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 AUSDLE
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
CONTENTS

Welcome and Introductions. . . . . . . . . . . . . . . 4

Administration Policy Update . . . . . . . . . . . . . . 10

Accreditation Dashboard Discussion . . . . . . . . . . 16

Standard Review Procedures Overview. . . . . . . . . 57

Renewal of Recognition:

American Podiatric Medical Association, Council
on Podiatric Medical Education . . . . . . . . . . . . 58

Renewal of Recognition:

North Dakota Board of Nursing. . . . . . . . . . . . 128

Renewal of Recognition:

The Council on Chiropractic Education. . . . . . . 163
G.A. SMITH: Good morning, and welcome, everyone. This is a meeting of the National Advisory Committee on Institutional Quality and Integrity, also known as NACIQI. My name is George Alan Smith and I'm the Executive Director and Designated Federal Official of NACIQI.

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

Section 101(c) and 47C-4 of the HEA and Section 8016 of the Public Health Service Act, 42 U.S.C. Section 2966, require the Secretary to publish a list of state approval agencies, nationally recognized accrediting agencies, and state approval and accrediting agencies for programs of nurse education that the
Secretary determines to be reliable authorities as to the quality of education provided by the institutions and programs they accredit.

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

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

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

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

Art?

CHAIR KEISER: Thank you, George.

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

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

You have to take yourself off mute.

You went back on, Kathleen.


CHAIR KEISER: Roslyn?
R. CLARK ARTIS: Roslyn Clark Artis, president of Benedict College in Columbia, South Carolina.

CHAIR KEISER: Jennifer in Argentina?

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

CHAIR KEISER: Ronnie?

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

CHAIR KEISER: Wally?

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

CHAIR KEISER: Jill?

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

CHAIR KEISER: David?

D. EUBANKS: Good morning, everyone.
I'm David Eubanks at Furman University where I
direct institutional research.

CHAIR KEISER: Molly?

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

CHAIR KEISER: Michael?

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

CHAIR KEISER: Let me try Michael Lindsay, too.

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

CHAIR KEISER: Robert?

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

CHAIR KEISER: Mary Ellen?

M. E. PETRISKO: Mary Ellen Petrisko,
past president of the WASC Senior College and
University Commission.
CHAIR KEISER: I don't see Claude. Is he here?

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

CHAIR KEISER: Okay. Bob?

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

CHAIR KEISER: And last but least from Washington, Steven?


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

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

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

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

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

He served in his senior role in the U.S. House of Representatives and Senate. Mr. Kvaal taught at the University of Michigan's Ford School of Public Policy and graduated with honors from Stanford University and Harvard Law School.
Please welcome with me James Kraal.

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

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

So all of you play a really important role by advising the Secretary on the role of accreditation and the recognition of accrediting agencies. You have a lot of leverage over these quality issues and your work is really more important than ever because of the moment we're in.
Our country needs now more than ever a concerted effort to promote upward mobility and raise living standards, to provide opportunity across geographic, racial, and economic lines, and to help people understand new perspectives across the divides in our country, and it's hard to see how we can reach those goals without more education and higher education, in particular.

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

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

But we still have a long way to go.

Students that I talk to tell me about new
financial needs, learning gaps, mental health challenges. Many colleges are struggling with constantly changing public health demands, new ways of teaching and learning, and in many cases real financial challenges.

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

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

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

Finally, we need to serve all students well. Too many students, especially low income
students, students of color, and rural students
attend underfunded colleges where they're less
likely to graduate and enter a career.

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

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

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

First, we have to face the facts on
how well students are doing. It's as simple as
that. Colleges need to be using data, accreditors need to be using data, and NACIQI needs to be using data. Some of the most inspiring examples of inclusive college are built around data and evidence.

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

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

NACIQI should also use data in the accrediting agency recognition process to students making an investment of their time and money, many while juggling jobs and childcare.
The outcomes that matter are whether a degree will prepare them for a middle class career, a good salary and full participation in their community.

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

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

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

By pairing NACIQI members' expertise in accreditation with data on how an agency's institutions perform across a range of student success measures, you will be able to better
evaluate how each agency is living up to its commitment to ensure quality at its approved colleges.

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

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

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

The department's Accreditation Group will be closely monitoring agencies that are expanding their scope. We will prioritize academic quality and integrity and ensure that strong standards and approval processes are in
place. We will be paying close attention and I
hope NACIQI will do the same.

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

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

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

            Before I go, I want to say thank you
to the department staff who made this meeting
possible, including George Smith, Monica Freeman,
Herman Bounds and his team in the Accreditation
Group -- Donna Mangold, Soren Lagarde and Angela
Sierra.
I also want to say thank you to all the NACIQI committee members. I know you serve as volunteers and I'm grateful for your hard work.

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

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

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

CHAIR KEISER: Thank you, Mr. Secretary.

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

I'm not sure we're set up for questions so we'll move to the next issue on our agenda, which is to discuss the accreditation
dashboard and have a discussion on how we're going to use it.

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

G.A. SMITH: Yeah, very quickly.

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

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

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

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

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

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

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

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

    CHAIR KEISER: Trying to see who that
is.

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

    PARTICIPANT: It's in the reactions.
It's at the bottom of the reactions thing.
CHAIR KEISER: Okay. So if you have a reaction, you have a comment you want to make, you would raise your hand that way.

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

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

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

Number two, you list the HCM2 in terms of heightened cash monitoring but not HCM1, which I think would be of interest -- would be of interest to me before they get to number two, and also of interest to other people who are looking at this data, and I'm very appreciative to the Under Secretary for focusing on the importance of data.
And then the other thing that is not included is the median debt of non-completers. The document indicates the median debt of completers but how about the 40 percent of people who don't complete and are shackled with debt?

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

CHAIR KEISER: Thank you, Kathleen.

Bob, you are next.

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

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

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

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

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

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

B. FU: It depends on the data element. So, for example, the earnings that is based on Title IV students, graduation is based
on a larger sample of students reported --

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

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

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

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

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

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

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

CHAIR KEISER: Thank you, Jennifer.

David?

D. EUBANKS: Yes. Thanks to the leadership and department staff who make this
It's helpful in one way - the raw data
that lists every institution -- because you can
filter to an accreditor that we're reviewing and
then -- and then sort by different student
achievements to see.

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

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

So if we see an agency that's got high
graduation rates and low student achievement,
that suggests that the graduation rates might be
being manipulated artificially or something. It
raises an interesting question anyway.

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

CHAIR KEISER: Wally?

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

And I also agree with Jennifer's
comment about looking at data from all college students. I think this is a consumer issue, and low cost institutions like community colleges may have students who are able to pay for their education without participating in Title IV and I think we do ourselves and the institutions a disservice when we don't include all the data.

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

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

S. VAN AUSDLE: I sound better that way, Art, I think.

CHAIR KEISER: Well, you look good.

You look good.

S. VAN AUSDLE: Good. I read through these and, Bob, I did find that we do have some of these forms for accrediting associations.
The American Podiatric Medical Association is in here so -- but not all. I mean, there was only two that I could find any institutions or agencies that we're reviewing today.

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

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

And then we have the question, well, what if there's not integrity there? We heard this morning that some students may be better off
not going on to college and spending all that money. That's a serious question for this committee, I think.

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

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

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

So I think kind of focusing on the policies that give us confidence that this is a quality institution is really important. That's
going to take a work session to do that.

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

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

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

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

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

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

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

Jennifer? You're muted.

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

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

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

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

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

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

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

CHAIR KEISER: Jill, and then Michael.
J. DERBY: Well, I want to follow up on -- I think Jennifer's suggestion is very good and how can our staff assist us in using this dashboard most effectively.

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

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

So I want to suggest some sort of follow-up here whether a work session, a committee, that could come forth with recommendations but also thoughts about how the
staff can support us using this dashboard most effectively, given, as Jennifer said, it isn't something that they are in the practice of bringing to their analysis.

CHAIR KEISER: Thank you, Jill.

Michael?

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

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

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

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

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

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

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

CHAIR KEISER: Thank you, Michael.

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

R. BOOTH: Let me, first, say I agree
with Michael. I think the national assessments
would be a good thing.

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

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

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

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

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

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

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

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

So for the department, I really think
some training, a serious focus, saying to our
accrediting agencies, this is -- this is data
that's available and you need to be using it and
we're going to hold you accountable for using it.

CHAIR KEISER: Thank you, Ronnie.

Herman?

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

You're muted.


I just want to remind the committee that, you
know, currently we use about six different data
sources when we conduct our analysis.

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

You know, we also use the -- excuse
me, the HCM2 lists. We get an updated one of those lists from FSA. That's part of our review.

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

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

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

And I use that term quite a bit since that is regulatory language. We want the
accrediting agency to be able to tell us how your standards are sufficiently rigorous if there are dips and dives in other areas.

