dr. Tammy Buchholz. I'd like
15 to invite the primary readers to introduce the
16 agency.

17 D. EUBANKS: Thanks, Art, I'll do
18 that. North Dakota Board of Nursing is
19 authorized by the states to regulate nurse
20 education programs.

21 The Board's published mission is to
22 assure North Dakota citizens quality nursing care

1 through the regulation standards for nursing
2 education, licensure, and practice.

3 The Board of Nursing approves
4 graduate, baccalaureate, and associate degree
5 programs to prepare individuals for registered
6 nurse licensure and associate degrees and
7 certificate programs for practical nursing.

8 The Board was first recognized by the
9 Department in 2002 and has been continually
10 recognized since that time, the most recent
11 recognition was in 2018, so four years.

12 CHAIR KEISER: Thank you, David. I'd
13 like to bring up our staff member, L.G. Corder.

14 L.G. CORDER: Thank you. Good
15 afternoon, Chairman and members of the Committee,
16 my name is L.G. Corder and I am presenting our
17 review of the petition for continued recognition
18 submitted by the North Dakota Board of Nursing.

19 The state's recognition for its
20 accreditation of nursing programs does not
21 include access to Title IV HEA programs. The
22 staff recommendation to the senior Department

1 official is to renew the agency's recognition as
2 a nationally recognized state approval agency for
3 nursing education for a period of four years.

4 Based on a review of the information
5 in the agency's petition, as well as virtual
6 observations of a board meeting and a site visit,
7 Department staff found that the North Dakota
8 Board of Nursing is in compliance with the nurse
9 education criteria published in the 1969 Federal
10 Register notice with no issues or concerns.

11 The Department did not receive any
12 complaints nor written third-party comments
13 during the review cycle regarding the agency.
14 Therefore, the staff recommendation to the senior
15 Department official is to renew the agency's
16 recognition for a period of four years.

17 A representative from the agency is here today
18 and I am happy to answer any questions you might
19 have. This concludes my report, thank you.

20 CHAIR KEISER: Any questions to the
21 staff at this point?

22 D. EUBANKS: Just a clarification, for

1 information the criteria here for 34FR587, not
2 602, and so it looks different from the criteria
3 we normally discuss in 602.

4 L.G., you may want to verify that.
5 That's my understanding.

6 L.G. CORDER: That's correct.

7 CHAIR KEISER: Thank you,
8 representative of the agency, you have the floor.
9 I have to find you, I lost you. Dr. Buchholz,
10 there you are.

11 T. BUCHHOLZ: Can everyone hear me?

12 CHAIR KEISER: We can.

13 T. BUCHHOLZ: Wonderful. Good
14 afternoon, Chairman Keiser and members of the
15 Committee.

16 For the record, my name is Dr. Tammy
17 Buchholz and I am board staff and have served in
18 the position as Associate Director for Education
19 for the North Dakota Board of Nursing for the
20 past seven years.

21 The mission of North Dakota Board of
22 Nursing is to assure North Dakota citizens

1 quality nursing care through the regulation of
2 standards for nursing education, licensure and
3 practical.

4 Through North Dakota's century code
5 and administrative code, the North Dakota Board
6 of Nursing is given the authority to monitor pre-
7 licensure nursing education programs as part of
8 that charge.

9 As Mr. Corder described, the United
10 States Secretary of Education granted official
11 recognition to the Board of Nursing as a
12 nationally recognition state approval agency for
13 nurse education in 2002.

14 The initial period of recognition was
15 for two years with recognition being granted in
16 June of 2004 and continued recognition being
17 sought by the Board of Nursing and being granted
18 by the Secretary every four years since that
19 time.

20 The NDBON considers the Department of
21 Education recognition process an important
22 component of continuous quality improvement which

1 provides assurance of the rigor and the soundness
2 of the evaluation processes in place for nursing
3 education programs in North Dakota.

4 As staff for the North Dakota Board of
5 Nursing, I appreciate your time and your
6 commitment to quality and fair education.

7 I would like to thank the Committee
8 and the Department of Education's staff, Mr. L.G.
9 Corder, Mr. Michael Stein, and Ms. Valerie Lefor
10 for the robust review of the Board of Nursing
11 survey processes and annual review of pre-
12 licensure nursing education programs in North
13 Dakota.

14 Thank you.

15 CHAIR KEISER: Thank you very much.
16 Do our primary readers have questions for the
17 agency?

18 D. EUBANKS: Yes, Kathleen, if it's
19 okay with you, I have a couple of questions I
20 could start with and then turn it over to you.

21 Thanks to the Department staff and to
22 Dr. Buchholz and your team for putting together a

1 comprehensive report with lots of very
2 interesting exhibits.

3 I read it through with special
4 attention to student achievement and the
5 standards focus quite a bit on that.

6 I noted that the Board has what are
7 sometimes called bright line pass rates for
8 licensure exams and their rates cited in the
9 annual reports around 80 and 90 percent.

10 I looked up the national pass rates by
11 the testmaker and the Board's cited figures
12 compared quite favorably to those. I realize
13 this is all in the before times, most of the data
14 is before COVID-19 and things may have changed.

15 But I'll stick to the data that's in
16 the report. So, my first question is about
17 graduation rates.

18 The criteria in FR587 asks for numbers
19 of graduates and I tried to work backwards to
20 figure out what the cohort sizes are in order to
21 find out what the graduation rates are.

22 I don't have any confidence in my

1 ability to do that. So, Dr. Buchholz, I wonder
2 if you'd comment about what graduation rates
3 typically are, if that's an appropriate question,
4 and how the Board navigates issues with
5 graduation rates.

6 Is there a bright line for that? Or
7 just how do you handle it?

8 T. BUCHHOLZ: Thank you for the
9 question. I have to be honest with you with
10 regards to your reference to bright line. I'm
11 not familiar with that terminology.

12 Certainly, graduation rates, as they
13 apply to North Dakota programs in the state, that
14 is something we monitor closely as part of every
15 annual nursing education report. And we watch
16 that trending.

17 Just last week I provided an update
18 with regards to the graduation, nurse graduate,
19 rates in North Dakota and what we did see was not
20 just a decrease in graduation rates, but actually
21 they held steady during the pandemic these past
22 two years.

1 But what we did see was somewhat of a
2 decrease in enrollments during that time and so
3 we certainly attribute some of the slight
4 decrease in graduation rates to that.

5 What we find is that with nursing
6 programs, the problem is usually there are not
7 enough slots for individuals who are interested
8 and the graduation of those individuals is very
9 high, who are enrolled, admitted, and enter a
10 program and move through the program.

11 So, percentage-wise if you want me to
12 give you some numbers, I certainly can look those
13 up but I can tell you that they have held steady
14 and in fact, they increase.

15 Our legislature really put an
16 initiative or asked for an initiative for nursing
17 education programs to really try to be creative
18 about how they could increase numbers to help
19 with the nursing shortage.

20 And that happened several years ago
21 pre-COVID-19, and our programs did an astounding
22 job at doing that with limited resources.

1 And so really what we saw was that
2 programs decided they were going to do a two a
3 year admission, so admitting in the fall, as
4 typically with the traditional program, and then
5 also admitting in spring.

6 So, we did see numbers significantly
7 go up, both for enrollments, admissions, and then
8 also graduations as a part of that. I don't know
9 if I've answered your question, I'm certainly
10 able to provide more information if you need it.

11 D. EUBANKS: That's great background.
12 It would be nice to know what sort of range the
13 graduation rates is but I understand you don't
14 have that immediately available.

15 And you anticipated my next question,
16 really, which was about the admissions process.

17 Some of the numbers that are includes
18 in the annual report show and are pretty
19 transparent with respect to the admissions fall,
20 which is how many students apply, how many were
21 qualified, how many were admitted, and so forth.

22 So, that's all great, really

1 interesting. The standard that explicitly
2 mentions admission criteria talks about enforcing
3 ethical standards.

4 And the narrative in that section is
5 fairly succinct and it seems to address more of
6 the public availability of policies like
7 enforcing the transparency, which I understand.

8 But it seemed like not quite rising to
9 the level of enforcing an ethical standard, so
10 that section seemed light to me. The analysts
11 didn't seem to think so because it was fine.

12 But when I looked at the actual
13 evidence that was submitted, the pre-survey,
14 which I think was a self-study example, has a lot
15 of information about this particular program
16 using a pre-test to sort out the Applicants and
17 assiduously try and figure out which students are
18 going to succeed.

19 And there's even a special provision
20 for non-English speakers who choose standardized
21 test called the TOEFL, where they have
22 conditional success rates based on TOEFL scores.

1 So, students are fully informed and
2 this program is doing quite a bit of analytical
3 work on the front end to understand how the
4 admissions criteria affects students.

5 So, my question is that program is
6 obviously, to me, an A+ example of showing their
7 commitment to enforcing ethical standards.

8 Is that true across the board because
9 a couple of the smaller programs had very high
10 admit rates, like even 100 percent admit rate.
11 Is that just because they're getting such highly
12 qualified applicants, or anything you could speak
13 to in that area?

14 T. BUCHHOLZ: Thank you for that
15 question. I think first I'll start with the
16 ethical component. That's something that we are
17 very concerned about when we go in and do our
18 surveys.

19 In particular, I'll share an
20 experience this past fall. Praise God, we were
21 able to go on site again because some
22 restrictions had been lifted and so we were

1 actually in the environment.

2 And we had great success with doing
3 some of our surveys during the pandemic virtually
4 rather than going on site.

5 And what we found was we had several
6 meetings with students and one of the meetings
7 with students was very interesting in that they
8 shared a lot of great things about the program.

9 But there were a few brave souls who
10 did speak up, in particular this was about his
11 scholarship opportunity that was put out there as
12 somewhat of a recruitment draw or used for
13 recruitment.

14 And they discussed before from another
15 state and getting to this particular university
16 program and having some of the ground shift under
17 them with regards to their eligibility.

18 And so we did spend quite a bit of
19 time looking at that and we find often there's
20 something like that, we always want to listen to
21 the students, take their information, and then
22 ask further questions of whoever has oversight

1 over some of those policies, whether it be the
2 marketing, whether it be the chief financial
3 leadership individual, or president of the
4 university, however we need to get the
5 information.

6 But it was very interesting and it was
7 a surprise to me that some of these students were
8 verbalizing this to us and they hadn't been able
9 to find a way to get through it. So, certainly
10 in our findings we asked that be addressed.

11 And so with regards to ethics, I guess
12 that particular incident stands out just from the
13 most recent surveys that we did. So, we take
14 that very seriously.

15 On the other hand, when you ask about
16 admissions, you hit that nail right on the head
17 with regards to the quality of the candidate who
18 is applying to a nursing education program.

19 Most of the candidates are highly
20 qualified and many of these programs have had to
21 or do, I guess all of them do, have their
22 particular criteria, their policy in place for

1 how they go about determining their admissions,
2 who is going to get into the program.

3 The students that you referred to, the
4 increase in diversity that we hope to see more of
5 in North Dakota, because unfortunately it is a
6 very homogeneous state, we're glad those things
7 are changing in our state.

8 But we recognize there still are some
9 challenges especially for, as you brought up,
10 English is a second language for.

11 And so programs certainly have purview
12 to determine their policies with regards to
13 admissions but also making sure that they are
14 very mindful of, again, that fairness, that
15 ethical comportment and that, all things
16 considered, everyone is being looked at and
17 considered equally.

18 Again, if I didn't quite get that,
19 please let me know what else I can provide.

20 D. EUBANKS: That was very helpful.

21 The thing that I would wish for that
22 we can't have is the line in the annual report

1 that says the number of students we wish we could
2 admit and admitted but we didn't have space to
3 admit.

4 That would be great, that would answer
5 my question. Thank you so much. Kathleen, I'll
6 turn it over to you.

7 K. ALIOTO: Yes, I found it a
8 challenge to come up with the numbers of colleges
9 and universities and students that you serve.

10 So that the Committee can have a range
11 of this, how many? Is it 15 schools that you
12 serve?

13 T. BUCHHOLZ: It is a total of 13
14 institutions. There are 17 programs because a
15 group of 4 community colleges formed a consortium
16 and so those 4 colleges fall under what's called
17 the Dakota Nursing Program Consortium.

18 And so we do have 13 institutions that
19 offer programs but 17 programs within that. We
20 have graduate-level programs for advanced
21 practice registered nurses.

22 There are 3 institutions that offer

1 graduate-level programs and then we have 7
2 programs that offer baccalaureate degrees for the
3 registered nurse.

4 And then we have other programs that
5 offer 2-year associate degrees for registered
6 nurse licensure. And then we also have our
7 practical nursing programs.

8 There are 4 that are a 1-year
9 certificate but we also have, and this is our
10 claim to fame in North Dakota, 2 programs in our
11 state that offer 2-year associate degree
12 practical nursing programs and that is a bit of a
13 holdover from the years, about 12 years, where
14 entry into practice into North Dakota required a
15 baccalaureate degree for an RN and an associate
16 degree for a practical nurse.

17 And that was rescinded in our long
18 rules but we hold that honor if you want to refer
19 to it.

20 K. ALIOTO: And so what is your total
21 number?

22 T. BUCHHOLZ: Of programs?

1 K. ALIOTO: Of people, of students.
2 I know you have the different categories.

3 T. BUCHHOLZ: I have the numbers of
4 enrollments that I had so I have these in front
5 of me. From 2020, 2021, the enrollments were
6 2151 students and that was actually up from the
7 year prior, 2072 the year prior.

8 Total graduates that we had in 2020,
9 2021 were 955 graduates. And again, that was up
10 from the previous Fiscal Year of 2019, 2020 and
11 that number previously was 873.

12 So, we have seen a steady increase in
13 our numbers of nurse graduates and enrollments as
14 I mentioned in relation to programs offering 2-
15 year admission.

16 K. ALIOTO: So, your graduation rate
17 would be somewhat less than 50 percent, depending
18 on where it would be?

19 T. BUCHHOLZ: Right, it's not so
20 easily teased out as that because of the
21 different levels of licensure. That would be all
22 graduates, that would include the APRNs, the RNs,

1 and the PN programs.

2 And so the different timeline for each
3 of those is going to look different each year.
4 enrollments are from the time they're enrolled.

5 K. ALIOTO: Thank you.

6 Next question is the passing standard
7 for net-flex, you have high rates of passing but
8 when I looked into what net-flex was vis-a-vis
9 the quality question that Steve is concerned
10 about, and we're all concerned on this Committee,
11 the passing standard for the net-flex is the cut
12 point at which the minimum ability is determined
13 to require safe and effective practice nursing at
14 the entry level.

15 And I wondered how does that assist
16 excellence? It sounds like it's kind of dumbing
17 down.

18 T. BUCHHOLZ: That's an interesting
19 perspective and I appreciate the question. Net-
20 flex was the standard licensure examination
21 throughout the United States and territories, and
22 in several countries right now as well.

1 And the question that you ask is a
2 question that National Council State Board of
3 Nursing actually asked years ago and have been
4 doing rigorous research to look at that
5 particular exam.

6 That's the standard, that's one of the
7 main quality indicators but should it be the only
8 quality indicator?

9 With regards to what we review, net-
10 flex pass rates certainly have to be part of that
11 because our law, our rules require a minimum pass
12 rate of 80 percent for first-time testers in
13 North Dakota.

14 And most standards do have a minimum
15 standard for passing somewhere between 70 and 80
16 percent.

17 With regards to does that prove
18 excellence or does that provide a path to
19 excellence, it provides a path that has been
20 deemed minimum requirement for entry into
21 practice.

22 So, I understand your question when we

1 say minimum standard but the net-flex exam is an
2 incredibly rigorous exam as a licensure
3 examination.

4 And the things that they have been
5 able to identify that will help to further
6 strengthen the rigor of that exam include some
7 interactive pieces with that exam.

8 And they currently have the research
9 that's called the Next-Gen Project, that research
10 is ongoing and their hope is that they will be
11 able to implement in 2024.

12 And so, certainly, that's a question
13 that has been asked certainly in the nursing
14 community because while it's required to be able
15 to be licensed as a nurse in any state, some
16 territories, some countries, it seems as a
17 standalone not quite enough.

18 And just to tag onto that as far as
19 looking at excellence in a program or the quality
20 of a program, while that is one of the components
21 absolutely we have to look at, our laws and rules
22 require it, that is not the only outcome that we

1 look at to determine whether or not a program is
2 meeting that standard of educational excellence.

3 K. ALIOTO: Certainly, if there's any
4 category of human being that's close to being an
5 angel, it's nurses and particularly in terms of
6 the health of not only North Dakota but all the
7 rest of us.

8 And in regard to that, you have a
9 strategic plan which is boilerplate strategic
10 plan, but how about your strategic plan in
11 relationship to COVID-19 and in terms of training
12 people to work with COVID-19 and also with the
13 fentanyl opiate crisis?

14 T. BUCHHOLZ: And you're speaking to
15 the nursing community, correct, not within the
16 Board?

17 K. ALIOTO: The leadership, you're a
18 leader of the nursing community.

19 T. BUCHHOLZ: Absolutely, thank you
20 for your comment about nurses, of course that is
21 exactly how I feel as well but we appreciate
22 that. It has been a very difficult two years for

1 everyone.

2 As you all know, nurses, doctors,
3 behavioral health providers, anyone in the
4 healthcare community has been on the front lines
5 and it has been very, very wearing on everyone.

6 We have definitely seen some struggles
7 with resilience because you can only do what you
8 can do and sometimes it has been too much for
9 many nurse.

10 This is a terrible statistic to have
11 to share with you but over the course of a 6-
12 month period of time, we had an increase at the
13 Board of Nursing, and this isn't nursing
14 education, but we had an increase by 600 percent
15 within a 6-month period of time.

16 600 percent within 6 months of
17 discipline being reported to the Board. And part
18 of that, as you noted, is exactly that crisis,
19 both with opioids but with substances in general.

20 And we all know that when we start to
21 chip away at ourselves and we're giving too much,
22 many times individuals seek other ways to try to

1 provide some comfort and some stability.

2 And so nurses are not immune to that,
3 doctors are not immune to that, any healthcare
4 provider. The other thing that we've seen and we
5 know is there's an increased rate of suicide.

6 So, we at the Board, as far as
7 strategic planning, are very concerned. We did
8 implement a resilience reach-out plan that we're
9 utilizing.

10 Right now it's just in the baby stages
11 where we're providing as much information as we
12 can, trying to connect individuals with
13 behavioral health providers.

14 The other thing that we've done is
15 we've noted that these nurses who are struggling
16 and who are being reported to the Board we need a
17 way to be able to assist them better.

18 So, North Dakota does not currently
19 have a workplace impairment program, however, we
20 are in the beginning stages of creating that.

21 We do have a Subcommittee that was
22 formed by the Board to begin working on that and

1 framing that, and we've been collaborating with
2 our Board of Medicine partners as well and Board
3 of Pharmacy partners as well in North Dakota for
4 that initiative.

5 So, looking forward strategically,
6 even in response to COVID-19 or any crisis with
7 regards to the nursing education in the state of
8 North Dakota and the licensure of nurses in the
9 state of North Dakota.

10 We definitely have had to do some
11 pivoting and some flexing with regards to nursing
12 education. Some of the learning had to go to
13 online for a time but nursing education requires
14 on site, in-person practice experiences.

15 And so that somewhat got shifted, that
16 component got shifted but it did not ever leave
17 the nursing education.

18 And with regards to the pandemic,
19 we've tried to respond with different rules and
20 regulations and working with the Governor's
21 Office in other states to be able to make
22 licensure a more seamless process to ensure we

1 have enough nurses in the state.

2 K. ALIOTO: One of the problems that
3 we're having in San Francisco is with instructors
4 because individuals can earn more and work less
5 as part-time nurses than as instructors at some
6 of our institutions.

7 How are you dealing with that kind of
8 problem or do you have that problem in North
9 Dakota?

10 T. BUCHHOLZ: We do, we're much
11 smaller than California but we absolutely have
12 that same problem.

13 One thing that our legislators were
14 very forward-minded in is that they created a set
15 of rules that allowed for a baccalaureate-
16 prepared nurse to be able to work as a faculty
17 member if they were enrolled in a graduate
18 nursing program and making forward progress.

19 There are strict criteria associated
20 with that with regards to how long you have and
21 having to provide monitoring updates to the
22 Board.

1 But what we find is many programs end
2 up growing their own community of nurses
3 identified as being an excellent precept working
4 with students, encouraged to go to graduate
5 school and then end up being faculty for those
6 programs.

7 That said, that particular component
8 of the rules is utilized a lot and by all
9 programs. And so we do know there's a shortage.

10 We also know there's pressure for
11 nurses to work in the practice setting because it
12 is more feasible economically.

13 As far as the time, what many nurses
14 find is that the commitment, although it might be
15 only for a nine or ten-month period of time, it's
16 incredibly intense as a nursing professor versus
17 in a practice setting.

18 But there are certainly different
19 environments and more lucrative in the practice
20 setting. What we find is that our graduate
21 programs have done a very good job of
22 compensating nursing faculty and being mindful of

1 regular raises to their pay.

2 We always make a comment about that
3 and have discussions about that, that faculty are
4 being paid fairly because we do need them
5 retained and we need quality nursing educators to
6 continue in our programs and in our state.

7 K. ALIOTO: And then could you tell us
8 was it Turtle Mountain or Sitting Bull that
9 closed? Can that be on the record or not?

10 T. BUCHHOLZ: Absolutely. And I
11 appreciate that question because I think it's
12 important that the more people perhaps know, the
13 better, and not just about Turtle Mountain.

14 What we find is that the resources in
15 Native American post-secondary institutions often
16 are lacking, not for lack of trying to on the
17 part of the individuals who are working in those
18 institutions.

19 But there has to be recognition of the
20 value of a nursing program and often times, what
21 we hear is while it's important that these
22 smaller communities within reservation country

1 have a nursing program to serve the community, it
2 also is very costly to have a nursing program.

3 And often, the individuals that are
4 interested in attending a program that's smaller,
5 as was the case with Turtle Mountain, are very
6 limited.

7 For example, you brought up Sitting
8 Bull and the most students that Sitting Bull in
9 one of our reservations currently could graduate
10 would be five nurse graduates each year.

11 In the case of Turtle Mountain,
12 unfortunately they struggle because of the
13 ruralness, again very consistent in North Dakota
14 because of the rural nature of the state.

15 But because of the ruralness, because
16 of the limited resources to be able to compensate
17 faculty and the nursing administrator, they just
18 could not acquire the necessary faculty to be
19 able to offer the program.

20 Unfortunately, when we were on site,
21 we learned towards the final stages of the
22 program before it closed, we learned that the

1 students were actually taking on the teaching of
2 one another because there wasn't faculty or a
3 nursing administrator available to them often
4 times.

5 Those faculty and nurse administrator
6 were being pulled in another direction to assist.
7 And so net-flex pass rates, which you mentioned,
8 suffered, they were incredibly low and the last
9 thing that anyone wants is that someone would go
10 to school to be a nurse, never be able to pass a
11 licensure examination, and therefore, never be
12 able to work as a nurse.

13 And so that's really the duty in
14 particular I feel as a surveyor or we feel as
15 surveyors when we go out.

16 K. ALIOTO: And finally, do you
17 oversee Rasmussen?

18 T. BUCHHOLZ: We have one BSM
19 baccalaureate program that prepares for the
20 registered nurse level of licensure in North
21 Dakota.

22 K. ALIOTO: At Rasmussen?

1 T. BUCHHOLZ: Right, Rasmussen has one
2 location in Fargo, North Dakota, and it's a
3 baccalaureate program.

4 K. ALIOTO: I was curious about that
5 because our accrediting score card zeroes in on
6 Rasmussen having very large student debt flows
7 and I wondered if that applied to the nursing
8 program as well.

9 T. BUCHHOLZ: I was not aware of that
10 and that's very interesting information. We have
11 had discussions when we have been on site with
12 their leadership with regards to being a private
13 institution.

14 And to your point, they're actually
15 the only private for-profit institution that we
16 have in our state. They were the first that was
17 different, something very different from our
18 public state-based or tribal universities and
19 colleges.

20 We did have conversation with them
21 about tuition and the affordability of tuition
22 and that was ongoing actually throughout the

1 initial approval and then up to the full
2 approval.

3 K. ALIOTO: Not many students are in
4 that program?

5 T. BUCHHOLZ: There have not been very
6 many that have graduated. They needed to have a
7 net-flex pass rate, first-time testers, before
8 they could be granted full approval.

9 So, they've just been fully approved
10 for going on the second year and I want to say
11 currently, the program has graduated a total of -
12 - don't quote me, I can look the number up, but I
13 want to say maybe 12 students since they began in
14 North Dakota.

15 K. ALIOTO: Thank you again for your
16 service for us.

17 G.A. SMITH: Art, you're muted.

18 CHAIR KEISER: This is annoying, I'm
19 sorry I did that. Thank you, Dr. Buchholz, are
20 there any questions from any other members of the
21 Committee? Seeing none, thank you very much, Dr.
22 Buchholz.

1 I'd like to call Mr. L.G. Corder back
2 to the screen. Do you have any comments?

3 L.G. CORDER: No, I just thank the
4 agency for its cooperation in facilitating our
5 observations and for their attention to the
6 petition for renewal of recognition.

7 I have no further comments. Thank
8 you.

9 CHAIR KEISER: members of the primary
10 readers, do you have a motion?

11 D. EUBANKS: I can make a motion. I
12 move to seek to recommend that the senior
13 Department official approve the North Dakota
14 Board of Nursing for renewed recognition for four
15 years.

16 CHAIR KEISER: Is there a second?

17 K. ALIOTO: Second.

18 CHAIR KEISER: Herman, you have your
19 hand raised.

20 H. BOUNDS: It's okay, you guys are
21 voting now so I can cover it later.

22 CHAIR KEISER: I also want to

1 recognize that Claude Pressnell as our Vice Chair
2 has joined us for this particular discussion.

3 Welcome, Claude.

4 VICE CHAIR PRESSNELL: Thank you, Art.

5 CHAIR KEISER: There's been a motion
6 and a second and I will go through the roll call
7 unless there's further discussion. Seeing none,
8 Kathleen, signify yes or no on the motion?

9 K. ALIOTO: Yes.

10 CHAIR KEISER: Roslyn?

11 R. CLARK ARTIS: Yes.

12 CHAIR KEISER: Jennifer is not here.

13 Ronnie?

14 R. BOOTH: Yes.

15 CHAIR KEISER: Wally?

16 W. BOSTON: Yes.

17 CHAIR KEISER: Jill?

18 J. DERBY: Yes.

19 CHAIR KEISER: David?

20 D. EUBANKS: Yes.

21 CHAIR KEISER: Michael Lindsay?

22 M. LINDSAY: Yes.

1 CHAIR KEISER: Molly?

2 M. HALL MARTIN: Yes.

3 CHAIR KEISER: Robert?

4 R. MAYES: Yes.

5 CHAIR KEISER: Mary-Ellen?

6 M. E. PETRISKO: Yes.

7 CHAIR KEISER: Michael Poliakoff?

8 M. POLIAKOFF: Yes.

9 CHAIR KEISER: Claude?

10 VICE CHAIR PRESSNELL: Yes.

11 CHAIR KEISER: Bob Shireman?

12 R. SHIREMAN: Yes.

13 CHAIR KEISER: Steve Van Ausdle?

14 S. VAN AUSDLE: Yes.

15 CHAIR KEISER: Motion carries, thank

16 you very much. Thank you very much, Dr.

17 Buchholz.

18 T. BUCHHOLZ: Thank you, all.

19 CHAIR KEISER: We'll move to the next

20 agency for renewal of recognition. Is there

21 anybody who is recusing from this particular

22 agency?