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

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

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

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

And I'd like -- I had kind of thought that these things would come up in the policy discussion tomorrow, but since we're talking about it in terms of the facts that our fee, the
department is restricted by the regulations. But we also can ask the department to help us out.

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

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

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

Some of the agencies are doing that and it's -- the chiropractic agency did that and it's so much more efficient to know that you're going to look at an audit instead of just having the different numbers there.
And let's see. I'd like to have the audits labeled. So if all of the -- if all of the files could be labeled it would be very helpful.

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

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

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

Thank you.

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

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

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

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

    K. ALIOTO: Nobody has them.

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

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

    So, you know, all I would say is, you
know, if folks read and see that Federal Register notice it definitely offers them the opportunity to make comments. And, you know, of course, we don't have any control. We don't go out and personally contact folks to try and get them to comment in.

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

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

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

H. BOUNDS: All right.

CHAIR KEISER: Okay. Brian?

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

I think the -- one of the design principles that we took in designing the
dashboards is kind of like the 10,000-foot view. So it's -- I think we see it very much as the conversation starter in some of the underlying data files to be -- sort of the more granular observations could be done in those contexts.

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

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

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

But it'd be helpful from our perspective and putting these together to know if
-- like, if we -- if we give ourselves two pages, for example, and we can include things like HCM1, some programmatic data, would that be more helpful? But then you'd have to -- it would actually be 112 pages when you first look at it rather than 56 pages. So let us know what you think of that.

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

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

Bob, you had your hand up.

R. SHIREMAN: It's sort of responding to Brian, but I might as well go ahead. I mean, I like the idea of more data. I think having more available it's then available for us to use and other people to use.
Also, it would be useful to release on it -- to release, again, the specific agencies that are coming up at particular moments. So, for example -- because I think that would help encourage -- help people to think about third party comments they might have about agencies.

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

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

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

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

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

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

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

And then the one other thing I will
say is -- and this might be too bold to suggest -- but I do care about what the accrediting agencies and institutions care about how the dashboard is being utilized as well.

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

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

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

CHAIR KEISER: Okay, thank you, Jennifer. And I appreciate the robust discussion. I'm sure the staff has taken some
notes and -- but if you would like I will appoint a subcommittee because I think it's important and just let George and myself know and we'll figure out the process to get that done. Doesn't need a vote. I think I hear the consensus.

G.A. SMITH: Okay. Art, this is George.
Okay, you hear the consensus for the subcommittee.

CHAIR KEISER: I hear the consensus.

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

CHAIR KEISER: Anybody objects to --

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

CHAIR KEISER: Okay. Well, I don't see any objections. Okay. George, would you like to start the introductions of your team and
then, Herman, would you like to do yours?

H. BOUNDS: Sure. Yeah. So you

already know Monica Freeman and I'm joined today

by OGC Angela Sierra and Soren Lagarde.

CHAIR KEISER: Okay. Herman?

H. BOUNDS: Yeah. Good morning again.

My name is Herman Bounds. Of course, I'm the
director of the Accreditation Group, and I could
start with introductions of Accreditation Group
staff.

The first staff member is Beth

Daggett. Beth, would you introduce yourself, please?

E. DAGGETT: Elizabeth Daggett with

the Accreditation Group.

H. BOUNDS: Reha Mallory?

R. MALLORY: Hello, everyone. Reha

Mallory with the Accreditation Group.

H. BOUNDS: Nicole Harris?

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

N. HARRIS: I'm sorry. I think I was
on mute. Sorry.

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

H. BOUNDS: Stephanie McKissic? Is Stephanie there?

PARTICIPANT: Unmute.

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

Okay, we'll move on to --

S. MCKISSIC: Can you hear me now?

H. BOUNDS: Yeah, we can.

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

H. BOUNDS: Okay. Charity Helton?

Charity, are you there?

CHAIR KEISER: She's muted.

H. BOUNDS: Charity, are you muted?

C. HELTON: Good morning. This is Charity Helton with the Accreditation Group.
H. BOUNDS: All right. Karmon Simms-Coates?

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

H. BOUNDS: Mike Stein?

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

H. BOUNDS: L.G.?


H. BOUNDS: And Paul Florek?

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

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

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

We're about ready to get into the beginning of our review of agencies. I'd like to go over our standard review procedures and just
to make sure we -- so we follow a process and a
procedure in these reviews.

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

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

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

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

The first renewal of recognition is
the American Podiatric Medical Association
Council on Podiatric Medical Education.

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

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

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

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

The American Podiatric Medical Association has been continuously recognized since 1952. It was last recognized for continued recognition in the fall of 2016 during the
Both Department staff and the NACIQI at that time recommended to the senior Department officials renewal of the agency's recommend -- excuse me, recognition for a period of five years.

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

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

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

The agency currently serves as the Title IV gatekeeper and requests at this point is before NACIQI on a request for an additional five
years of recognition, which has been recommended by the NACIQI staff for the American Podiatric Medical Association, and cede to my colleague for questions.

CHAIR KEISER: Thank you Roslyn.

Wally, anything you want to — any comments?

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

CHAIR KEISER: Elizabeth, you're up.

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

CHAIR KEISER: Yes.

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

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

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

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

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

The Department received no complaints regarding this agency during the recognition
period and received no third party comments during this review.

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

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

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

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

There was one institution, Western University, that has had a continuing problem
with its graduation rates meeting that standard
and there was a detailed exhibit -- I believe it
was Exhibit 26 -- that had letters of
correspondence.

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

So I assume that was in the review.

Can you comment on that action that happened at
April '20? Because it is not in any of our
exhibits.

E. DAGGETT: I'd be happy to do so.

I need to pull up a different document to take a
look and see. I would say that the agency
representatives are here and they could
definitely speak to that as well.

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

W. BOSTON: Well, I have a similar
question for them. So, you know, I'm glad to ask them when it's their -- you know, my time to ask them questions I'm willing to do that as well.

So I can defer. Thank you.

CHAIR KEISER: Are you finished, Elizabeth?

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

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

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

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

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

H. STAGLIANO: Yes, we're here.

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

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

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

My name is Dr. Keith Cook and I am the current chair of the CPME and serve as the director of the Podiatry Department in podiatric medical education at University Hospital in Newark, New Jersey.
I would like to take this opportunity to introduce Dr. Eric Stamps, who serves as the current chair of the Council's Accreditation Committee. Dr. Stamps is the dean at the California School of Podiatric Medicine at Samuel Merritt University in Oakland, California.

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

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

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

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

So my question is kind of multi-part and it starts with your response to Criteria 602.20A, enforcement time lines, and you talk about institutions out of compliance must come
into compliance within two years.

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

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

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

But it appears to me, and this is where it gets kind of complicated, that the only
way that this institution came into compliance was you actually changed the graduation standard from being one standard deviation below the average of the -- all the institutions and your reason stated was that it was difficult for the institutions to predict where they were going to be if they had to wait until all the data was submitted.

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

So my first part of the question is, you know, what data did you utilize to make your decision to come into -- to utilize 70 percent instead of the standard that you've been using for many years, which was the average of everybody with an exception allowed as long as it
was -- did not exceed one standard deviation.

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

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

So, you know, I don't have access to all of the data that you do. But as a layman, it certainly appears to me oddly coincidental that as their pass rate for graduation rates did improve somewhat from 68.7 to 72 or 73 percent,
kind of odd that that pass rate for the APMLE dropped significantly from 91 to 73 percent, and I'd like to, you know, hear your assessment of that situation and get some more details. Thank you.

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

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

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

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

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

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

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

It takes a while to see if you're -- when they put in all of these different supports for students to find out exactly what is necessary to ensure that these students are
succeeding so where are those weaker points.

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

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

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

But I will say also that there's a -- they can -- we only measure the first time pass
rate on the APMLE. But the students can take it
subsequent times, and when they take it the
second time then we have a much higher percentage
that are passing.

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

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

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

W. BOSTON: Thank you.

CHAIR KEISER: Roslyn?

R. CLARK ARTIS: Yes?

CHAIR KEISER: Do you have any
questions? If not --

R. CLARK ARTIS: I do not have any

questions.

CHAIR KEISER: Anybody have questions

from the group?

David, you have your hand up. Mary

Ellen, you have your hand up second.

D. EUBANKS: Yes, thank you.

CHAIR KEISER: Then Artis third.

D. EUBANKS: Should I go ahead, Art?

CHAIR KEISER: Yes, go ahead, David.

Please.

D. EUBANKS: Thank you.

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

And it seems to me that the

presentation of that material shows a great deal
of attention and that it seems to work pretty well, and I wanted to call out one part that I thought was particularly good.

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

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

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

I mean, particularly you might address the case of Western. What's the tradeoff in the
admissions recruiting knob, if you will, and the ultimate graduation rate?