1 The Council on Chiropractic Education,
2 the primary readers are Ronnie Both and Michael
3 Lindsay.

4 The Department staff is Karmon Sims
5 Coates. Would the primary readers like to do an
6 introduction?

7 R. BOOTH: I will. Forgive me if I
8 start coughing, I'm on the positive side of
9 COVID-19 but the cough has not left.

10 So, this has pulled a station for the
11 renewal for the Council on Chiropractic
12 Education.

13 They are petitioning for continued
14 recognition.

15 The Council is recognized as a
16 specialized accreditor, they currently accredit
17 16 chiropractic programs and accreditation by the
18 agency allows its programs to participate in non-
19 Title IV programs offered through the Department
20 of Health and Human Services.

21 They are requesting at this time
22 different from what we usually see but they are

1 currently a program and single purpose
2 institution but they're requesting a change of
3 scope leading just to accredit programs of
4 chiropractic education.

5 So, Karmon has done a good job of
6 getting us all the info we need so I will toss it
7 to Karmon. There she is.

8 K. SIMMS-COATES: Good afternoon, Mr.
9 Chair and members of the Committee.

10 My name is Karmon Sims Coates and I am
11 providing a summary of the review of a petition
12 for renewal of recognition for the Council on
13 Chiropractic Education.

14 The agency's recognition does not
15 include access to Title IV programs. The agency
16 has requested a new scope of recognition, the
17 agency requested to continue to accredit doctors
18 of chiropractic degree programs.

19 However, they'll no longer accredit
20 single-purpose institutions offering doctor of
21 chiropractic programs, which is in its current
22 scope.

1 The Department staff finds the agency
2 substantially compliant and recommends to the
3 senior Department official to renew the agency's
4 recognition for five years and require the agency
5 to submit a monitoring report to demonstrate they
6 consistently adhere to the composition
7 requirements of 602.15 A4, specifically ensuring
8 an educator and practitioner is assigned to all
9 agency appeal panels.

10 The agency must submit a monitoring
11 report if it assembles an appeals panel during
12 their recognition period.

13 The staff recommendation is based on
14 a review of the agency's petition and its
15 supporting documentation as well as observations
16 of a virtual site visit in April 2021 and virtual
17 Board Meeting in July 2021.

18 The Department did not receive any
19 complaints of third-party comments during the
20 recognition period. Representatives of the
21 agency are here today to respond to your
22 questions, thank you.

1 R. BOOTH: agency representative,
2 introduce yourselves?

3 C. LITTLE: Certainly, good afternoon,
4 Chairman Keiser and members of the Committee.
5 I'd like to thank all of you for the opportunity
6 to join me today to discuss the Council on
7 Chiropractic Education's petition for continued
8 recognition.

9 For the record, my name is Craig
10 Little, I represent the CCE as President and
11 Chief Executive Officer of the agency. Our
12 office supports the work of a 16-member council.

13 I'm also joined here today by Dr. Nic
14 Poirier, who has served as Chair of the Council.
15 Dr. Poirier joined the Council in 2014 and
16 assumed the role of Chair in January of 2020, not
17 knowing there was going to be such a landmark
18 change in the operation of accreditation due to
19 the pandemic.

20 Initially trained as a chiropractor,
21 Dr. Poirier also received post-graduate training
22 and board certification in radiology, and

1 ultimately received his doctorate in education
2 from St. John Fisher University.

3 He served multiple roles as a
4 clinician and an educator and currently serves as
5 the Assistant Vice President for Academic Affairs
6 at Northeastern Health Sciences University.

7 Also with me today is Mr. Ray Bennett
8 who serves as CCE's Vice President for
9 accreditation and operations.

10 Mr. Bennett honorably served our
11 nation as a member of the U.S. military and
12 following his retirement from the military he
13 served on the staff of CCE for almost two
14 decades.

15 I'd like to express our appreciation
16 and thanks to Mr. Herman Bounds and members of
17 the accreditation group of the Department of
18 Education.

19 I particularly would like to thank Dr.
20 Karmon Sims Coates, the Department staff member
21 who has reviewed our petition, visited a Council
22 meeting virtually and a site visit virtually,

1 examined our materials, and provided guidance
2 throughout this process.

3 We're extremely grateful for and
4 appreciative of her careful review and her
5 responsiveness to questions in providing
6 clarification.

7 The Council on Chiropractic Education
8 accredits programs that lead to the doctor of
9 chiropractic degree. Presently, there are 18
10 accredited programs at 21 different education
11 sites.

12 Programs are evaluated by the Council
13 which consists of 16 individuals. Of the 16
14 councilors, 9 are program representatives, 4 are
15 private practitioners, and 3 serves as public
16 members.

17 Public members are defined as
18 individuals that are not doctors of chiropractic
19 and these individuals or any member of their
20 family do not have a consultant or contractual
21 relationship with an accredited program or the
22 agency.

1 The Council truly represents an
2 exceptional group of volunteers who share their
3 time, their deep and broad expertise, and their
4 perspective to review programs for compliance
5 with the CCE standards, and establish and review
6 standards, policies, and procedures.

7 The Council is dedicated to autonomy
8 in decision-making and transparency in the
9 development of standards and policies, and
10 promoting best practices in communicating the
11 bases of the reasons in the accreditation
12 decision-making.

13 Those commitments, I would point out
14 to each of you that have had a history with CCE,
15 in noting the relationships that have been
16 challenging in the past as far as constituencies.

17 And as Dr. Keiser mentioned earlier,
18 the approach in other issues, those commitments
19 have really served the agency quite well and has
20 developed a cultural change and shift that has
21 truly helped the agency over the last five to six
22 years.

1 We looking forward to answering any
2 questions that members of the Committee may have
3 regarding information that's submitted in our
4 petition our other areas of our agency's
5 compliance with the Secretary's criteria.

6 Thank you so much for this
7 opportunity. We'd love to hear any questions you
8 may have.

9 CHAIR KEISER: Other questions from
10 the primary readers?

11 R. BOOTH: Yes, Art, I'm going to
12 start off and then Michael will chime in there as
13 he may have questions for Dr. Little. Thanks
14 from the whole team for being here with us today.

15 My primary question or the lead
16 question would have to do with the staff
17 recommendation that you heard and that you're
18 aware of.

19 I'm not sure when you last had an
20 appeals panel on a decision but tell us how you
21 would put one together when that eventuality
22 comes up, and how you would handle training if

1 you have any for that panel.

2 C. LITTLE: Certainly, we actually
3 have revised our policies to specifically note
4 the mandate to include both educator and
5 practitioner members on the appeals panel.

6 By way of history, we've had very few
7 appeals. Over the last decade, I'd estimate
8 we've probably had three appeals.

9 It just so happens that we had two
10 within a very short period of time and the
11 problem that we ran into, I think this probably
12 happens with other agencies, we had practitioner
13 members and at points in time they were...I'm
14 trying to think of a kind word for this...psyched
15 by programs to become employees of programs.

16 So, we were caught in a period of time
17 with not as many true practitioners as we desire.
18 Nevertheless, the appeals panels we populated did
19 have members that have doctors of chiropractic
20 degrees but were serving as educators as well.

21 So, we revised the policy and we added
22 a substantial number of practitioner members so

1 that that would never be a challenge again. And
2 so that's publicly available on our website and
3 we do not see any challenges coming forward.

4 R. BOOTH: Just given the nature of
5 the business and the fact that you do have to
6 have a practitioner, talk to us about your
7 policies regarding conflict of interests?

8 Not just that appeals panel but on any
9 decision-making, how those were enforced, do you
10 have those policies and procedures in place?

11 C. LITTLE: Thank you for the
12 question, we do.

13 We have before every site visit,
14 before every appeals panel, before every
15 decision-making meeting of the Council, we
16 require all personnel at the agency and all
17 volunteers to fill out a conflict of interests
18 form so we can identify any potential or even
19 perceived conflict of interests.

20 So, we've submitted that information
21 as part of our exhibits. It's something that we
22 regularly administrate and hold, the chair

1 enforces that.

2 So, perhaps at this time I'll defer to
3 our chair, Dr. Poirier, on how he participates in
4 that process and how he actually administrates it
5 as chair.

6 J. N. POIRIER: Thank you, Dr. Little,
7 and it's my pleasure to be here.

8 As part of our regular process in our
9 Council meetings, at the beginning of the meeting
10 we will inquire with all of our councilors to
11 make sure they have read the policies with
12 regards to conflict of interests and they have
13 signed all the documents in regard to that.

14 And they attest to all programs they
15 may have a conflict of interests with and with
16 that we identify those councilors who will need
17 to recuse themselves.

18 Now, once the conversations start
19 about deliberations with program representatives,
20 especially with new program appearances, there's
21 going to be a reminder or a question that's asked
22 to the councilors to identify any new or recent

1 conflict of interests that have not been
2 previously identified.

3 And with that process, we're confident
4 that we get the latest information from our
5 councilors in terms of disclosures of conflict of
6 interests.

7 R. BOOTH: As you said, Dr. Little,
8 those are not just declared but they're
9 documented for the record?

10 C. LITTLE: Correct, for everybody
11 member of staff and decision-making body, they
12 are documented for every meeting and we provided
13 examples as part of our documentation.

14 R. BOOTH: How about complaints that
15 may come up? If we live and breathe long enough
16 a complaint will pop up somewhere, it just does.

17 So, have you recently or in your
18 history received complaints from students or
19 staff? And how do you handle those? Do you have
20 particular policies and procedures in place for
21 those, maybe refer to your chair? How do you
22 handle those?

1 C. LITTLE: Certainly. By way of
2 history, during the last recognition problem we
3 probably received probably four or five
4 complaints.

5 Those are administrated through our
6 Policy 64 and I'm going to have Mr. Bennett
7 describe how Policy 64 operates.

8 And then I may just want to give you
9 a recent example on how we've administrated one
10 complaint.

11 R. BENNETT: Thank you for that
12 question. As Dr. Little mentioned, Policy 64 is
13 our process that we've included in with our
14 petition and also in our follow-up report.

15 Policy 64 covers any complaints
16 against CCE, it covers any complaints against our
17 programs, and it covers any complaints against
18 our members or other volunteers that we have.

19 So, whenever we have a complaint that
20 comes in, both myself and Dr. Little goes through
21 Policy 64 where it outlines exactly the steps of
22 what we do with that.

1 In all cases, every one of those,
2 those steps are all taken forward to the Council
3 chair at the very minimum, especially when it's a
4 complaint against CCE, which we have not had.

5 The ones that Dr. Little mentioned
6 were all complaints against programs.

7 So, those will go on and we will look
8 at that, we will bump it up against our policy,
9 we will pass it down to the first of the Council
10 chair and make sure the Council chair is aware of
11 it, that's part of our policy.

12 Then we have time limits in accordance
13 with the criteria. We follow everything that was
14 in there in our policy.

15 Then it goes from there, sometimes we
16 need to get other information because we have
17 certain criteria in the complaints that the
18 Complainant needs to follow, we need to ask them
19 some questions.

20 We get all that information from the
21 Complainant and in the cases we've had we forward
22 those onto the program and have the program give

1 a response.

2 In every case, if we're moving any
3 complaint forward at all, the person who the
4 complaint is against always has the opportunity
5 to provide their side of the story.

6 Documentation, all that information
7 comes back and it goes to the president and the
8 Council chair and ultimately to the Council.

9 In between that is the Council
10 Executive Committee so the Council Executive
11 Committee will review it during that process.

12 But it goes to the Council and they
13 make a decision on the complaint, whether it
14 needs to be moved forward, whether there's any
15 action on it, and then we notify the program and
16 the Complainant with the steps that were taken
17 and/or not taken, whatever action was done.

18 It's very well outlined in Policy 64
19 and not only is that available in our
20 publications document on our website but we also
21 have it available as a standalone where when you
22 go through our website and you go through our

1 tabs, you can click on an item that says
2 complaints.

3 And then it has the whole process and
4 policy within it.

5 R. BOOTH: Dr. Little, you said you
6 might have an example?

7 C. LITTLE: Some examples are
8 complaints that have come forward from faculty
9 regarding a program sometimes on criteria that
10 don't relate.

11 One of them has had to do with
12 licensures, so we worked in concert with the
13 state licensing board to ensure all individuals
14 were licensed and certified in order to be
15 certain parts of the faculty.

16 We've had a few student complaints on
17 issues that don't necessarily arise to what maybe
18 you would expect as a member of NACIQI.

19 Sometimes it's a complaint that
20 they're in a clinical environment and have been
21 asked to do some front office duties that maybe a
22 student considers not as meaningful as what a

1 doctor would typically do, but it's part of the
2 experience that program does.

3 So, not any complaints that have
4 really risen to an area where you really worry
5 about integrity or financial mismanagement or
6 anything that I think maybe you or I, our ears
7 would perk up for.

8 R. BOOTH: At another larger level, my
9 questions after this are very specific but this
10 one, I remember the first time I went on a
11 consultation visit and I didn't have a clue what
12 I was doing.

13 So, I faked it until I could make it,
14 I kept my mouth shut and watched other people and
15 learned the hard way.

16 It's not necessarily the best way to
17 learn so talk to me about how you put site visit
18 teams in terms of the training in particular,
19 their expertise and their training, and how you
20 put those together.

21 C. LITTLE: Thank you for the
22 question. This is an area that we are very proud

1 of.

2 We spend approximately, as I am
3 accountable to budgets, somewhere in the
4 neighborhood of \$100,000 on average per year
5 training our site team.

6 Typically, we bring them together in
7 one place and have breakout sessions according to
8 what area of the standards they're working on.

9 It's been more challenging doing that
10 in the COVID-19 environment but we developed an
11 online learning platform through Moodle that we
12 had a very comprehensive process even during the
13 pandemic, where we had virtual training that
14 lasted for about a month.

15 We did it concurrently with site team
16 members and members of the Council. So,
17 essentially, what we do is to make sure we
18 calibrate our teams.

19 That's extremely important, it's part
20 of fairness in accreditation but we tend to use
21 examples that we've had from using data in the
22 past and blinding us so it's not recognizable,

1 setting up challenges and making sure our teams
2 are calibrated.

3 And that process, it takes a lot of
4 time and a lot of resources but we devote that.
5 So, we train our academy every year, sometimes
6 we'll have breakout sections but we always have
7 the academy together at a minimum every two
8 years.

9 Sometimes it's certain sections but
10 training every year. We also do pre-meetings
11 with site teams to make sure that they're in the
12 habit of reviewing the standards.

13 But it's a very comprehensive process
14 that we've actually won an award for in past
15 years here in the State of Arizona for the way we
16 train our site team members.

17 R. BOOTH: I think that is so
18 important. We often make too many assumptions so
19 people know what is they're trying to do, which
20 is not necessarily the case.

21 R. BENNETT: Can I add one thing to
22 that? We also do other training in the feedback

1 mechanism, as Craig mentioned. We evaluate all
2 of our academy members and evaluators that go
3 out.

4 We have them with a feedback loop that
5 they self-evaluate each governor.

6 We provide all of that information to
7 our academy committees so it's another mode where
8 the academy committee or the Council or the chair
9 or the president can go back and do individual
10 training if need be.

11 We also have a loop, Dr. Poirier
12 started this before he became chair, recognizing
13 that academy members, sometimes there are reports
14 that come into the Council.

15 We have a Council now and have been
16 for the last five years.

17 The Council provides feedback to
18 academy members on each individual report they
19 submit to the Council and we have the Council
20 give feedback in certain areas and we provide
21 that back to the academy members as well as part
22 of our training.

1 So, it's more than just the annual, we
2 do other mechanicals during the year as well.

3 R. BOOTH: Michael, I've got some more
4 but did you have any questions at this time?

5 M. LINDSAY: I wanted to ask about the
6 criteria of dealing with student achievement and
7 I'm wondering if you could just talk to us about
8 what it is you all track as far as student
9 outcomes?

10 How has your work progressed in
11 helping to keep track of things like graduation,
12 student loan default rates? That's been a
13 conversation we've had in a number of different
14 agencies.

15 I wonder if you could give us an
16 overview around outcomes of student achievement?

17 C. LITTLE: I'd be happy to, thank you
18 for the question.

19 We really have a multi-tiered process
20 when it comes to outcomes and they really
21 surround three primary areas, one of those being
22 the completion rate, the second being licensure

1 success rate.

2 And the third really surrounding
3 medical competency outcome achievement. So, with
4 those, we have bright line thresholds. For
5 completion we have -- and all of these were
6 determined for a taskforce that we use regarding
7 student outcomes.

8 And we've just recently gone through
9 that process because we're in the middle of a
10 standards review. So, when it comes to
11 completion rate we have a 70 percent benchmark
12 that is a bright line threshold.

13 Essentially, that was determined by
14 way of a process that looked at 21 other
15 programmatic accreditors. We also did a
16 literature review.

17 We also surveyed the educational
18 programs to found out where their challenges and
19 what their rates are. We track the data by
20 program over the last ten years, look at trends,
21 and look at the analysis.

22 So, that's really where that process

1 comes through. It's looked at at least every two
2 to three years to make sure it's current. That
3 benchmark is essentially within one standard
4 deviation of the meeting, that's where that lies.

5 When it comes to the licensure success
6 rate, there's an 80 percent threshold on
7 licensure success within six months post-
8 graduation. And so what that means is there's a
9 four-part national board examination.

10 Students go through the first three
11 parts of those typically within the educational
12 program. Most will take the Part 4, which is a
13 clinical part their last year or within six
14 months of post-graduation.

15 And that's how we measure success when
16 it comes to licensure success. Completion has
17 actually been climbing a little bit. Licensure
18 success was climbing until it came to the
19 pandemic, then there was difficulty with students
20 being able to sit for a Part 4, which is a face
21 to face evaluation, and we went through those
22 challenges.

1 Still, no program dipped below the
2 threshold but some did still have some
3 challenges. And the last is a medical competency
4 outcome.

5 We have 31 different competency
6 outcomes and we require every program to have
7 evidence that each of their students have
8 verifiable data in passing each medical
9 competency outcome prior to graduation.

10 And really, for an accreditator as far
11 as accountability, because our graduates are
12 going to be treating the public, that's really a
13 bright line standard that we hold every program
14 accountable to.

15 There has to be valid measurements, an
16 authentic tool, to measure each of those 31
17 competencies and the program has to have evidence
18 that each student has that prior to graduation.

19 M. LINDSAY: Since CC was first
20 recognized in the 1970s, do you have a sense of
21 how many programs have crossed these bright lines
22 and have had their recognitions removed?

1 C. LITTLE: I'll give you two examples
2 that are probably within the last recognition
3 period, because I think this speaks to the
4 intersection of assurance and improvement.

5 I'm going to give you the example of
6 programming. We require programs to report these
7 outcome scores with us on a yearly basis. We
8 watched Program A starting to dip down and so
9 even before they were below threshold, we would
10 require a report.

11 Program A, we're noticing that your
12 numbers are going down, hopefully you're noticing
13 your numbers are going down, give us an analysis
14 of these numbers.

15 And so we did this with Program A and
16 Program A took a step back and really thought
17 about this in a manner that what do we need to
18 not only get compliance but how can we improve
19 our program?

20 So, they did a number of things when
21 it came to improving their student services.
22 They increased their admission requirements and I

1 think they expressed some fears about that
2 because when you increase admission requirements,
3 one of the fears is maybe we're not going to have
4 the enrollment pool that we typically have.

5 They actually found they grew their
6 program with these increased admission
7 requirements and they became very successful, not
8 only in completion, more successful in
9 completion, but in their licensure success
10 scores.

11 And I'll talk about Program B, Program
12 B we noted it was below threshold and we put the
13 program on probation. Program B was very upset
14 about that and sued us in federal court.

15 And so we went through the process of
16 defending our process when it came to -- this was
17 just over probably, it wasn't over revocation.
18 We were sued in federal court, we won in federal
19 court, and then it was appealed to the 9th
20 Circuit Court of Appeals.

21 This all happened within the last two
22 years. We were successful in defending our

1 thresholds and our requirements before the 9th
2 Circuit Court of Appeals.

3 So, we feel we've had a very thorough
4 scope examination when it comes to those
5 thresholds and the way we utilize those. We do
6 feel it's important for accountability and we do
7 feel it has a paramount importance when it comes
8 to program improvement.

9 So, again, there have been challenges
10 and how those have played out have been
11 completely different from time to time but that's
12 the way we're moving forward.

13 Ronnie, I'll throw it back to you.

14 R. BOOTH: I appreciate that response.
15 I've seen too much fold when somebody said
16 lawsuit so I've just seen it too many and I was
17 never afraid to be sued, that's just part of the
18 game.

19 C. LITTLE: It's expensive.

20 R. BOOTH: It is but it's a matter of
21 integrity and I think community understanding of
22 program quality, which is an essential piece.

1 So, related to some of those pieces,
2 I'm not sure how you use or if you use or what
3 your awareness is of higher education dashboard,
4 but many of these pieces are out there in that.

5 And especially Dr. Poirier, how would
6 you use those? Do you? And particularly, all of
7 us are concerned about debt load of students and
8 their salaries and are they actually able to have
9 a life once they get into their chosen
10 profession?

11 I'd like to for you to address how you
12 use the dashboard in your work in evaluating what
13 you do. You've given a sum of that but how much
14 you use that.

15 C. LITTLE: Quite frankly, Dr. Booth,
16 it's a challenge. It's a challenge because the
17 data out there is very poor and I'll give you the
18 example, there was the example brought up
19 earlier.

20 I've been online with you folks since
21 the beginning and the example was brought up
22 about the Wall Street Journal. And quite frankly

1 that data is poor and unsupported and it pains me
2 on how things can be published like that without
3 any link to reality.

4 Why it's troubling for this particular
5 discipline is that most graduates go onto become
6 self-employed. Well over 80 percent go to self-
7 employment.

8 Those that are employees in a
9 chiropractic office is far less than 20 percent.

10 It's growing slowly but it's not
11 growing fast enough so we can't get the data of
12 self-employed chiropractors, it's impossible.
13 Programs can't get it, the Department of
14 Education doesn't get it.

15 The Bureau of Labor Statistics doesn't
16 get it so we look at salary.com, we look at a lot
17 of other measurements out there.

18 But if we take a step back and we
19 authentically look at the default rates on the
20 chiropractic discipline, you'll note that it
21 really aligns with a good measure for success.

22 For example, chiropractic programs are

1 sometimes housed in a university environment and
2 sometimes they're exclusive and it's the only
3 thing the university has as a chiropractic
4 program.

5 If you look at those programs that
6 only house chiropractic programs, their default
7 rate is somewhere between 0 percent, not my data,
8 that's the data that's collected, for a program
9 like Texas Chiropractic College at 0 percent to
10 National University of Health Science is
11 overwhelmingly almost all chiropractic at 0.5
12 percent, to Life Chiropractic College West, who
13 we previously accredited institutionally until
14 they went to WOSC is very low. All of our
15 programs are very low.

16 Now, some are housed in universities
17 that have many, many other programs so I don't
18 know that's representative. But we know that's
19 low, we know that students are being successful
20 and paying back their loans.

21 Ultimately, we know there's a high
22 measure of success just looking at some of the

1 salary.com and other instruments that are out
2 there. But we need to take a look and we need to
3 lead in this area because it's not happening.

4 And what we're doing as an agency is
5 we are advocating before jurisdictional licensing
6 authorities to take out the granular restrictive
7 language they have in their statutes that
8 chiropractic programs have to abide by.

9 I'm going to tell you one of the worst
10 states is California.

11 They have butt-in-the-seat hours
12 requirements that programs have to live by, they
13 have granular curricular requirements that
14 programs must include, including things that are
15 outdated in this day and age of medicine.

16 There are terrible problems out there
17 and programs can't evolve or transform themselves
18 or be innovative due to not our requirements, but
19 what's in state licensure laws.

20 So, we need to change that, we need to
21 allow programs to become more innovative and
22 that's the challenge we have in that area.

1 R. BOOTH: I don't have more
2 questions. I'm going to defer to you for next
3 steps.

4 CHAIR KEISER: Questions from the
5 Committee? Bob?

6 (Simultaneous speaking.)

7 R. SHIREMAN: Sorry about that. I'm
8 trying to comply with federal law. I wanted to
9 ask the agency about the federal link that has
10 been determined since the Council is no longer
11 accrediting an institution for Title IV
12 purposes, you don't need a secretarial
13 recognition for the purposes of Title IV.

14 I'm curious, you may have heard my
15 comments earlier where I think it's actually
16 better for programmatic accreditors to stand on
17 their own two feet and not use secretarial
18 recognition as a prestige crutch.

19 So, my preference would be to just let
20 us focus on the institutional accreditors instead
21 of the programmatic accreditors, but it sounds
22 like you are choosing to continue that

1 connection.

2 So, I'm interested in your thoughts on
3 why you want to do that and then also whether you
4 are certain the one that the Department is
5 relying on, the research enhancement grant,
6 actually requires programmatic accreditation.

7 The language is vague in the
8 description of the program.

9 C. LITTLE: Thank you for the
10 question. I can certainly assure you it's
11 continuing to do this is because of the best
12 interest of chiropractic students.

13 As has been mentioned earlier,
14 obviously we've submitted the non-HEA research
15 grants which are important for programs and they
16 are linked to programs.

17 There's also loans for disadvantaged
18 students that are applicable, there's health
19 professional students loans, there's the non-HEA,
20 the research, and the DoD links that again,
21 require the rigor of programming accreditation.

22 Because it is chiropractic education

1 these grants are going for.

2 So, those are important links, we're
3 not doing this for -- I'm sorry, I can't remember
4 the exact word you used but I think it was -- I
5 don't know if it was stature or what that is --

6 R. SHIREMAN: It was prestige that I
7 used.

8 C. LITTLE: If you think we're coming
9 here for prestige, I'm not sure how long you've
10 been around, but we've been humbled before this
11 agency. It's not for prestige. It's an exercise
12 in accountability that we think is appropriate
13 for the rigor of programs that are educating
14 future chiropractic physicians.

15 It's really important, because there's
16 also a link that's not talked about, and that is
17 students that are going forward for licensure in
18 a state that requires them to be educated at a
19 program that is accredited at an agency that's
20 recognized by the Department of Education. So,
21 that's a licensure requirement not for all
22 states. I've talked about the problems that we

1 see with jurisdictional licensing authorities not
2 changing their laws.

3 Now, it's not a problem for NACIQI;
4 it's probably not a problem for the Department of
5 Education, but can you imagine going through a
6 chiropractic program and going through all this
7 and not being able to be licensed in a state
8 because you didn't graduate from a program that's
9 accredited by an agency that's recognized by the
10 Secretary. So, it's multi-factorial. We're here
11 because it's important for students.

12 R. SHIREMAN: So, in terms of people
13 potentially having a real problem, it sounds like
14 it's the state licensing more than the federal
15 link where a student would not be able to get
16 licensed because the state requires chiropractic
17 programmatic accreditation that specifically
18 refers to the Secretary's recognition of the
19 agency, is that right?

20 C. LITTLE: Correct, but again, our
21 students would not have access to loans for
22 disadvantaged students either. That requires

1 programming accreditation.

2 R. SHIREMAN: I have an additional
3 question but I'm fine with going to other people
4 and coming back to me. Either way, we're going
5 to do it.

6 CHAIR KEISER: Your choice.

7 R. SHIREMAN: I will go ahead. Let me
8 ask about obviously you have mentioned
9 controversy around chiropractic generally. I've
10 learned a lot about both podiatry and
11 chiropractic with this NACIQI meeting.

12 And one of the differences that I
13 learned about was that the doctors on the
14 podiatry side, you have doctors of podiatric
15 medicine, it's a DPM, the word medicine is used.

16 And some of the descriptions that I've
17 seen about why some of these use medicine and
18 some of them do not was that both MDs, actually
19 which are medical doctors, and DPMs are --
20 they're what you think of medicine as being.