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

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

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

So they look at students holistically. I mean, they're going to look at those -- the science GPA as something that is a very huge indicator for them, their overall GPA in their undergraduate studies, and then their MCAT scores.
So when they -- then they also conduct interviews and, you know, have different procedures. Each school is a little bit different.

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

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

So the first few years of their programming they're taking all of their basic science courses. So they're -- we need to know that they're going to be able to succeed and the schools do as well, and then from there the last
two years they go into more of their clinical
education.

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

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

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

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

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

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

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

E. STAMPS: Dr. Stagliano, that's absolutely correct. All the schools look at --
do their longitudinal analysis a little
differently, but they have some method of looking
at how students are doing in each subject area
and adjusting accordingly because the goal, of
course, is to -- is student success, and making
sure that our students pass first time the
American Podiatric Medical Licensing Exam part
one.

    D. EUBANKS: Thank you.

    CHAIR KEISER: I'm sorry. Mary Ellen?

    M. E. PETRISKO: Thank you.

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

    But I'm curious to hear what your
experience has been over the last couple of
years, actually, with the pandemic in two areas.
One, is in distance education. You know, most
institutions have had to rely much more on
distance education than they had previously.
So I'd like to hear what you have to say about your institutions dealing with that, particularly with regard to clinical work.

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

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

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

So we had alerted all of the schools to say, if you need to move your classes to distance education -- remote learning -- in order to protect faculty and protect students, then you
1 need to do that, and so, of course, schools shut
down and these schools engaged in distance
education.

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

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

  So we did that for the first year to
just really keep our finger on the pulse of
what's happening across our nine schools. And
then schools -- as things opened up and
individuals felt safer then students returned to
the classrooms and what they did is they would --
they may have added different sections of labs to
have fewer students in the lab at one time so
they could have six feet of spacing.

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

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

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

They really -- the data were showing
that the students were just as successful in
these courses as they had been when it was in-
person learning.

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

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

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

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

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

During COVID, we had to make adjustments for student success because not every
student had an ideal environment for learning and for test taking.

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

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

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

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

H. STAGLIANO: Sure. Sorry I forgot
that part of your question.

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

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

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

So we conducted that site visit in
December of 2020 and we happened to have a staff
member that lives in New York City and they were
able to go onsite, masking and temperature checks
and COVID tests so everything beforehand.
And so they were able to be present onsite to assess the facilities and all that while the rest of the team, which is -- would be a five-member team, conducted it -- the site visit through Zoom, and we will be doing a follow-up visit with that school sometime in the summer or fall.

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

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

So we have really only had those two experiences. But, I mean, from what we learned, I learned that the virtual site visits went better than I expected.
You know, the first time you do it you think it's -- you know, it's going to be a four-day visit and it's a lot of time. You know, can you get all the same information, you know, over the internet.

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

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

But I hope that answers your question.

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

CHAIR KEISER: The next box is Bob Shireman.

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

The first one is related to the idea
of cutting your ties to us and the federal
government, and I ask this because I've noticed
that some of the most respected accreditors out
there are ones that do not seek to be recognized
by the Secretary of Education -- for example, the
ing engineering accreditor, ABET.

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

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

And second, for programmatic
accreditors, the secretarial recognition can kind
of be a crutch -- a prestige crutch. They're
prestigious because they're secretarially
recognized rather than having to kind of
demonstrate it on their own.
I'm asking this of you because, as you mentioned, you have only nine schools. Eight of those nine are programmatically accredited.

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

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

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

H. STAGLIANO: So for the New York College of Podiatric Medicine, they're in the process of merging with a university, and in
doing that we would lose our ability to service
their Title IV gatekeeper and require a change of
scope with the Department.

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

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

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

We plan to keep that recognition, and
those links. I believe for the health profession
student loans it's about $1.8 million that flow
to the schools for that and for the loans for
disadvantaged students about $75,000.
So and I think it's about six schools that engage or that utilize those Title 7 funds because of the recognition with CPME.

R. SHIREMAN: Thank you.

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

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

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

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

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

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

In the past, he was an employee of APMA. But CPME and APMA -- I mean, even though that's our parent organization it's separate. We maintain that boundary of separate and independent, and so it was determined that he is
able to serve as a public member based on the Secretary's requirements for a public member.

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

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

R. SHIREMAN: Thank you.

The third question is about your recruiting and advertising standards. I was looking for what the standard is that you apply
and that what I found was the requirement that
the institution provide a description of the
college's recruitment policies and procedures
with examples of recruitment materials, but I did
not see what standard is applied to those
materials. Can you -- is there -- is there
something I missed?

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

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

We allow that to be based on how the
-- how the school determines that it will work
best for them, and that's something that we
looked at -- look at when we go to their onsite
visits to see how is it that they're recruiting
students.
Now, overall, there are 697 seats among the nine schools and last year, I believe, about 650 of those seats were filled.

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

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

But we don't specifically say that they have to recruit one way or another. And then the -- I don't know if you'd call it a sister or a cousin organization -- the American Association of Colleges of Podiatric Medicine -- and they work much more closely with recruitment efforts with the schools to determine, you know, maybe ways -- different methods to engage students that may be interested in podiatry.
And Dr. Stamps may be able to speak to more of that as a dean and provide better insight.

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

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

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

R. SHIREMAN: Yeah. Your materials mentioned that you count -- periodically review the publications of accredited institutions for
possible, like, misleading or inaccurate information.

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

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

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

And then if I see anything that is just kind of off or, you don't, maybe it's a typo, maybe it's misleading or something -- I haven't seen anything misleading -- but, you know, maybe it's a typo or something, I'll
contact that dean and, you know, just mention to them, by the way, I noticed on your website you should -- you know, the correct way to do that is this and then they immediately correct it.

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

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

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

Wally, then Jennifer.

W. BOSTON: Thank you, Art.

So another question for the agency,
which is the -- this past summer, the Wall Street Journal created a unique tool looking at new data that the college scorecard made available, although the college scorecard focuses more on undergraduate programs related to graduate programs and the debt to income ratio.

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

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

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

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

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

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

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

K. COOK: Thank you, Dr. Stagliano.

I'd be more than happy to.

As Dr. Stagliano mentioned, following
four years of podiatry school the students then
enter a residency program for three years, the
salaries of which vary throughout the country
based on location, some that are as high as
$70,000 to $80,000 per year.

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

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

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

So there is the ability -- even though
students may graduate with debt, there is the
ability to be able to pay that back.

W. BOSTON: Thank you.

CHAIR KEISER: Good. Jennifer?

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

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

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

And so I guess the question I have is have you thought about having more public members? Because, of course, you have the discretion to have more public members than you
And then I guess I have a question about the grad rate change that Wally referenced. What is your process for making a change to what the threshold grad rate or any outcomes rate is in terms of does that go through the commission for approval? What is that process?

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

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

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

Well, first, they'd go out to the
community of interest and gather data on, you
know, what's working, what's not, with the
standards, and then they work on putting together
draft one, and then that goes to the Council and
they have to approve that and that then goes out
to the community of interest for comment.

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

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

Comments come back and we -- and then
the Council said, okay, we're in pretty good
shape, we're ready to go, and they adopted those
documents in 2019.
And so that was the process that happened to change that graduation standard. And as I mentioned earlier, we just found it to be unfair because schools did not know if they would be in or out of compliance.

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

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

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

J. BLUM: So I do -- I just want to say one thing about the not knowing. That's true
across all agencies of different types that have outcomes metrics.

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

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

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

CHAIR KEISER: Sorry. I was on mute.
Kathleen?

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

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

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

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

K. ALIOTO: Yes.

H. STAGLIANO: Okay. I would say on the -- so CPME doesn't get involved in those types of politics. But they're -- the American
Podiatric Medical Association, which is our parent organization, is always looking for parity with the MDs and DOs, and Dr. Cook might be able to provide more insight into what that may look like in practice.

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

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

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

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

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

There is nothing -- the answer to the
question is no, a current staff member could not
serve as a public member. That, I mean, is not
explicitly spelled out in the regulations. But
staff would be very concerned if we were to see
something like that.

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

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

So it was over 10 years ago when that
happened, and I would dare to say that -- and
then now they've moved on to a different medical
association where they served in different roles.
I would dare to say that that person probably provides some additional guidance because they have that experience, having worked with APMA in the past but then now have also worked with a different medical association to be able to provide some of the added information in a larger public view.

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

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

And as CPME noted, they are a very small organization so they're able to have a very specific one-on-one individual view. And so our -- the review of CPME would definitely be different than a much larger, you know, institutional agency that has a much larger membership.
But we don't have any specific requirements to look at in each area but we do have -- we do expect them to have standards that they look at and then we look at the implementation of those standards.