21 So, they prescribe drugs, they do
22 surgery, and for most of what I saw, all of the

1 Federal Government websites that I saw that
2 referred chiropractic, it was just doctor of
3 chiropractic or chiropractic without the word
4 medicine.

5 You mentioned the importance of
6 integrity and transparency in your standards,
7 that's what the advertising requirements are and
8 I wanted to ask about the use of the word
9 medicine in the programs that your schools, your
10 accredited programs, use.

11 Generally, the programs just say
12 doctor of chiropractic, but in a couple of cases,
13 one of them actually, Keiser University and the
14 other one being National University of Health
15 Sciences, it says doctor of chiropractic
16 medicine.

17 Does your agency have a standard on
18 the use of the term medicine and describing
19 chiropractic programs?

20 C. LITTLE: Thank you for the
21 question. I want to make sure we accredit
22 programs that lead to the doctor of chiropractic

1 degree.

2 A program is able to call itself the
3 name of their program that aligns with the
4 institution mission and the program mission.

5 We have some programs that use the
6 terminology, medicine, as part of their
7 descriptor. It's not something we require, it is
8 something that again, we have programs that don't
9 do that.

10 You folks have experienced some of
11 this. There are different paradigms in the
12 profession, some that align with the differing
13 scopes of practice.

14 As an accreditor, we don't get
15 involved with scope of practice types of
16 nomenclature, we make sure that our standards
17 align with educational quality.

18 So, regardless of it's a program that
19 calls itself -- if they use that generic
20 terminology of medicine in their descriptor, they
21 still have to meet the same standards, as well as
22 a program that does not use that.

1 So, it's really not an issue in
2 accreditation. Again, our standards for
3 educational quality align with that and how that
4 program names its program is really within their
5 self-determination.

6 R. SHIREMAN: Thank you, that's all
7 from me.

8 CHAIR KEISER: I'm sorry, Mary-Ellen,
9 you're next.

10 M. E. PETRISKO: Thank you. I have
11 three questions, I think they're probably pretty
12 short. Thank you for this really very helpful
13 conversation so far.

14 The issue of conflict of interests was
15 raised already and I wanted to come back to that
16 because you do have a relatively limited number
17 of accredited programs.

18 The Academy of Site Team Visitors that
19 you referred to just a few moments ago, when I
20 looked at that, I saw there were a couple of
21 categories that had only one or two members in
22 them, and I was wondering how you handle that if

1 there are conflict of interests regarding
2 staffing of those team members because clearly
3 it's a limited community.

4 So, how do you do that with categories
5 within the academy if there are conflict of
6 interests?

7 C. LITTLE: I'll begin but I'm going
8 to probably hand this off to my Vice President of
9 Accreditation and Operations because he manages
10 the Academy.

11 The first thing I want to ensure is
12 that no matter the number, we certainly have a
13 robust enough academy to fulfil our needs when it
14 comes to ensuring that we eliminate conflicts of
15 interests.

16 We have not had a problem thus far and
17 we will never allow one to occur. Having said
18 that, I want to go ahead and have Mr. Bennett
19 describe the different categories and how they
20 are adequate to fulfil our needs.

21 R. BENNETT: Dr. Petrisko, which
22 category are you referring to?

1 M. E. PETRISKO: I don't have it up
2 there because there's too many papers, but when I
3 looked at the list, there were, say there were
4 maybe five or six, seven categories, of visitors.
5 And there were a couple that had one member or
6 two members.

7 So I was wondering if that person
8 happens to have a conflict, what do you do? Or
9 those people happen to have a conflict?

10 R. BENNETT: Yes, that's why I asked
11 that category. Because we have seven categories
12 on our academy. And they are based on expertise.
13 We have Category 1 that handles program
14 effectiveness, mission, that, administrative. We
15 have Category 2 that handles finance. We have
16 Category 3 that handles faculty, research,
17 scholarships; those type of things.

18 So, each one of our categories are
19 different. But that's part of kind of what we --
20 it's kind of a segue with the training. We
21 manage, myself and my two directors, we manage
22 those numbers in our categories because we've got

1 to make sure we have a category of each and every
2 one of those people, when we go out on a
3 comprehensive visit.

4 We don't go out with three people from
5 Category 1, and one from Category 5. Every time
6 we go on a comprehensive visit, we take one
7 Category 1, one Category 2, one Category 3, 4, 5,
8 and then two from Category 6.

9 Category 7 is for our other residency
10 programs.

11 So, just like with the Council, we
12 keep track of all of the conflicts, of all of our
13 academy members. We have a running list that we
14 keep on everyone. And every time we go to
15 training, we have them update their conflict of
16 interest forms, so we can update that file we
17 have. Every time they go on a visit, they have
18 to update their conflict of interest before we go
19 there.

20 And, also, every time we go on a
21 visit, we have the programs. We send a list of
22 the programs, so they can sign off to make sure

1 there isn't any conflict of interest that we're
2 unaware of, and the program has with a particular
3 member.

4 So, we don't have any problems with
5 the conflict of interest side on our categories,
6 because that's part of my job is making sure we
7 have enough people in each category.

8 It's a real, it's a very seamless
9 activity in our organization now. It has grown
10 through the years. When I came to the agency in
11 2003, we have no training, we had no conflict
12 forms. We had no anything.

13 So, we had to build everything, and
14 build the academy. And the first thing we did
15 with the academy was we built it so that we had
16 equal numbers of people in every category. But
17 we didn't have two, two less so that we are using
18 the same academy members over and over again.

19 And we didn't have too many, whereas
20 you could go three or four years and you'd never
21 even get in a visit.

22 So, I actually formulated a process

1 with the help of the Council and some other
2 volunteers, to make sure we have a consistent
3 number. And that number for us is basically
4 between 48 and 60. And we keep rotating them
5 through.

6 There are people that fall off because
7 they no longer want to serve, or they've retired
8 or whatever. And we have new blood coming in and
9 we train them up. And then we keep track of the
10 entire academy, and we just keep going on a
11 rotational basis.

12 So, yes, there are times when we may
13 have one or, you know, if we're going to a
14 program, we may have one or two people in that
15 category that can't go because of a conflict.
16 And then we may have maybe another one who can't
17 go because they're not available. And then we
18 get down to the others.

19 But yes, we never back down from the
20 categories. We always have someone there, and we
21 always are in three different steps assuring that
22 conflicts are avoided.

1 M. E. PETRISKO: So, whatever I saw --

2 R. BENNETT: And documented.

3 M. E. PETRISKO: -- that looked like
4 there was a category that had one or two people
5 in the whole category, only had one or two
6 people, I must have misread that.

7 R. BENNETT: Well, yes. What you're
8 referring to is the residency program side. We
9 started doing some residencies. We haven't
10 brought those into the scope yet.

11 So while we were going through that
12 process, we had some people who were already
13 trained in the academy, that we also trained for
14 residencies.

15 We had some people that we pulled from
16 residencies, that also could be trained for our
17 programs. And then we had one category that you
18 saw there. That was simply because that person
19 only goes out on residency programs.

20 M. E. PETRISKO: Okay.

21 R. BENNETT: They do not, and have
22 not, been trained in RVCPs, or for our programs.

1 M. E. PETRISKO: Okay, thank you very
2 much.

3 R. BENNETT: Sorry about that.

4 M. E. PETRISKO: That's okay. Thanks
5 for the clarification.

6 My next question is about the bright
7 lines and the benchmarks. And I don't even know
8 if this question is answerable, but I'm going to
9 throw it out there.

10 That was a really good description Dr.
11 Little, that you gave of all the things that you
12 do, and how often you look at all the data that
13 you pull together to set the bright line, set the
14 benchmarks.

15 So, and you talked about completion
16 being 70 percent, and licensure being 80 percent.
17 So, my question when I think about this is
18 always: how does an analysis of aggregate
19 performance and a survey of trends ensure the
20 benchmarks are sufficiently rigorous?

21 I mean, if stuff's sort of going
22 downhill, and those are the data that you're

1 pulling from to set your benchmarks, don't you
2 sometimes say, well, wait a minute, this is going
3 in the wrong direction? We should have something
4 that's higher than this.

5 You talked about setting recruitment
6 standards higher, and it actually improved an
7 institution. Can you talk a little bit more
8 about sufficient rigor and the benchmarks? And
9 then the bright lines, given what you're pooling
10 from, and where programs and trends may be going?

11 C. LITTLE: That's a really good
12 question. I really appreciate it, and it's
13 something that our task force really reflects on.
14 And we looked at it through a difficult time the
15 last two years because of the pandemic. And, you
16 know, the fact is we were looking at completion
17 rates trending up slightly. And we were looking
18 at some fluctuation in licensing success rates.

19 But the fact of the matter is, is that
20 they're really at a level that, that sufficiently
21 protects students interests. And also because of
22 the fact that we have some programs that are

1 really trying to impact their program with
2 diversity, equity, and inclusion processes. And
3 trying to grow programs with a wider pool in that
4 area.

5 So it's something that we're looking
6 at, and we're looking at changes in our standards
7 when it comes to diversity, and how we're going
8 to you know, be able to be inclusive.

9 So, in looking at it, the marks are --
10 or, you know, the question is, is it sufficiently
11 rigorous? And that's the process that we went
12 through, by looking at data, by looking at other
13 programmatic accreditors, particularly if they're
14 aligned in disciplines that are health related;
15 professional degree programs and looking at that.
16 And the overwhelming consensus with the task
17 force is that they are currently sufficiently
18 rigorous.

19 M. E. PETRISKO: So could your task
20 force say, you know what, these data don't look
21 right, we've got to bump this up actually, to --

22 C. LITTLE: Absolutely.

1 M. E. PETRISKO: Yes, okay, all right.

2 C. LITTLE: Absolutely.

3 M. E. PETRISKO: It's not just a
4 reflection of, okay we threw all these data into,
5 into a pool and we pulled out this number, and so
6 that's what it's going to be?

7 C. LITTLE: No. No, no.

8 I want to make sure that I emphasize
9 their process was a very robust process of, of
10 going through literature and trying to, and it,
11 we had public members on this task force. We had
12 members from programs. We had a very robust
13 discussion about it.

14 And the goal, I think, I think every
15 accreditor has the goal that, you know, we want,
16 we want increasing completion. We want to see
17 that trend. We want to see increasing student
18 success.

19 It's the intersection that you folks
20 described earlier, between accountability and
21 improvement.

22 So, we have some education programs

1 that their licensing success is above 95 percent.
2 And, you know what, can we mandate that all of
3 them have that, you know?

4 M. E. PETRISKO: Right, right. I just
5 --

6 C. LITTLE: I don't know --

7 M. E. PETRISKO: -- I just, I'm
8 always concerned if a benchmark or a bright line
9 is too low, people will tend to say that's good
10 enough. But I will leave it at that. You've
11 given me a good answer.

12 The last thing I want to ask is in the
13 last couple of years, how to the fact that your
14 institutions have been, your programs have been
15 affected by the pandemic, how you dealt with, how
16 they have dealt with distance education, and how
17 you've monitored what they're doing with their
18 program offerings. And then how you have handled
19 your onsite reviews.

20 So, if you could just give us a little
21 bit of information about that. I know you didn't
22 have to prepare information towards this focus

1 review, but we'd still like to hear how you
2 handled that.

3 C. LITTLE: It's my pleasure because
4 in my view, this was one of the best examples we
5 have of an agency, of how our volunteers can
6 spring into action.

7 So what we did at the onset of the
8 pandemic was, you know, we had programs that
9 offered no distance education. Zero. We had
10 some that had very robust processes.

11 So we set up a portal on our website
12 to first of all, answer -- programs could send
13 in, programs and/or faculty could send in
14 anonymous questions, and we would answer them.

15 And so this was something that I
16 probably overtaxed my volunteers with, but we
17 took these questions in and if we took a question
18 in, we typically would have an answer up on the
19 website, you know, within 24-48 hours.

20 So, a lot of this was informational.
21 What do we need to do? And of course we had some
22 distance education standards that were -- regs

1 that were changing in that timeline.

2 So, we worked with programs by way of
3 information sharing. And they cooperated really
4 well together in doing a lot of that. Obviously,
5 we had to pivot, as every other accreditor has
6 had to do, and go to a virtual site visit
7 process.

8 What we found is that our standards
9 are, were, are very complimentary to the process.
10 And the minimal changes that we needed to make in
11 policy, were quite easily done, and quite easily
12 administered. We found we had excellent feedback
13 from our programs and our virtual processes. We
14 had, a lot of things are going to stick moving
15 forward.

16 I think it makes it tremendously
17 easier to administrate certain types of visits,
18 maybe where if it's a focused follow-up that's
19 almost exclusively based on data, those make
20 tremendous sense going forward.

21 We would never supplement the process
22 for any type of a comprehensive evaluation, but

1 we enjoyed a really good working relationship
2 between staff and volunteer efforts, to be
3 successful.

4 And we had -- well, actually, I'll
5 maybe turn this over to Dr. Poirier. He served
6 as chair during the entire pandemic, so I'll let
7 him speak on the types of work that the council
8 did.

9 J. N. POIRIER: Thank you, Dr. Little.
10 It was certainly a very interesting time, and I
11 have to say that it was a good collaborative
12 effort between us as counselors, and the
13 executive committee, to be able to work very
14 closely with the staff to be able to support the
15 programs, support the students during that time.
16 It was certainly a very difficult early period
17 during the early months of the pandemic, as you
18 can all imagine.

19 In the field of chiropractic, it's
20 close contact when we talk about interventions
21 and therapeutic procedures, and when the students
22 are learning very practical skills and the

1 application of those skills.

2 So, shifting to an online education
3 format for many of the programs, even in the
4 clinical setting, became quite challenging for
5 many of them to really re-envision what they did
6 in terms of delivering that type of educational
7 experience to the students.

8 So, for us working very closely in
9 terms of communication with the programs, was to
10 make sure that the programs knew what the
11 expectations were still, on the side of the
12 agency.

13 In terms of making sure that the
14 programs knew that they were still responsible to
15 comply with the standards during that period, and
16 that the educational experiences that during the
17 instruction portion, had to be purposeful and
18 meaningful.

19 And continued interactions obviously
20 with students, that were regular and substantive
21 during those type of educational experiences.
22 And that type of discussions and back and forth

1 with the programs was really welcome.

2 Programs had questions also based on
3 their own policies and procedures, that were not
4 a part of the standards of the agency. But that
5 there were their own educational requirements.

6 And, for example, they had a strict
7 qualitative requirements that they had to
8 perform. Students, for example, in one program,
9 would have to perform a certain number of initial
10 patient examinations, and if they were not able
11 to see patients during that time, programs had to
12 shift, pivot, and modify those types of policies.

13 So, our agency was able to provide
14 some flexibility, certainly for those programs to
15 be able to modify those policies, so that the
16 students could continue to receive and
17 participate in this meaningful educational
18 experience. So --

19 M. E. PETRISKO: Was it possible for
20 any student to complete his or her program
21 without really doing hands on clinic?

22 J. N. POIRIER: I'll turn it over to

1 Dr. Little to start with the answer.

2 C. LITTLE: Well, due to the flux of
3 the pandemic, programs had to be innovative, but
4 they did end up getting students typically into
5 some clinical settings. Whether it be, you know,
6 we have a small group come in on Tuesdays,
7 Wednesdays, or Thursdays. They had to be very
8 innovative.

9 But at the end of the day, we never
10 lifted the requirement for demonstrating
11 competency outcomes. We never lifted the
12 requirement for completion. We never lifted the
13 requirement for licensing success.

14 Dr. Poirier is a administrator in a
15 program in New York. They were probably the
16 hardest hit state, and their students were not
17 able to take the final licensing success score
18 for almost a year. Which ultimately affected
19 their scores, but it never dipped below the
20 threshold.

21 But if it would have, I think it would
22 have been a Council discussion on how to manage

1 that. But we knew which students were being
2 impacted.

3 But the fact is, is that programs
4 became more innovative. At the end of the day,
5 they had data to show that their students were
6 competent in each of these outcomes, and they
7 were able to show the other, you know, it was
8 incredible but they were, they pulled off the
9 incredible.

10 M. E. PETRISKO: Great. Thank you
11 very much. That answered my question.

12 CHAIR KEISER: Wally, you're up. And
13 then Kathleen.

14 W. BOSTON: Thanks, Art. So earlier
15 you mentioned The Wall Street Journal article. I
16 don't know if you mentioned it because I
17 mentioned it when we were talking about the
18 podiatry.

19 But I researched that pretty
20 extensively when it came out this summer, because
21 the score card doesn't report these numbers
22 directly on the score card, they just provide the

1 dataset.

2 And I talked to the Department and I
3 guess I would encourage you since we're looking
4 at our own dashboards, to possibly even send our
5 committee a letter.

6 Because you know, when you have data
7 that's a misrepresentation, institutions can be
8 penalized tremendously for misrepresenting
9 statistics for graduates. I don't know whether
10 accrediting bodies can, other than when they meet
11 with us.

12 But I think your explanation is
13 reasonable. If you have a high percentage of
14 graduates who are self-employed, certainly when I
15 look at these numbers, you know, there are only,
16 let's see, there are only eight institutions of
17 the ones that you accredit, who are listed.

18 Which there are also data
19 classification issues and that some schools
20 report, instead of reporting their doctoral
21 degrees as professional degrees, they report them
22 as doctoral degrees, which means they're in the

1 Ph.D. Category, and they don't show up when you
2 try to do a search for chiropractic and
3 professional.

4 So, I for one believe that there's
5 value to the college score card, but I also
6 believe that there's only value if the data is
7 good.

8 And the data is only going to be good
9 if people look at it, and actually pay attention
10 to it. And send letters in to either the
11 Department or to this committee, if we have a
12 subcommittee to look at dashboards.

13 So, that's really a comment, not a
14 question. But if you have any thoughts about
15 that, I'd be glad to hear them.

16 C. LITTLE: No, thank you. You bring
17 up a very good point and, you know, I think that
18 it was, and again, I'm not here to criticize The
19 Wall Street Journal.

20 But the fact is, is that, you know,
21 there was no, we have a Ph.D. candidate that's on
22 your committee. If you're going to put out and

1 make conclusions that based on data without
2 having any reference to the data, I think that's
3 problematic. I know I would not have received my
4 doctoral degree if I would have tried that.

5 I think that that's problematic and so
6 again, whatever data the Department can share is
7 great. I don't know that we've, we're currently
8 not on the dashboard. So, I don't know that,
9 what we can do in that respect.

10 W. BOSTON: Well, you are in the
11 dataset. So, you can download the dataset from
12 the score card, and you will find schools that
13 issue professional doctorates listed.

14 You will probably find your other
15 schools listed, but they're not in the
16 professional chiropractic category because an
17 institutional data person at that institution
18 submitted it under doctoral, and not under
19 professional.

20 C. LITTLE: Thank you.

21 CHAIR KEISER: Kathleen?

22 K. ALIOTO: Wondering if you could

1 just, excuse --

2 CHAIR KEISER: You muted yourself,
3 Kathleen. There you are.

4 K. ALIOTO: Could you tell me on the
5 Council the percent of people who are women?

6 C. LITTLE: It's interesting because
7 I work for an executive committee that is almost
8 exclusively female. There is one male on the
9 executive committee. Our past chair before Dr.
10 Poirier was Dr. Elizabeth Goulard, who was a
11 public member and served as our chair for over
12 two years. I'd have to look at it, but I believe
13 the majority of our council is made up of women.

14 K. ALIOTO: Thank you.

15 R. BENNETT: Dr. Little, we have eight
16 and eight.

17 C. LITTLE: Okay, thank you.

18 CHAIR KEISER: Any other questions?

19 Thank you very much, Dr. Little, and
20 Dr. Poirier.

21 And I'd like to bring back the staff
22 member to respond.

1 K. SIMMS-COATES: No, I have no
2 comments.

3 CHAIR KEISER: Herman, you have a
4 comment?

5 H. BOUNDS: Thanks. I want to make
6 sure I get it in this time.

7 I just wanted to reiterate one thing
8 I think that Dr. Little might have stated. But
9 it's relating to the federal link for this
10 particular agency.

11 So, when you look at the link, you
12 know, it talks about the link being for colleges
13 and accredited institutions that provide
14 education and training, leading to a health
15 professional degree. And then it lists the
16 specific disciplines.

17 But then at the end of that, it
18 clearly states that the accreditation must be
19 provided by a body that is approved for the
20 purposes of, you know, of that specific
21 discipline by the Secretary of Education. So,
22 that's both.

1 That clearly ties their accreditation,
2 their recognition by the Secretary, in order for
3 an institution to receive these particular grant
4 funds. So, that's why their federal link.

5 And, in this case, it's pretty
6 concrete in this one particular, in this
7 particular issue. And that's why we found them
8 compliant in that area. So, I just wanted to
9 point that out.

10 And really quickly, only other thing
11 I wanted to bring up is the question about the
12 programmatic agencies LG said about their, about
13 them not having to comply with separate
14 independent.

15 You're right. I made a comment about
16 rulemaking but what I meant to say was, it would
17 take the statutory change, and then also
18 rulemaking.

19 I just want to make sure that
20 everybody understood that.

21 Thank you.

22 CHAIR KEISER: Bob? Bob?

1 R. SHIREMAN: Yes, thank you. I
2 wanted to thank Herman for reviewing that federal
3 link question. The words in the paragraph that
4 Herman read are, accreditation must be provided
5 by a body approved for such purposes by the
6 Secretary of Education.

7 And the only other reference in that
8 paragraph to accreditation, is accredited
9 institutions.

10 It is vague because those, just those
11 health disciplines are listed in the paragraph,
12 but those disciplines also include things that
13 have no, no programmatic accreditation, like
14 biomedical engineering, and prosthetics and
15 orthotics, and kinesiology. Things like that.

16 So, it doesn't seem like these such
17 purposes actually refers to the, the list of
18 programs.

19 So, I just, I guess I am interested in
20 to the extent we approve for renewal, this agency
21 with some kind of review of something. I think
22 this, the staff recommendation is for a

1 monitoring report.

2 I feel like this federal link question
3 needs to be double-checked. Because it doesn't
4 seem like it actually requires programmatic
5 accreditation in that whole list.

6 H. BOUNDS: Bob, we have double-
7 checked it with everyone before we made our staff
8 recommendation. Our recommendation is that the
9 federal link meets the requirement.

10 The last sentence there, accredited
11 by, accreditation must be provided by a body
12 approved for such purposes by the Secretary of
13 Education.

14 Doctor of Chiropractic is listed
15 there. I don't think there's any way that we
16 could recommend anything different.

17 You have an idea about what you want
18 to recommend, but there's no way that we could
19 disapprove them based on the language in that
20 grant.

21 R. SHIREMAN: I was asking for a
22 double-check of it. But if you think you've

1 double-checked, then fine.

2 H. BOUNDS: We have.

3 CHAIR KEISER: Thank you. Just before
4 we go to the motion, I do want to announce that
5 Bob brought up K.U., Keiser University's,
6 chiropractic the way we advertised it.

7 And that is the way it is listed in
8 the state of Florida, from the Board of
9 Chiropractic Medicine. So, that's why we have
10 that particular title.

11 I would entertain a motion from the
12 readers?

13 R. BOOTH: Okay. Art, Mr. Chair,
14 given I'm going to in a sense parrot the staff
15 recommendation, because I think it's appropriate,
16 I move that the NACIQI recommend that the senior
17 Department official grant the Commission on
18 Chiropractic Education renewed recognition for
19 five years, and require a monitoring report if an
20 appeals committee is assembled during the
21 recognition period, to demonstrate the agency
22 adheres to panel composition requirements as

1 outlined in 602.15(a)(4).

2 CHAIR KEISER: Is there a second to
3 the motion?

4 M. LINDSAY: I will second it.

5 CHAIR KEISER: And that was?

6 M. LINDSAY: Michael Lindsay.

7 CHAIR KEISER: Michael. Okay, is
8 there any discussion on the motion?

9 Hearing -- are those hands up because
10 you want to make, do you have a question on the
11 motion? Mary Ellen? Bob?

12 Mary Ellen, you do?

13 M. E. PETRISKO: No. I just want to
14 understand.

15 So, if there is a monitoring report,
16 that would be reviewed by staff and be deemed to
17 be sufficient, and then everything is fine. And
18 the five year period of recognition just, the
19 clock keeps going.

20 If there is the monitoring report, if
21 there is no appeals committee, there's no
22 monitoring report.

1 So, it's up to the agency to determine
2 yes, can we have an appeals committee, so now we
3 have to put this report in to say what's going on
4 here.

5 Should it not be found to be
6 sufficient, what happens to the five years,
7 anything?

8 And this is all, you know, if, if, if.
9 But it's not clear to me what happens.

10 CHAIR KEISER: Herman?

11 H. BOUNDS: Yes, so here was the
12 situation is that we took the monitoring report
13 approach, because we couldn't find them non-
14 compliant and request a compliance report,
15 because we don't know if they're ever going to
16 have an appeal.

17 So, they may not be able to
18 demonstrate that within one year. So that's why
19 we took the approach of requiring a monitoring
20 report if they do have an appeal within the five
21 year recognition period. Once we would get that
22 information, we would look to see if that appeals

1 panel was of the proper composition.

2 It was just a case of we couldn't
3 apply the compliance report language, because we
4 didn't know if they could ever demonstrate that
5 in 12 months.

6 And then if they couldn't demonstrate
7 it in 12 months, what do we do after that,
8 because we don't know when they're going to have
9 one of those, whether they're going to have an
10 appeal or not.

11 So, this way, they would be
12 substantially compliant throughout the five years
13 until, you know, until they come back for a
14 renewal of recognition.

15 M. E. PETRISKO: So, I don't remember
16 that in other cases there were, because there are
17 a lot of accrediting bodies that don't get
18 appeals.

19 H. BOUNDS: Right.

20 M. E. PETRISKO: So, in every case you
21 would say give us a monitoring report just in
22 case, and not wait for the next review to see if

1 there was an appeal that it was done correctly?

2 H. BOUNDS: Well, the problem, Mary
3 Ellen, is that since they've only had two
4 appeals, that means that they applied their
5 policy correctly half the time. They were 50
6 percent on having a proper composition.

7 We felt as staff we couldn't find them
8 fully compliant here, because they haven't
9 demonstrated that they consistently apply the
10 policy, or apply the requirements.

11 So, the only choice for us was then to
12 require this monitoring report. And then if they
13 do have an appeal, we would be able to review
14 that.

15 This is one that was kind of, it was
16 really stuck in the middle. I think we would
17 have not done due diligence, or if we would have
18 said they were fully compliant. If we just said
19 okay, they're fully compliant, we think they're
20 going to be okay at some point in the future.

21 So, this one we're kind of stuck in
22 the middle with what to do.

1 M. E. PETRISKO: Okay.

2 H. BOUNDS: So, we figured this, that
3 the monitoring report and a substantial
4 compliance, was really the best way to go.

5 M. E. PETRISKO: Okay, thank you.

6 H. BOUNDS: Okay. And, Art, I can't
7 raise my -- I can't lower my hand because of the
8 -- I can't get to the controls. Okay, there we
9 go.