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

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

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

And then I'm trying to think -- Jennifer -- I don't know what her question is. I think it's going to be related to number of
committee members and diversity of the peer reviewers, but I'm not sure. So I'm going to defer.

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

R. SHIREMAN: Art, can I --

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

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

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

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

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

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

Specific to CPME, they have standards and policies where they do review not just that their, you know, renewal of accreditation reviews and then the specific examples they provided.
They have, you know, the self-study and then the team report, and the team report, clearly, states that they reviewed the admissions and recruitment materials that are provided.

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

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

But each agency is looked at their own
-- under their own regard -- under their own standards with regard to whether or not they have demonstrated that they have -- are assessing institutions or programs in these specific areas.

R. SHIREMAN: Thank you.

CHAIR KEISER: I have a question to Elizabeth. It was interesting on the discussion of the effect of the pandemic upon bright lines. How is the Department looking at those bright lines, especially in light of the pandemic, especially in light of lack of clinical facilities in many of the allied health areas?

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

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

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

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

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

We do have -- you know, we're looking at each agency individually. So it would just depend on the agency when they came forward if they had issues and then they would provide, you
know, information and documentation regarding
any, you know, issues they may have faced with
regard to the pandemic.

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

E. DAGGETT: Oh, I think --

CHAIR KEISER: Go ahead.

E. DAGGETT: Yeah. No, I agree. I'm
sorry, Dr. Keiser. I agree, and I think it also
speaks to, you know, what Dr. Boston and also Dr.
Stagliano talked about the lagging student
achievement standards and how these things -- you
know, we're not going to see it -- you know,
these standards are not -- we're not going to see that today. Those are probably things we're going to see in a couple of years.

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

CHAIR KEISER: Herman?

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

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

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

CHAIR KEISER: I'm muted. Thank goodness my phone went off at the same time.

You're up, Jennifer.

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

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

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

Because, again, I mean, I will say this is another example. I mean, you know, when there's only nine -- when there are only nine
programs and there is a tie.

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

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

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

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

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

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

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

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

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

So then it would -- so then it would not matter at that point. But yes, they were
allowed to attest that there were no changes.
This is the last set of agencies that were
submitted prior to the regulatory changes that
we're able to do that.

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

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

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

So I'm just flagging that for the
record, even though I know that's a better policy
conversation for tomorrow.
CHAIR KEISER: I'm pretty sure that's statutory, right, Herman?

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

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

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

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

R. CLARK ARTIS: This is Roslyn Artis. I move that the NACIQI recommend the senior Department official approve the American Podiatric Medical Association Council on Podiatric Medical Education for renewed recognition for a period of five years.
CHAIR KEISER: Is there a second to the motion? Someone want to second?

W. BOSTON: I second it.

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

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

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

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

PARTICIPANT: A roll call.

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

Kathleen?

K. ALIOTO: Yes.

CHAIR KEISER: Roslyn?

R. CLARK ARTIS: Yes.

CHAIR KEISER: Jennifer?
J. BLUM: Yes.

CHAIR KEISER: Ronnie?

R. BOOTH: Yes.

CHAIR KEISER: Wally?

W. BOSTON: Yes.

CHAIR KEISER: Jill?

J. DERBY: Yes.

CHAIR KEISER: David?

D. EUBANKS: Yes.

CHAIR KEISER: Michael Lindsay?

M. LINDSAY: Yes.

CHAIR KEISER: Molly?

M. HALL MARTIN: Yes.

CHAIR KEISER: Robert?

R. MAYES: Yes.

CHAIR KEISER: Mary Ellen?

Mary Ellen?

M. E. PETRISKO: Yes.

CHAIR KEISER: I'm sorry.

M. E. PETRISKO: It's okay.

CHAIR KEISER: Michael Poliakoff?

M. POLIAKOFF: Yes.
CHAIR KEISER: Bob?

R. SHIREMAN: Yes.

CHAIR KEISER: Steve?

S. VAN AUSDLE: Yes.

CHAIR KEISER: All right. The motion carries.

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

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

CHAIR KEISER: Does that work for everybody?

K. ALIOTO: Yes.

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

K. ALIOTO: Thank you.

CHAIR KEISER: We stand adjourned for an hour. Thank you.
(Whereupon, the above-entitled matter
went off the record at 12:07 p.m. and resumed at
1:06 p.m.)

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

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

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

The Board's published mission is to
assure North Dakota citizens quality nursing care
The Board of Nursing approves graduate, baccalaureate, and associate degree programs to prepare individuals for registered nurse licensure and associate degrees and certificate programs for practical nursing.

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

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

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

The state's recognition for its accreditation of nursing programs does not include access to Title IV HEA programs. The staff recommendation to the senior Department
official is to renew the agency's recognition as a nationally recognized state approval agency for nursing education for a period of four years.

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

The Department did not receive any complaints nor written third-party comments during the review cycle regarding the agency. Therefore, the staff recommendation to the senior Department official is to renew the agency's recognition for a period of four years. A representative from the agency is here today and I am happy to answer any questions you might have. This concludes my report, thank you.

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

D. EUBANKS: Just a clarification, for
information the criteria here for 34FR587, not 602, and so it looks different from the criteria we normally discuss in 602.

L.G., you may want to verify that.

That's my understanding.

L.G. CORDER: That's correct.

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

T. BUCHHOLZ: Can everyone hear me?

CHAIR KEISER: We can.

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

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

The mission of North Dakota Board of Nursing is to assure North Dakota citizens
quality nursing care through the regulation of
standards for nursing education, licensure and
practical.

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

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

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

The NDBON considers the Department of
Education recognition process an important
component of continuous quality improvement which
provides assurance of the rigor and the soundness of the evaluation processes in place for nursing education programs in North Dakota.

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

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

Thank you.

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

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

Thanks to the Department staff and to Dr. Buchholz and your team for putting together a
comprehensive report with lots of very
interesting exhibits.

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

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

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

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

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

     I don't have any confidence in my
ability to do that. So, Dr. Buchholz, I wonder
if you'd comment about what graduation rates
typically are, if that's an appropriate question,
and how the Board navigates issues with
graduation rates.

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

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

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

Just last week I provided an update
with regards to the graduation, nurse graduate,
rates in North Dakota and what we did see was not
just a decrease in graduation rates, but actually
they held steady during the pandemic these past
two years.
But what we did see was somewhat of a decrease in enrollments during that time and so we certainly attribute some of the slight decrease in graduation rates to that.

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

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

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

And that happened several years ago pre-COVID-19, and our programs did an astounding job at doing that with limited resources.
And so really what we saw was that programs decided they were going to do a two a year admission, so admitting in the fall, as typically with the traditional program, and then also admitting in spring.

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

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

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

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

So, that's all great, really
interesting. The standard that explicitly
mentions admission criteria talks about enforcing
ethical standards.

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

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

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

       And there's even a special provision
for non-English speakers who choose standardized
test called the TOEFL, where they have
conditional success rates based on TOEFL scores.
So, students are fully informed and this program is doing quite a bit of analytical work on the front end to understand how the admissions criteria affects students.

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

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

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

In particular, I'll share an experience this past fall. Praise God, we were able to go on site again because some restrictions had been lifted and so we were
actually in the environment.

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

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

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

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

And so we did spend quite a bit of
time looking at that and we find often there's
something like that, we always want to listen to
the students, take their information, and then
ask further questions of whoever has oversight
over some of those policies, whether it be the
marketing, whether it be the chief financial
leadership individual, or president of the
university, however we need to get the
information.

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

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

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

Most of the candidates are highly
qualified and many of these programs have had to
or do, I guess all of them do, have their
particular criteria, their policy in place for
how they go about determining their admissions,
who is going to get into the program.

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

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

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

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

D. EUBANKS: That was very helpful.

The thing that I would wish for that we can't have is the line in the annual report
that says the number of students we wish we could admit and admitted but we didn't have space to admit.

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

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

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

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

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

    There are 3 institutions that offer
graduate-level programs and then we have 7 programs that offer baccalaureate degrees for the registered nurse.

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

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

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

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

T. BUCHHOLZ: Of programs?
K. ALIOTO: Of people, of students. I know you have the different categories.

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

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

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

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

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

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

K. ALIOTO: Thank you.

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

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

T. BUCHHOLZ: That's an interesting
perspective and I appreciate the question. Net-
flex was the standard licensure examination
throughout the United States and territories, and
in several countries right now as well.
And the question that you ask is a question that National Council State Board of Nursing actually asked years ago and have been doing rigorous research to look at that particular exam.

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

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

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

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

So, I understand your question when we
say minimum standard but the net-flex exam is an incredibly rigorous exam as a licensure examination.