10 Thank you.

11 R. MAYES: You're muted, Art. You're
12 muted.

13 CHAIR KEISER: It keeps going on and
14 off. Are there any other questions or a
15 discussion on the motion?

16 Sensing none, we'll do a roll call.

17 Kathleen?

18 K. ALIOTO: Yes.

19 CHAIR KEISER: Roslyn? She may have
20 gone.

21 G.A. SMITH: Yes, she voted yes right
22 before she left. If that's possible.

1 CHAIR KEISER: We'll see if we need
2 her. Ronnie?

3 R. BOOTH: Yes.

4 CHAIR KEISER: Wally?

5 W. BOSTON: Yes.

6 CHAIR KEISER: Jill?

7 J. DERBY: Yes.

8 CHAIR KEISER: David?

9 D. EUBANKS: Yes.

10 CHAIR KEISER: Michael Lindsay?

11 M. LINDSAY: Yes.

12 CHAIR KEISER: Molly?

13 M. HALL MARTIN: Yes.

14 CHAIR KEISER: Robert?

15 R. MAYES: Yes.

16 CHAIR KEISER: Mary Ellen?

17 M. E. PETRISKO: Yes.

18 CHAIR KEISER: Michael Poliakoff?

19 M. POLIAKOFF: Yes.

20 CHAIR KEISER: Claude?

21 VICE CHAIR PRESSNELL: Yes.

22 CHAIR KEISER: Bob?

1 R. SHIREMAN: Yes.

2 CHAIR KEISER: Steven?

3 S. VAN AUDDLE: Yes.

4 CHAIR KEISER: It looks like the
5 motion carries, and we did have a quorum. Bob --

6 VICE CHAIR PRESSNELL: Claude voted
7 yes.

8 CHAIR KEISER: I see that, oh, yes.

9 VICE CHAIR PRESSNELL: There we go,
10 thank you.

11 CHAIR KEISER: Well, thank you very
12 much. I don't, it's 3:00 o'clock. I think we'll
13 probably just adjourn for today.

14 What do you think members of the
15 committee?

16 K. ALIOTO: After one more?

17 CHAIR KEISER: I don't think we have
18 any more today scheduled.

19 G.A. SMITH: The next group is
20 available in case you wanted to do that. But
21 it's really up to you. They're ready, if you
22 are. But we can also wait until tomorrow.

1 Perhaps you can get a pulse from the committee.

2 CHAIR KEISER: Any kind of discussion
3 or a motion by the committee whether to continue,
4 or to continue tomorrow?

5 S. VAN AUSDLE: It's pretty early out
6 this way. We could do one more.

7 I think if our sources are ready.

8 CHAIR KEISER: I think we can use a --
9 (Simultaneous speaking.)

10 R. BOOTH: Molly and Bob.

11 CHAIR KEISER: You ready, Bob?

12 R. MAYES: Maybe just a quick, short
13 break?

14 R. SHIREMAN: I'm ready. I would be
15 unmasked tomorrow, but I'm fine with doing it
16 with the mask, so either way you want to do it.

17 CHAIR KEISER: Robert asked for like,
18 a 10 minute break. Would that be okay with
19 everyone --

20 (Simultaneous speaking.)

21 CHAIR KEISER: Let's make it 10
22 minutes, and it is 3:05 and we'll continue at

1 3:15, and we will go to the, let's see, the
2 Commission on the English Language Program
3 accreditation.

4 Okay, see you in 10 minutes.

5 (Whereupon, the above-entitled matter
6 went off the record at 3:06 p.m. and resumed at
7 3:15 p.m.)

8 CHAIR KEISER: Welcome back. We are
9 about to do our last agency for the day, and this
10 is a renewal of recognition for the Commission on
11 English Language Program accreditation, or CEA.

12 Our primary readers are Molly Hall
13 Martin, and Bob Shireman. The Department staff
14 is Reva Mallory.

15 Bob, Molly, you're up.

16 R. SHIREMAN: Great, thank you very
17 much, Art. So, I am happy to have the privilege
18 of presenting the petition for continued
19 recognition of the Commission on --

20 CHAIR KEISER: You slowed down, Bob.

21 Is everybody here still all around?

22 Bob, I think your internet has slowed down a

1 little.

2 Patrick, any recommendation?

3 R. SHIREMAN: Am I back?

4 CHAIR KEISER: You're back. There you
5 are.

6 R. SHIREMAN: All right.

7 CHAIR KEISER: You changed boxes.

8 R. SHIREMAN: Oh, that's funny. Well,
9 I had to move boxes, I guess.

10 CHAIR KEISER: What was that old show
11 where they, celebrities in little boxes?

12 R. SHIREMAN: Yes, yes, the one in the
13 middle, yes.

14 All right, so anyway, the CEA does not
15 accredit institutions for the purposes of Title
16 IV programs.

17 So, I definitely found this a little
18 bit confusing because it talks about accrediting
19 institutions and programs, but for kind of the
20 way, for our purposes, it's really a programmatic
21 accreditor from the standpoint of Title IV.

22 So, that is what we will be discussing

1 today. Thank you.

2 CHAIR KEISER: Okay. Could I
3 introduce now the staff?

4 R. SHIREMAN: Yes, please.

5 CHAIR KEISER: Ms. Shackelford, to
6 discuss the agency.

7 R. SHACKELFORD: Hello and good
8 afternoon, Mr. Chairman and members of the
9 Committee. My name is Reha Mallory Shackelford,
10 Esquire, and I am providing a summary of the
11 review of the petition for renewal for the agency
12 the Commission of English Language Program
13 accreditation.

14 The staff recommendation to the senior
15 Department official for this agency, is to renew
16 the agency's recognition for a period of five
17 years.

18 The scope of recognition for this
19 agency is the accreditation of post-secondary,
20 non-degree granting English Language programs and
21 institutions, and the geographic area of
22 accrediting activities is the United States.

1 This recommendation is based on the
2 review of the agency's petition and supporting
3 documentation, in addition to an observed virtual
4 commission meeting on December 2020.

5 Our review of the agency petition,
6 found that the agency is in compliance with the
7 Secretary's criteria for recognition.

8 There were no complaints filed during
9 this review period, and there are no third party
10 commenters on today's agenda.

11 Representatives from the agency are
12 here to respond to your questions.

13 Thank you.

14 CHAIR KEISER: Thank you, and I'm
15 sorry I messed up your first name.

16 R. SHACKELFORD: No worries. It's
17 okay.

18 CHAIR KEISER: Are there any questions
19 for Reha?

20 R. SHIREMAN: Yes, I did have one
21 question for Reha.

22 R. SHACKELFORD: Sure.

1 R. SHIREMAN: The Department of
2 Education reviews this agency because of the
3 Department of Homeland Security's requirements
4 for Secretary recognition.

5 Do we know anything, or do you know
6 anything, about what the DHS's concerns, issues,
7 what it is that they want to make sure is, you
8 know, is the case about, that this accreditor and
9 the institutions themselves?

10 R. SHACKELFORD: Well, I can't speak
11 to concerns about a different department, so, no,
12 I don't have that level of intel. So,
13 unfortunately, no.

14 R. SHIREMAN: Okay, thank you.

15 R. SHACKELFORD: Sure.

16 CHAIR KEISER: Okay, I'll invite the
17 members of the agency to come forward.

18 There you are, Heidi and Ian.

19 I. Collins: Okay, good afternoon,
20 everyone. Thank you for the opportunity to be
21 with you here today, albeit virtually, to discuss
22 the petition for continued recognition for the

1 Commission on English Language Program
2 accreditation, which hereafter I'll refer to as
3 CEA.

4 My name is Ian Collins. I'm the 2022
5 Commission chair. I'm the Academic Assistant
6 Director of the School of Foreign Languages at
7 Yasar University, in Istanbul, Turkey.

8 As you can see, I'm joining you today
9 from CEA's offices in Alexandria, Virginia.

10 CEA is separate and independent, and
11 operates as a 501(c)(3) non-profit corporation,
12 registered in the State of Virginia.

13 We accredit post-secondary intense
14 English programs and language institutions with
15 U.S. and internationally.

16 Currently, CEA accredits 345 programs
17 and institutions, 313 of which are in the U.S.
18 CEA is a hybrid accrediting agency and we
19 accredit 134 programs, and 179 institutions in
20 the U.S.

21 The Commission has 13 members,
22 representing the field of post-secondary

1 intensive English programs, 11 of whom are
2 elected from the field, and two are appointed
3 public members who do not come from the field.

4 The Commission serves as the
5 accreditation decisionmaking body, and non-profit
6 governing board to the agency.

7 I'm joined by CEA's Executive Director
8 Heidi Vellenga, who is the next point.

9 Send it to you, Heidi.

10 H. VELLENGA: Thank you. Good
11 afternoon, chairman Keiser, and other NACIQI
12 members and Department staff.

13 We'd like to thank Dr. Herman Bounds,
14 and the members of the accreditation group,
15 including the staff and analysts assigned to CEA
16 throughout our current recognition period,
17 including Valerie Lefor, Mike Stein, Stephanie
18 McKissic, and our current analyst, Reha Mallory.

19 Since 2019, each has provided valuable
20 feedback throughout each stage in the process, as
21 we navigated the revised recognition procedures.

22 We'd like to especially thank all the

1 staff analysts who took the time to understand
2 CEA's unique status as an accreditor, whose
3 federal link is through the Department of
4 Homeland Security.

5 And to thank Reha Mallory, in
6 particular, for her careful review,
7 responsiveness, and accessibility throughout the
8 petition response period.

9 I would also like to thank the primary
10 readers, and welcome any questions from the
11 members of the Committee at this time.

12 CHAIR KEISER: Thank you. Questions
13 from the primary readers, Bob, Holly, Molly?

14 R. SHIREMAN: Thank you. Let me start
15 with the one that I asked Reha. From your
16 perspective, obviously you must have more
17 interaction with the Department of Homeland
18 Security, than maybe the Department of Education
19 staff do on this issue.

20 What interests, what does the
21 Department of Homeland Security want from your
22 agency in terms of assurances?

1 Are there particular problems that
2 you're on the lookout for that, that led to the
3 law that's called for you to be recognized by the
4 Secretary?

5 H. VELLENGA: Yes. So, as you can see
6 from our petition, the CEA was founded in, began
7 accreditation activities in 1999, and I think we
8 all know what happened in 2001 in September of
9 that year.

10 And we had always planned to be
11 recognized by the Department of Education, as is
12 good practice among accreditors.

13 And throughout some advocacy work
14 through professional organizations, there was a
15 desire to you know, regulate the field.

16 And that accreditation Act, which was
17 signed into law in 2010 and took effect in 2013,
18 was really to ensure that schools are reputable,
19 following their practices, and that their
20 admissions policies allow for admittance of sort
21 of bona fide English language training students.

22 And so CEA existed, but didn't

1 participate in any of the advocacy for that
2 legislation, which really happened independently.

3 And we frequently respond to the part
4 of the Department of Homeland Security, the
5 student exchange and visitor program, SEVP, where
6 we communicate with their school certification
7 unit, to just verify that schools are accredited.
8 But we each perform our independent review.

9 So, we don't do a separate
10 verification of SEVP's compliance, we just look
11 at the school being in compliance with its own
12 policies.

13 R. SHIREMAN: Thank you. I noticed
14 that you probably heard that I have asked
15 questions about public, public members of
16 commissions. And some other agencies just sort
17 of have a negative where a public member is
18 anybody who doesn't have a conflict of interest,
19 like working for a school or whatever.

20 I saw what seemed like a good and
21 appropriate positive definition that you, in your
22 standards, that there are people who have an

1 interest in the welfare of international
2 students.

3 Can you say a little bit about your
4 public members, and the role that you see them
5 taking on?

6 I. Collins: Yes, we have, as I said
7 earlier, there's 13 members of the Commission,
8 two of which are public members. And they're not
9 from the field of English language teaching.
10 They are typically from an education background.

11 And currently our two public members,
12 one is a retiree. He's involved at Oregon
13 University international programs; and, the other
14 public member is an expert in distance learning
15 from the University of Central Missouri.

16 Neither of them are paid. None of the
17 public members are paid. As I said, they are
18 typically from an education background. It's a
19 steep learning curve. English language teaching
20 is sort of on its own a little bit. And so, you
21 know, we feel, you know, to not come from an
22 education background at all, might be quite

1 difficult, I think. But that's it. That's not
2 to exclude anyone.

3 But you know, they're bringing
4 particular experience in international programs
5 and experience in international students, which
6 is obviously beneficial to us, and giving us a
7 more sort of rounded perspective as to what we
8 will do.

9 R. SHIREMAN: Thank you.

10 Let's go to Molly. I know Molly had
11 a question or two.

12 M. HALL MARTIN: Good afternoon. First
13 of all, thank you for being here today.

14 By now we've all heard about the
15 impacts of the pandemic, and the shifts in
16 instructional method giving changing guidance
17 from local, state and federal levels, and the
18 effect on student achievement broadly.

19 International students have the added
20 stress of visa requirements related to
21 instructional modality hanging over their head.

22 Given the nature of visa requirements

1 for in-person learning, and the unique nature of
2 the student body served by the programs you
3 accredit, how have you all navigated the
4 challenges presented by the pandemic, both
5 broadly and specific, to the unique needs of
6 international students?

7 I. Collins: Okay, thanks for that
8 question. Yes, most of our sites, if not all of
9 them, very quickly pivoted to online education,
10 and were forced to do so. And we had to pivot
11 accordingly with them.

12 Actually, we have set up a distance
13 and education task force, which is part of the
14 CEA, and that was established in 2021.

15 And its charge is to look at our
16 policies and procedures, based on the U.S.
17 Department of Education regulations which are
18 effective, which were effect in July 1, 2021.

19 And it's going to recommend any
20 potential changes that we may need to ask
21 regarding eligibility criteria.

22 But that said, we made a number of

1 policy decisions and maybe Heidi can elaborate on
2 those a little bit more than I can, to cope with
3 the situation, but actually it went very well.

4 Whether in the long term, language
5 learning online is going to be an effective way
6 of delivering education for most students, is
7 very debatable. We're kind of waiting for
8 research on that, so that we know whether it is a
9 good way to learn the language.

10 We suspect anecdotally in some of the
11 feedback we've had from the constituent counsel,
12 who will be the accredited sites, that it isn't
13 something that's preferred by most. And, where
14 possible, we have gone back to face-to-face
15 teaching. But the distance education task force,
16 as I said, are looking at that.

17 Is there anything you want to add to
18 the conversation?

19 H. VELLENGA: Yes, thanks, Ian. So,
20 one of the big differences between students who
21 come and study in the United States on English
22 language training visas, and degree seeking

1 students, is the sort of requirement for a full
2 course load.