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

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

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

And just to tag onto that as far as looking at excellence in a program or the quality of a program, while that is one of the components absolutely we have to look at, our laws and rules require it, that is not the only outcome that we
look at to determine whether or not a program is
meeting that standard of educational excellence.

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

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

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

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

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

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

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

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

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

And we all know that when we start to chip away at ourselves and we're giving too much, many times individuals seek other ways to try to
provide some comfort and some stability.

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

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

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

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

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

We do have a Subcommittee that was formed by the Board to begin working on that and
framing that, and we've been collaborating with our Board of Medicine partners as well and Board of Pharmacy partners as well in North Dakota for that initiative.

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

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

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

And with regards to the pandemic, we've tried to respond with different rules and regulations and working with the Governor's Office in other states to be able to make licensure a more seamless process to ensure we
have enough nurses in the state.

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

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

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

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

    There are strict criteria associated with that with regards to how long you have and having to provide monitoring updates to the Board.
But what we find is many programs end up growing their own community of nurses identified as being an excellent precept working with students, encouraged to go to graduate school and then end up being faculty for those programs.

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

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

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

But there are certainly different environments and more lucrative in the practice setting. What we find is that our graduate programs have done a very good job of compensating nursing faculty and being mindful of
regular raises to their pay.

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

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

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

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

But there has to be recognition of the value of a nursing program and often times, what we hear is while it's important that these smaller communities within reservation country
have a nursing program to serve the community, it
also is very costly to have a nursing program.

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

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

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

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

    Unfortunately, when we were on site,
we learned towards the final stages of the
program before it closed, we learned that the
students were actually taking on the teaching of one another because there wasn't faculty or a nursing administrator available to them often times. Those faculty and nurse administrator were being pulled in another direction to assist. And so net-flex pass rates, which you mentioned, suffered, they were incredibly low and the last thing that anyone wants is that someone would go to school to be a nurse, never be able to pass a licensure examination, and therefore, never be able to work as a nurse.

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

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

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

K. ALIOTO: At Rasmussen?
T. BUCHHOLZ: Right, Rasmussen has one location in Fargo, North Dakota, and it's a baccalaureate program.

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

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

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

We did have conversation with them about tuition and the affordability of tuition and that was ongoing actually throughout the
initial approval and then up to the full approval.

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

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

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

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

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

CHAIR KEISER: This is annoying, I'm sorry I did that. Thank you, Dr. Buchholz, are there any questions from any other members of the Committee? Seeing none, thank you very much, Dr. Buchholz.
I'd like to call Mr. L.G. Corder back to the screen. Do you have any comments?

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

I have no further comments. Thank you.

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

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

CHAIR KEISER: Is there a second?

K. ALIOTO: Second.

CHAIR KEISER: Herman, you have your hand raised.

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

CHAIR KEISER: I also want to
recognize that Claude Pressnell as our Vice Chair has joined us for this particular discussion.

Welcome, Claude.

VICE CHAIR PRESSNELL: Thank you, Art.

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

K. ALIOTO: Yes.

CHAIR KEISER: Roslyn?

R. CLARK ARTIS: Yes.

CHAIR KEISER: Jennifer is not here.

Ronnie?

R. BOOTH: Yes.

CHAIR KEISER: Wally?

W. BOSTON: Yes.

CHAIR KEISER: Jill?

J. DERBY: Yes.

CHAIR KEISER: David?

D. EUBANKS: Yes.

CHAIR KEISER: Michael Lindsay?

M. LINDSAY: Yes.
CHAIR KEISER: Molly?
M. HALL MARTIN: Yes.
CHAIR KEISER: Robert?
R. MAYES: Yes.
CHAIR KEISER: Mary-Ellen?
M. E. PETRISKO: Yes.
CHAIR KEISER: Michael Poliakoff?
M. POLIAKOFF: Yes.
CHAIR KEISER: Claude?
VICE CHAIR PRESSNELL: Yes.
CHAIR KEISER: Bob Shireman?
R. SHIREMAN: Yes.
CHAIR KEISER: Steve Van Ausdle?
S. VAN AUSDLE: Yes.
CHAIR KEISER: Motion carries, thank you very much. Thank you very much, Dr. Buchholz.
T. BUCHHOLZ: Thank you, all.
CHAIR KEISER: We'll move to the next agency for renewal of recognition. Is there anybody who is recusing from this particular agency?
The Council on Chiropractic Education, the primary readers are Ronnie Both and Michael Lindsay.

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

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

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

They are petitioning for continued recognition.

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

They are requesting at this time different from what we usually see but they are
currently a program and single purpose institution but they're requesting a change of scope leading just to accredit programs of chiropractic education.

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

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

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

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

However, they'll no longer accredit single-purpose institutions offering doctor of chiropractic programs, which is in its current scope.
The Department staff finds the agency substantially compliant and recommends to the senior Department official to renew the agency's recognition for five years and require the agency to submit a monitoring report to demonstrate they consistently adhere to the composition requirements of 602.15 A4, specifically ensuring an educator and practitioner is assigned to all agency appeal panels.

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

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

The Department did not receive any complaints of third-party comments during the recognition period. Representatives of the agency are here today to respond to your questions, thank you.
R. BOOTH: agency representative, introduce yourselves?

C. LITTLE: Certainly, good afternoon, Chairman Keiser and members of the Committee.
I'd like to thank all of you for the opportunity to join me today to discuss the Council on Chiropractic Education's petition for continued recognition.

For the record, my name is Craig Little, I represent the CCE as President and Chief Executive Officer of the agency. Our office supports the work of a 16-member council.

I'm also joined here today by Dr. Nic Poirier, who has served as Chair of the Council. Dr. Poirier joined the Council in 2014 and assumed the role of Chair in January of 2020, not knowing there was going to be such a landmark change in the operation of accreditation due to the pandemic.

Initially trained as a chiropractor, Dr. Poirier also received post-graduate training and board certification in radiology, and
ultimately received his doctorate in education from St. John Fisher University.

He served multiple roles as a clinician and an educator and currently serves as the Assistant Vice President for Academic Affairs at Northeastern Health Sciences University.

Also with me today is Mr. Ray Bennett who serves as CCE's Vice President for accreditation and operations.

Mr. Bennett honorably served our nation as a member of the U.S. military and following his retirement from the military he served on the staff of CCE for almost two decades.

I'd like to express our appreciation and thanks to Mr. Herman Bounds and members of the accreditation group of the Department of Education.

I particularly would like to thank Dr. Karmon Sims Coates, the Department staff member who has reviewed our petition, visited a Council meeting virtually and a site visit virtually,
examined our materials, and provided guidance throughout this process.

We're extremely grateful for and appreciative of her careful review and her responsiveness to questions in providing clarification.

The Council on Chiropractic Education accredits programs that lead to the doctor of chiropractic degree. Presently, there are 18 accredited programs at 21 different education sites.

Programs are evaluated by the Council which consists of 16 individuals. Of the 16 councilors, 9 are program representatives, 4 are private practitioners, and 3 serves as public members.

Public members are defined as individuals that are not doctors of chiropractic and these individuals or any member of their family do not have a consultant or contractual relationship with an accredited program or the agency.
The Council truly represents an exceptional group of volunteers who share their time, their deep and broad expertise, and their perspective to review programs for compliance with the CCE standards, and establish and review standards, policies, and procedures.

The Council is dedicated to autonomy in decision-making and transparency in the development of standards and policies, and promoting best practices in communicating the bases of the reasons in the accreditation decision-making.

Those commitments, I would point out to each of you that have had a history with CCE, in noting the relationships that have been challenging in the past as far as constituencies.

And as Dr. Keiser mentioned earlier, the approach in other issues, those commitments have really served the agency quite well and has developed a cultural change and shift that has truly helped the agency over the last five to six years.
We looking forward to answering any questions that members of the Committee may have regarding information that's submitted in our petition our other areas of our agency's compliance with the Secretary's criteria.

Thank you so much for this opportunity. We'd love to hear any questions you may have.

CHAIR KEISER: Other questions from the primary readers?

R. BOOTH: Yes, Art, I'm going to start off and then Michael will chime in there as he may have questions for Dr. Little. Thanks from the whole team for being here with us today.

My primary question or the lead question would have to do with the staff recommendation that you heard and that you're aware of.

I'm not sure when you last had an appeals panel on a decision but tell us how you would put one together when that eventuality comes up, and how you would handle training if
you have any for that panel.

C. LITTLE: Certainly, we actually have revised our policies to specifically note the mandate to include both educator and practitioner members on the appeals panel.

By way of history, we've had very few appeals. Over the last decade, I'd estimate we've probably had three appeals.

It just so happens that we had two within a very short period of time and the problem that we ran into, I think this probably happens with other agencies, we had practitioner members and at points in time they were...I'm trying to think of a kind word for this...psyched by programs to become employees of programs.

So, we were caught in a period of time with not as many true practitioners as we desire. Nevertheless, the appeals panels we populated did have members that have doctors of chiropractic degrees but were serving as educators as well.

So, we revised the policy and we added a substantial number of practitioner members so
that that would never be a challenge again. And so that's publicly available on our website and we do not see any challenges coming forward.

R. BOOTH: Just given the nature of the business and the fact that you do have to have a practitioner, talk to us about your policies regarding conflict of interests?

Not just that appeals panel but on any decision-making, how those were enforced, do you have those policies and procedures in place?

C. LITTLE: Thank you for the question, we do.

We have before every site visit, before every appeals panel, before every decision-making meeting of the Council, we require all personnel at the agency and all volunteers to fill out a conflict of interests form so we can identify any potential or even perceived conflict of interests.

So, we've submitted that information as part of our exhibits. It's something that we regularly administrate and hold, the chair
enforces that.

So, perhaps at this time I'll defer to our chair, Dr. Poirier, on how he participates in that process and how he actually administers it as chair.

J. N. POIRIER: Thank you, Dr. Little, and it's my pleasure to be here.

As part of our regular process in our Council meetings, at the beginning of the meeting we will inquire with all of our councilors to make sure they have read the policies with regards to conflict of interests and they have signed all the documents in regard to that.

And they attest to all programs they may have a conflict of interests with and with that we identify those councilors who will need to recuse themselves.

Now, once the conversations start about deliberations with program representatives, especially with new program appearances, there's going to be a reminder or a question that's asked to the councilors to identify any new or recent
conflict of interests that have not been
previously identified.

And with that process, we're confident
that we get the latest information from our
councilors in terms of disclosures of conflict of
interests.

R. BOOTH: As you said, Dr. Little,
those are not just declared but they're
documented for the record?

C. LITTLE: Correct, for everybody
member of staff and decision-making body, they
are documented for every meeting and we provided
to every meeting and we provided examples as part of our documentation.

R. BOOTH: How about complaints that
may come up? If we live and breathe long enough
a complaint will pop up somewhere, it just does.

So, have you recently or in your
history received complaints from students or
staff? And how do you handle those? Do you have
particular policies and procedures in place for
those, maybe refer to your chair? How do you
handle those?
C. LITTLE: Certainly. By way of history, during the last recognition problem we probably received probably four or five complaints.

Those are administrated through our Policy 64 and I'm going to have Mr. Bennett describe how Policy 64 operates.

And then I may just want to give you a recent example on how we've administrated one complaint.

R. BENNETT: Thank you for that question. As Dr. Little mentioned, Policy 64 is our process that we've included in with our petition and also in our follow-up report.

Policy 64 covers any complaints against CCE, it covers any complaints against our programs, and it covers any complaints against our members or other volunteers that we have.

So, whenever we have a complaint that comes in, both myself and Dr. Little goes through Policy 64 where it outlines exactly the steps of what we do with that.
In all cases, every one of those, those steps are all taken forward to the Council chair at the very minimum, especially when it's a complaint against CCE, which we have not had.

The ones that Dr. Little mentioned were all complaints against programs.

So, those will go on and we will look at that, we will bump it up against our policy, we will pass it down to the first of the Council chair and make sure the Council chair is aware of it, that's part of our policy.

Then we have time limits in accordance with the criteria. We follow everything that was in there in our policy.

Then it goes from there, sometimes we need to get other information because we have certain criteria in the complaints that the Complainant needs to follow, we need to ask them some questions.

We get all that information from the Complainant and in the cases we've had we forward those onto the program and have the program give
a response.

In every case, if we're moving any complaint forward at all, the person who the complaint is against always has the opportunity to provide their side of the story.

Documentation, all that information comes back and it goes to the president and the Council chair and ultimately to the Council.

In between that is the Council Executive Committee so the Council Executive Committee will review it during that process.

But it goes to the Council and they make a decision on the complaint, whether it needs to be moved forward, whether there's any action on it, and then we notify the program and the Complainant with the steps that were taken and/or not taken, whatever action was done.

It's very well outlined in Policy 64 and not only is that available in our publications document on our website but we also have it available as a standalone where when you go through our website and you go through our
tabs, you can click on an item that says
complaints.

And then it has the whole process and
policy within it.

R. BOOTH: Dr. Little, you said you
might have an example?

C. LITTLE: Some examples are
complaints that have come forward from faculty
regarding a program sometimes on criteria that
don't relate.

One of them has had to do with
licensures, so we worked in concert with the
state licensing board to ensure all individuals
were licensed and certified in order to be
certain parts of the faculty.

We've had a few student complaints on
issues that don't necessarily arise to what maybe
you would expect as a member of NACIQI.

Sometimes it's a complaint that
they're in a clinical environment and have been
asked to do some front office duties that maybe a
student considers not as meaningful as what a
doctor would typically do, but it's part of the experience that program does.

So, not any complaints that have really risen to an area where you really worry about integrity or financial mismanagement or anything that I think maybe you or I, our ears would perk up for.

R. BOOTH: At another larger level, my questions after this are very specific but this one, I remember the first time I went on a consultation visit and I didn't have a clue what I was doing.

So, I faked it until I could make it, I kept my mouth shut and watched other people and learned the hard way.

It's not necessarily the best way to learn so talk to me about how you put site visit teams in terms of the training in particular, their expertise and their training, and how you put those together.

C. LITTLE: Thank you for the question. This is an area that we are very proud
of.

We spend approximately, as I am accountable to budgets, somewhere in the neighborhood of $100,000 on average per year training our site team.

Typically, we bring them together in one place and have breakout sessions according to what area of the standards they're working on.

It's been more challenging doing that in the COVID-19 environment but we developed an online learning platform through Moodle that we had a very comprehensive process even during the pandemic, where we had virtual training that lasted for about a month.

We did it concurrently with site team members and members of the Council. So, essentially, what we do is to make sure we calibrate our teams.

That's extremely important, it's part of fairness in accreditation but we tend to use examples that we've had from using data in the past and blinding us so it's not recognizable,
setting up challenges and making sure our teams are calibrated.

And that process, it takes a lot of time and a lot of resources but we devote that. So, we train our academy every year, sometimes we'll have breakout sections but we always have the academy together at a minimum every two years.

Sometimes it's certain sections but training every year. We also do pre-meetings with site teams to make sure that they're in the habit of reviewing the standards.

But it's a very comprehensive process that we've actually won an award for in past years here in the State of Arizona for the way we train our site team members.

R. BOOTH: I think that is so important. We often make too many assumptions so people know what is they're trying to do, which is not necessarily the case.

R. BENNETT: Can I add one thing to that? We also do other training in the feedback
mechanism, as Craig mentioned. We evaluate all of our academy members and evaluators that go out.

We have them with a feedback loop that they self-evaluate each governor.

We provide all of that information to our academy committees so it's another mode where the academy committee or the Council or the chair or the president can go back and do individual training if need be.

We also have a loop, Dr. Poirier started this before he became chair, recognizing that academy members, sometimes there are reports that come into the Council.

We have a Council now and have been for the last five years.

The Council provides feedback to academy members on each individual report they submit to the Council and we have the Council give feedback in certain areas and we provide that back to the academy members as well as part of our training.
So, it's more than just the annual, we do other mechanicals during the year as well.

R. BOOTH: Michael, I've got some more but did you have any questions at this time?

M. LINDSAY: I wanted to ask about the criteria of dealing with student achievement and I'm wondering if you could just talk to us about what it is you all track as far as student outcomes?

How has your work progressed in helping to keep track of things like graduation, student loan default rates? That's been a conversation we've had in a number of different agencies.

I wonder if you could give us an overview around outcomes of student achievement?

C. LITTLE: I'd be happy to, thank you for the question.

We really have a multi-tiered process when it comes to outcomes and they really surround three primary areas, one of those being the completion rate, the second being licensure...
success rate.

And the third really surrounding medical competency outcome achievement. So, with those, we have bright line thresholds. For completion we have -- and all of these were determined for a taskforce that we use regarding student outcomes.

And we've just recently gone through that process because we're in the middle of a standards review. So, when it comes to completion rate we have a 70 percent benchmark that is a bright line threshold.

Essentially, that was determined by way of a process that looked at 21 other programmatic accreditors. We also did a literature review.

We also surveyed the educational programs to found out where their challenges and what their rates are. We track the data by program over the last ten years, look at trends, and look at the analysis.

So, that's really where that process
comes through. It's looked at at least every two
to three years to make sure it's current. That
benchmark is essentially within one standard
deviation of the meeting, that's where that lies.

When it comes to the licensure success
rate, there's an 80 percent threshold on
licensure success within six months post-
graduation. And so what that means is there's a
four-part national board examination.

Students go through the first three
parts of those typically within the educational
program. Most will take the Part 4, which is a
clinical part their last year or within six
months of post-graduation.