3 And so for English language training
4 students, a full course load is 18 hours per
5 week, contact hours, face-to-face. Somebody
6 earlier said butt in seats.

7 But you know, it's not permitted for
8 English language training students, to do any
9 portion of their studies online.

10 Unlike undergraduate or graduate
11 students who can take one or two courses on their
12 course load online, in a given semester and
13 maintain their status as a valid international
14 student.

15 So, one of the things that CEA did was
16 to release a statement on Covid-19 in March 2020.
17 And that allowed, sort of extended the
18 flexibilities that were afforded by the
19 Department of Education, but also SEVP and the
20 Department of Homeland Security, to our
21 accredited programs in the institution.

22 And so they were able to quickly adapt

1 instructional modalities with a notification. We
2 considered that not to be a reportable
3 substantive change, but it required notification.

4 So, we set up a separate mail box, and
5 get those message periodically.

6 So, they needed to provide us a
7 notification of any kind of procedural
8 adaptations made as a result of, or in response
9 to, the pandemic.

10 And, you know, in March we sort of
11 thought it will all be over by August. And by
12 August we thought, oh, well, this will be over by
13 the end of 2020.

14 But as time went by, we added as Ian
15 mentioned, additional temporary policy
16 adaptations, which allowed us to do hybrid site
17 visits; allowed for people who were unable to
18 come to attend a work, in-person workshop to
19 extend their term of accreditation on a limited
20 basis.

21 And we began to conduct virtual
22 reviews in August of 2020, which also involved

1 virtual class observations.

2 So, we were able to see, you know, how
3 the students are doing, and how the classroom is
4 functioning as a remote situation.

5 As Ian mentioned, particularly amongst
6 language educators and also students, there's a
7 real preference for face-to-face instruction.
8 And so we don't know exactly how long those
9 temporary flexibilities will last.

10 But for all incoming new students on
11 student visas, they must study at least a portion
12 of their week online in hybrid, hybrid format for
13 language training students.

14 And so we're seeing all kinds of
15 different permutations of that. And planning,
16 depending on where you are in the country, and
17 university shutdowns, and school openings and
18 closings.

19 It's been really variable across the,
20 over 300 programs and institutions. And so they
21 continue to report to us.

22 But I think because SEVP requires

1 students to study the in-person for 18 hours a
2 week, unless that changes, we'll still continue
3 to have a lot of in-person instruction.

4 M. HALL MARTIN: Thank you, back to
5 you, Bob.

6 R. SHIREMAN: All right, I think we're
7 ready for other members of the committee.

8 CHAIR KEISER: Yes, other members of
9 committee, any questions?

10 I can't believe that.

11 Oh, David, go ahead. You got me
12 worried.

13 D. EUBANKS: Sorry to disappoint you,
14 Art.

15 (Laughter.)

16 D. EUBANKS: Well, thank you. I have
17 kind of a low stakes question, and I'm hoping to
18 get a candid answer.

19 You may be aware that in July, the
20 NACIQI subcommittee published a report, that was
21 focused on the changes to the student achievement
22 standard language, some kind of minor changes

1 that have implications nonetheless.

2 And those my understanding is, don't
3 apply in this case because it hasn't kicked in
4 yet. But I want to ask the question as if it
5 did, because I think it's important.

6 In the accreditation standards,
7 there's one on student learning outcomes, which
8 was a topic that the subcommittee considered.
9 It's Curriculum Standard 2, looking at the other
10 screen here. And one of the sample team reports
11 cited the program, because they didn't like the
12 way they had written these student learning
13 outcomes.

14 They didn't like the verb understand.
15 For example, they quote one of them it doesn't
16 work, the student learning outcome they didn't
17 like one of them was, understands simple personal
18 solution messages.

19 And the complaint was that that verb
20 isn't, it isn't a verb that's observable. And
21 here's more in that vein.

22 But I wanted to get your reaction as

1 to whether this, is this the team that just
2 exceeded its mandate and was too enthusiastic, or
3 is it actually kind of standardized that the
4 accreditor would be looking at the verbs used by
5 the student learning outcomes?

6 H. VELLENGA: So, I can tell you that
7 I have a Ph.D. in Applied Linguistics, and most
8 of my commission members are former language
9 teachers. All of the peer reviewers come from a
10 language teaching background.

11 So, grammar is often at the heart of
12 many decisions that are made by our agency, and I
13 think that's just a feature of the field we
14 represent.

15 In our standards document there's a
16 glossary, and in the glossary we have a
17 definition of student learning outcomes that uses
18 those terms of observabilit and measurability.

19 And so what we encourage review teams
20 to do, is take sort of a broad view of the
21 student learning outcomes in general.

22 And so it's unusual to have a specific

1 example of one student learning outcome being
2 deficient in that manner.

3 But for language learning, we were
4 really looking for you know, some kind of thing
5 that could be measured by an assessment.

6 And so to measure understanding is a
7 very passive sort of skill, and hard to
8 demonstrate. And so that would be one reason
9 that a team could cite that.

10 I'd also like to say that every review
11 team is comprised of a, different individuals
12 that need to decide on a finding that goes before
13 the commission that is used to make a
14 collaborative decision about whether or not the
15 institution, or program, is compliant with the
16 standard.

17 And at each stage, there's an
18 opportunity for the site to respond, and it is
19 afforded due process in that way.

20 D. EUBANKS: Okay, the part of the,
21 what the subcommittee looked at was the new
22 language, which seems to indicate that agencies

1 should be pretty clear about what standards for
2 peer review are.

3 And maybe there's somewhere in the
4 culture of teaching the subject that this is
5 clear understanding, but I looked in the glossary
6 you mentioned and the standards themselves, and I
7 didn't see anything nearly that specific. It's a
8 list of, you know, verbs that are acceptable or
9 not

10 And I hope you will take my point that
11 this is the kind of thing that can get
12 accreditation a bad name. It makes us look like,
13 you know, bureaucrats that are just nitpicking at
14 checking boxes, and stuff like that.

15 And just to push back a little bit,
16 they're not complaining about the lack of direct
17 objectives in this thing.

18 They're complaining about the specific
19 word, and they're saying that the word, the verb
20 understanding can't be observed.

21 Like, you know, in history if we
22 wanted to know does the student understand that

1 the Revolutionary War came before the Civil War.

2 We want to know if they understood
3 that. You're implying that there's no way we can
4 understand that. It's sort of an abstract
5 high/low.

6 And your own standards used the word
7 understand in a very similar kind of context.
8 So, if the learning's not understandable, then
9 some of your standards also aren't observable.

10 I'm going to stop here. I just, I
11 think I made my point that this comes across as
12 kind of silly.

13 And if the point is actually to get at
14 measurement, you know, observability, that's
15 distinct from these sort of superficial language
16 features.

17 It's really more about the quality of
18 the data that's collected. And I think the, you
19 know, any standard handbook of measurement could
20 make that point much better than I could.

21 So, thank you for your time and your
22 patience.

1 CHAIR KEISER: Thank you, David.

2 Any further questions?

3 Seeing -- oh, Kathleen.

4 You're muted, Kathleen.

5 K. ALIOTO: How many students do you
6 serve?

7 H. VELLENGA: So, international
8 student enrollment has dropped precipitously as a
9 result of the pandemic. But we do accredit
10 several large sites overseas, which are not
11 really within the purview of the Department's
12 recognition.

13 But right now, there are close to
14 100,000 students that are international students.

15 But there are several different ways
16 international students are counted, and those
17 numbers aren't quite consistently presented
18 across the various forum.

19 But ESL students, as counted by the
20 Open Doors report, which is produced by the
21 International Institute of Education, has numbers
22 for last academic year that show intensive

1 English students represent about 2 to 4 percent
2 of the total international student population.

3 So, I know that that's not a real
4 answer, but that the numbers are not readily
5 available for our field and level.

6 K. ALIOTO: But if it's 2 to 4
7 percent, so that would be 2 to 4,000 students
8 here?

9 H. VELLENGA: I think it's more than
10 that. I'd have to look it up to be sure.

11 K. ALIOTO: This is why I like to have
12 numbers of students.

13 But the other question is, all of
14 these students are involved in either have a job
15 with, with a company or something, or an academic
16 position to go into?

17 Is that what all of this training is
18 around? Or did I miss, miss?

19 H. VELLENGA: So, all of the students
20 who come on non-immigrant student visas, have to
21 be full-time students. And what they did before
22 in their home countries could vary. They could

1 have just finished high school; they could be
2 sort of young professionals who are looking for
3 expanding their job skills, or job training;
4 seeking to be admitted to U.S. institutions of
5 higher education after some initial language
6 training.

7 But we really have a wide diversity of
8 site types that we accredit. So, there's some
9 sort of, you know, vacation English language
10 training short-term things what people come and
11 surf in the afternoon, and study English in the
12 morning.

13 And other more rigorous academic
14 preparation programs really designed to get
15 students into a particular undergraduate or
16 graduate degree program.

17 I would say the majority of students
18 are interested in pursuing international, you
19 know, higher education in the United States.

20 But there are a certain number who are
21 coming for their own professional or personal
22 fulfilment.

1 K. ALIOTO: But there's not a category
2 of people who are coming, just because they want
3 to come to the United States to live for the rest
4 of their lives?

5 H. VELLENGA: No, that would be a
6 different category of people. So, they would
7 come either on immigrant visas, or through other
8 means. But, typically, you know, the majority of
9 our enrollment is on those full-time F-1 non-
10 immigrant visa students.

11 K. ALIOTO: Do you train any immigrant
12 visa, people who have immigrant visas?

13 H. VELLENGA: So, some of our
14 institutions enroll students, particularly in
15 areas where there is workforce training that
16 involves English as a second language
17 instruction.

18 K. ALIOTO: Uh huh. So, like farm
19 workers, or?

20 H. VELLENGA: Not really. I don't
21 know, I can't think of any schools we accredit
22 that work with migrant communities.

1 But there's lots of sort of permanent
2 residents, or other spouses of H-1B visa holders,
3 H-4 visa holders that study full-time.

4 So, some of those, and then, you know,
5 just like, a lot of the Afghan refugees are
6 beginning to be funded to study in several
7 English language programs.

8 So, there is a certain amount of non-
9 immigrant students that, that do study at various
10 institutions.

11 K. ALIOTO: Thank you.

12 CHAIR KEISER: Any further questions?

13 I bring back Reha to, do you have any
14 comments, Reha?

15 R. SHACKELFORD: No, I don't have any
16 more comments. Thank you.

17 CHAIR KEISER: Okay. Any questions
18 for Reha?

19 Sensing none, do I have a motion from
20 either of the primary readers?

21 R. SHIREMAN: I move to accept the
22 staff recommendation.

1 CHAIR KEISER: Is there a second?

2 J. BLUM: Second.

3 CHAIR KEISER: Moved and seconded. Is
4 there discussion?

5 Boy, this is a different group today.

6 Hearing no discussion, we'll go to a
7 roll call vote.

8 Kathleen? Kathleen?

9 K. ALIOTO: Yes.

10 CHAIR KEISER: Yes, good.

11 Roslyn is not, she's on an airplane?

12 R. CLARK ARTIS: Yes, I'm here.

13 CHAIR KEISER: Oh.

14 R. CLARK ARTIS: I'm back.

15 CHAIR KEISER: Welcome back. That was
16 a short flight.

17 R. CLARK ARTIS: Yes, it was.

18 CHAIR KEISER: Jennifer, she also may
19 have been on a flight, but she's not here.

20 Ronnie?

21 R. BOOTH: Yes.

22 CHAIR KEISER: Wally?

1 W. BOSTON: Yes.
2 CHAIR KEISER: Jill?
3 J. DERBY: Yes.
4 CHAIR KEISER: David?
5 D. EUBANKS: Yes.
6 CHAIR KEISER: Michael Lindsay?
7 M. LINDSAY: Yes.
8 CHAIR KEISER: Molly?
9 M. HALL MARTIN: Yes.
10 CHAIR KEISER: Robert?
11 R. MAYES: Yes.
12 CHAIR KEISER: Mary Ellen?
13 M. E. PETRISKO: Yes.
14 CHAIR KEISER: Michael Poliakoff?
15 M. POLIAKOFF: Yes.
16 CHAIR KEISER: Claude Pressnell?
17 VICE CHAIR PRESSNELL: Yes.
18 CHAIR KEISER: Bob Shireman?
19 R. SHIREMAN: Yes.
20 CHAIR KEISER: Steven Van Ausdle?
21 S. VAN AUSDLE: Yes.
22 CHAIR KEISER: It appears that the

1 motion passes. Wow. I think that's a record for
2 the, for this committee.

3 George, as long as you've been here
4 it's a record, huh? All this --

5 (Simultaneous speaking.)

6 G.A. SMITH: What's the record that
7 you're referring to?

8 CHAIR KEISER: That everybody's
9 agreeing today.

10 G.A. SMITH: Oh. No, no.

11 (Laughter.)

12 G.A. SMITH: I've seen it happen
13 before. Maybe not throughout the entire day.

14 CHAIR KEISER: You guys did a great
15 job today.

16 (Simultaneous speaking.)

17 K. ALIOTO: We have softballs.

18 CHAIR KEISER: We do. Well, they
19 were, staff did a great job getting them prepared
20 for us.

21 So, if no further business today,
22 tomorrow we'll deal with the Commission on

1 Radiological Technology, and then we will have a
2 policy discussion, at which hopefully we'll be
3 able to finish before lunch.

4 K. ALIOTO: Great.

5 CHAIR KEISER: George, anything you
6 want to bring up?

7 G.A. SMITH: No, that's it. Get some
8 good rest and we'll see y'all tomorrow morning
9 then at 10:00.

10 CHAIR KEISER: Thank you all. We'll
11 see you tomorrow at 10:00 o'clock.

12 (Whereupon, the above-entitled matter
13 went off the record at 3:47 p.m.)
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Institutional Quality & Integrity

Before: US DED

Date: 02-23-22

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