And that's how we measure success when
it comes to licensure success. Completion has
actually been climbing a little bit. Licensure
success was climbing until it came to the
pandemic, then there was difficulty with students
being able to sit for a Part 4, which is a face
to face evaluation, and we went through those
challenges.
Still, no program dipped below the threshold but some did still have some challenges. And the last is a medical competency outcome.

We have 31 different competency outcomes and we require every program to have evidence that each of their students have verifiable data in passing each medical competency outcome prior to graduation.

And really, for an accreditator as far as accountability, because our graduates are going to be treating the public, that's really a bright line standard that we hold every program accountable to.

There has to be valid measurements, an authentic tool, to measure each of those 31 competencies and the program has to have evidence that each student has that prior to graduation.

M. LINDSAY: Since CC was first recognized in the 1970s, do you have a sense of how many programs have crossed these bright lines and have had their recognitions removed?
C. LITTLE: I'll give you two examples that are probably within the last recognition period, because I think this speaks to the intersection of assurance and improvement.

I'm going to give you the example of programming. We require programs to report these outcome scores with us on a yearly basis. We watched Program A starting to dip down and so even before they were below threshold, we would require a report.

Program A, we're noticing that your numbers are going down, hopefully you're noticing your numbers are going down, give us an analysis of these numbers.

And so we did this with Program A and Program A took a step back and really thought about this in a manner that what do we need to not only get compliance but how can we improve our program?

So, they did a number of things when it came to improving their student services. They increased their admission requirements and I
think they expressed some fears about that because when you increase admission requirements, one of the fears is maybe we're not going to have the enrollment pool that we typically have.

They actually found they grew their program with these increased admission requirements and they became very successful, not only in completion, more successful in completion, but in their licensure success scores.

And I'll talk about Program B, Program B we noted it was below threshold and we put the program on probation. Program B was very upset about that and sued us in federal court.

And so we went through the process of defending our process when it came to -- this was just over probably, it wasn't over revocation. We were sued in federal court, we won in federal court, and then it was appealed to the 9th Circuit Court of Appeals.

This all happened within the last two years. We were successful in defending our
thresholds and our requirements before the 9th Circuit Court of Appeals.

So, we feel we've had a very thorough scope examination when it comes to those thresholds and the way we utilize those. We do feel it's important for accountability and we do feel it has a paramount importance when it comes to program improvement.

So, again, there have been challenges and how those have played out have been completely different from time to time but that's the way we're moving forward.

Ronne, I'll throw it back to you.

R. BOOTH: I appreciate that response. I've seen too much fold when somebody said lawsuit so I've just seen it too many and I was never afraid to be sued, that's just part of the game.

C. LITTLE: It's expensive.

R. BOOTH: It is but it's a matter of integrity and I think community understanding of program quality, which is an essential piece.
So, related to some of those pieces,
I'm not sure how you use or if you use or what
your awareness is of higher education dashboard,
but many of these pieces are out there in that.

And especially Dr. Poirier, how would
you use those? Do you? And particularly, all of
us are concerned about debt load of students and
their salaries and are they actually able to have
a life once they get into their chosen
profession?

I'd like to for you to address how you
use the dashboard in your work in evaluating what
you do. You've given a sum of that but how much
you use that.

C. LITTLE: Quite frankly, Dr. Booth,
it's a challenge. It's a challenge because the
data out there is very poor and I'll give you the
example, there was the example brought up
earlier.

I've been online with you folks since
the beginning and the example was brought up
about the Wall Street Journal. And quite frankly
that data is poor and unsupported and it pains me on how things can be published like that without any link to reality.

Why it's troubling for this particular discipline is that most graduates go onto become self-employed. Well over 80 percent go to self-employment.

Those that are employees in a chiropractic office is far less than 20 percent.

It's growing slowly but it's not growing fast enough so we can't get the data of self-employed chiropractors, it's impossible. Programs can't get it, the Department of Education doesn't get it.

The Bureau of Labor Statistics doesn't get it so we look at salary.com, we look at a lot of other measurements out there.

But if we take a step back and we authentically look at the default rates on the chiropractic discipline, you'll note that it really aligns with a good measure for success.

For example, chiropractic programs are
sometimes housed in a university environment and
sometimes they're exclusive and it's the only
ting the university has as a chiropractic
program.

If you look at those programs that
only house chiropractic programs, their default
rate is somewhere between 0 percent, not my data,
that's the data that's collected, for a program
like Texas Chiropractic College at 0 percent to
National University of Health Science is
overwhelmingly almost all chiropractic at 0.5
percent, to Life Chiropractic College West, who
we previously accredited institutionally until
they went to WOSC is very low. All of our
programs are very low.

Now, some are housed in universities
that have many, many other programs so I don't
know that's representative. But we know that's
low, we know that students are being successful
and paying back their loans.

Ultimately, we know there's a high
measure of success just looking at some of the
salary.com and other instruments that are out there. But we need to take a look and we need to lead in this area because it's not happening.

And what we're doing as an agency is we are advocating before jurisdictional licensing authorities to take out the granular restrictive language they have in their statutes that chiropractic programs have to abide by.

I'm going to tell you one of the worst states is California.

They have butt-in-the-seat hours requirements that programs have to live by, they have granular curricular requirements that programs must include, including things that are outdated in this day and age of medicine.

There are terrible problems out there and programs can't evolve or transform themselves or be innovative due to not our requirements, but what's in state licensure laws.

So, we need to change that, we need to allow programs to become more innovative and that's the challenge we have in that area.
R. BOOTH: I don't have more questions. I'm going to defer to you for next steps.

CHAIR KEISER: Questions from the Committee? Bob?

(Simultaneous speaking.)

R. SHIREMAN: Sorry about that. I'm trying to comply with federal law. I wanted to ask the agency about the federal link that has been determined since the Council is no longer accrediting an institution for Title IV purposes, you don't need a secretarial recognition for the purposes of Title IV.

I'm curious, you may have heard my comments earlier where I think it's actually better for programmatic accreditors to stand on their own two feet and not use secretarial recognition as a prestige crutch.

So, my preference would be to just let us focus on the institutional accreditors instead of the programmatic accreditors, but it sounds like you are choosing to continue that
connection.

So, I'm interested in your thoughts on why you want to do that and then also whether you are certain the one that the Department is relying on, the research enhancement grant, actually requires programmatic accreditation.

The language is vague in the description of the program.

C. LITTLE: Thank you for the question. I can certainly assure you it's continuing to do this is because of the best interest of chiropractic students.

As has been mentioned earlier, obviously we've submitted the non-HEA research grants which are important for programs and they are linked to programs.

There's also loans for disadvantaged students that are applicable, there's health professional students loans, there's the non-HEA, the research, and the DoD links that again, require the rigor of programming accreditation.

Because it is chiropractic education
these grants are going for.

So, those are important links, we're not doing this for -- I'm sorry, I can't remember the exact word you used but I think it was -- I don't know if it was stature or what that is --

R. SHIREMAN: It was prestige that I used.

C. LITTLE: If you think we're coming here for prestige, I'm not sure how long you've been around, but we've been humbled before this agency. It's not for prestige. It's an exercise in accountability that we think is appropriate for the rigor of programs that are educating future chiropractic physicians.

It's really important, because there's also a link that's not talked about, and that is students that are going forward for licensure in a state that requires them to be educated at a program that is accredited at an agency that's recognized by the Department of Education. So, that's a licensure requirement not for all states. I've talked about the problems that we
see with jurisdictional licensing authorities not changing their laws.

Now, it's not a problem for NACIQI; it's probably not a problem for the Department of Education, but can you imagine going through a chiropractic program and going through all this and not being able to be licensed in a state because you didn't graduate from a program that's accredited by an agency that's recognized by the Secretary. So, it's multi-factorial. We're here because it's important for students.

R. SHIREMAN: So, in terms of people potentially having a real problem, it sounds like it's the state licensing more than the federal link where a student would not be able to get licensed because the state requires chiropractic programmatic accreditation that specifically refers to the Secretary's recognition of the agency, is that right?

C. LITTLE: Correct, but again, our students would not have access to loans for disadvantaged students either. That requires
programming accreditation.

R. SHIREMAN: I have an additional question but I'm fine with going to other people and coming back to me. Either way, we're going to do it.

CHAIR KEISER: Your choice.

R. SHIREMAN: I will go ahead. Let me ask about obviously you have mentioned controversy around chiropractic generally. I've learned a lot about both podiatry and chiropractic with this NACIQI meeting.

And one of the differences that I learned about was that the doctors on the podiatry side, you have doctors of podiatric medicine, it's a DPM, the word medicine is used.

And some of the descriptions that I've seen about why some of these use medicine and some of them do not was that both MDs, actually which are medical doctors, and DPMs are -- they're what you think of medicine as being.

So, they prescribe drugs, they do surgery, and for most of what I saw, all of the
Federal Government websites that I saw that referred chiropractic, it was just doctor of chiropractic or chiropractic without the word medicine.

You mentioned the importance of integrity and transparency in your standards, that's what the advertising requirements are and I wanted to ask about the use of the word medicine in the programs that your schools, your accredited programs, use.

Generally, the programs just say doctor of chiropractic, but in a couple of cases, one of them actually, Keiser University and the other one being National University of Health Sciences, it says doctor of chiropractic medicine.

Does your agency have a standard on the use of the term medicine and describing chiropractic programs?

C. LITTLE: Thank you for the question. I want to make sure we accredit programs that lead to the doctor of chiropractic
A program is able to call itself the name of their program that aligns with the institution mission and the program mission.

We have some programs that use the terminology, medicine, as part of their descriptor. It's not something we require, it is something that again, we have programs that don't do that.

You folks have experienced some of this. There are different paradigms in the profession, some that align with the differing scopes of practice.

As an accreditor, we don't get involved with scope of practice types of nomenclature, we make sure that our standards align with educational quality.

So, regardless of it's a program that calls itself -- if they use that generic terminology of medicine in their descriptor, they still have to meet the same standards, as well as a program that does not use that.
So, it's really not an issue in accreditation. Again, our standards for educational quality align with that and how that program names its program is really within their self-determination.

R. SHIREMAN: Thank you, that's all from me.

CHAIR KEISER: I'm sorry, Mary-Ellen, you're next.

M. E. PETRISCO: Thank you. I have three questions, I think they're probably pretty short. Thank you for this really very helpful conversation so far.

The issue of conflict of interests was raised already and I wanted to come back to that because you do have a relatively limited number of accredited programs.

The Academy of Site Team Visitors that you referred to just a few moments ago, when I looked at that, I saw there were a couple of categories that had only one or two members in them, and I was wondering how you handle that if
there are conflict of interests regarding staffing of those team members because clearly it's a limited community.

So, how do you do that with categories within the academy if there are conflict of interests?

C. LITTLE: I'll begin but I'm going to probably hand this off to my Vice President of Accreditation and Operations because he manages the Academy.

The first thing I want to ensure is that no matter the number, we certainly have a robust enough academy to fulfil our needs when it comes to ensuring that we eliminate conflicts of interests.

We have not had a problem thus far and we will never allow one to occur. Having said that, I want to go ahead and have Mr. Bennett describe the different categories and how they are adequate to fulfil our needs.

R. BENNETT: Dr. Petrisko, which category are you referring to?
M. E. PETRISKO: I don't have it up there because there's too many papers, but when I looked at the list, there were, say there were maybe five or six, seven categories, of visitors. And there were a couple that had one member or two members.

So I was wondering if that person happens to have a conflict, what do you do? Or those people happen to have a conflict?

R. BENNETT: Yes, that's why I asked that category. Because we have seven categories on our academy. And they are based on expertise. We have Category 1 that handles program effectiveness, mission, that, administrative. We have Category 2 that handles finance. We have Category 3 that handles faculty, research, scholarships; those type of things.

So, each one of our categories are different. But that's part of kind of what we -- it's kind of a segue with the training. We manage, myself and my two directors, we manage those numbers in our categories because we've got
to make sure we have a category of each and every
one of those people, when we go out on a
comprehensive visit.

We don't go out with three people from
Category 1, and one from Category 5. Every time
we go on a comprehensive visit, we take one
Category 1, one Category 2, one Category 3, 4, 5,
and then two from Category 6.

Category 7 is for our other residency
programs.

So, just like with the Council, we
keep track of all of the conflicts, of all of our
academy members. We have a running list that we
keep on everyone. And every time we go to
training, we have them update their conflict of
interest forms, so we can update that file we
have. Every time they go on a visit, they have
to update their conflict of interest before we go
there.

And, also, every time we go on a
visit, we have the programs. We send a list of
the programs, so they can sign off to make sure
there isn't any conflict of interest that we're unaware of, and the program has with a particular member.

So, we don't have any problems with the conflict of interest side on our categories, because that's part of my job is making sure we have enough people in each category.

It's a real, it's a very seamless activity in our organization now. It has grown through the years. When I came to the agency in 2003, we have no training, we had no conflict forms. We had no anything.

So, we had to build everything, and build the academy. And the first thing we did with the academy was we built it so that we had equal numbers of people in every category. But we didn't have two, two less so that we are using the same academy members over and over again.

And we didn't have too many, whereas you could go three or four years and you'd never even get in a visit.

So, I actually formulated a process
with the help of the Council and some other
volunteers, to make sure we have a consistent
number. And that number for us is basically
between 48 and 60. And we keep rotating them
through.

There are people that fall off because
they no longer want to serve, or they've retired
or whatever. And we have new blood coming in and
we train them up. And then we keep track of the
entire academy, and we just keep going on a
rotational basis.

So, yes, there are times when we may
have one or, you know, if we're going to a
program, we may have one or two people in that
category that can't go because of a conflict.
And then we may have maybe another one who can't
go because they're not available. And then we
get down to the others.

But yes, we never back down from the
categories. We always have someone there, and we
always are in three different steps assuring that
conflicts are avoided.
M. E. PETRISKO: So, whatever I saw --

R. BENNETT: And documented.

M. E. PETRISKO: -- that looked like

there was a category that had one or two people in the whole category, only had one or two people, I must have misread that.

R. BENNETT: Well, yes. What you're referring to is the residency program side. We started doing some residencies. We haven't brought those into the scope yet.

So while we were going through that process, we had some people who were already trained in the academy, that we also trained for residencies.

We had some people that we pulled from residencies, that also could be trained for our programs. And then we had one category that you saw there. That was simply because that person only goes out on residency programs.

M. E. PETRISKO: Okay.

R. BENNETT: They do not, and have not, been trained in RVCPs, or for our programs.
M. E. PETRISKO: Okay, thank you very much.

R. BENNETT: Sorry about that.

M. E. PETRISKO: That's okay. Thanks for the clarification.

My next question is about the bright lines and the benchmarks. And I don't even know if this question is answerable, but I'm going to throw it out there.

That was a really good description Dr. Little, that you gave of all the things that you do, and how often you look at all the data that you pull together to set the bright line, set the benchmarks.

So, and you talked about completion being 70 percent, and licensure being 80 percent. So, my question when I think about this is always: how does an analysis of aggregate performance and a survey of trends ensure the benchmarks are sufficiently rigorous?

I mean, if stuff's sort of going downhill, and those are the data that you're
pulling from to set your benchmarks, don't you
sometimes say, well, wait a minute, this is going
in the wrong direction? We should have something
that's higher than this.

You talked about setting recruitment
standards higher, and it actually improved an
institution. Can you talk a little bit more
about sufficient rigor and the benchmarks? And
then the bright lines, given what you're pooling
from, and where programs and trends may be going?

C. LITTLE: That's a really good
question. I really appreciate it, and it's
something that our task force really reflects on.
And we looked at it through a difficult time the
last two years because of the pandemic. And, you
know, the fact is we were looking at completion
rates trending up slightly. And we were looking
at some fluctuation in licensing success rates.

But the fact of the matter is, is that
they're really at a level that, that sufficiently
protects students interests. And also because of
the fact that we have some programs that are
really trying to impact their program with
diversity, equity, and inclusion processes. And
trying to grow programs with a wider pool in that
area.

So it's something that we're looking
at, and we're looking at changes in our standards
when it comes to diversity, and how we're going
to you know, be able to be inclusive.

So, in looking at it, the marks are --
or, you know, the question is, is it sufficiently
rigorous? And that's the process that we went
through, by looking at data, by looking at other
programmatic accreditors, particularly if they're
aligned in disciplines that are health related;
professional degree programs and looking at that.
And the overwhelming consensus with the task
force is that they are currently sufficiently
rigorous.

M. E. PETRISKO: So could your task
force say, you know what, these data don't look
right, we've got to bump this up actually, to --

C. LITTLE: Absolutely.
M. E. PETRISKO: Yes, okay, all right.

C. LITTLE: Absolutely.

M. E. PETRISKO: It's not just a reflection of, okay we threw all these data into, into a pool and we pulled out this number, and so that's what it's going to be?

C. LITTLE: No. No, no.

I want to make sure that I emphasize their process was a very robust process of, of going through literature and trying to, and it, we had public members on this task force. We had members from programs. We had a very robust discussion about it.

And the goal, I think, I think every accreditor has the goal that, you know, we want, we want increasing completion. We want to see that trend. We want to see increasing student success.

It's the intersection that you folks described earlier, between accountability and improvement.

So, we have some education programs
that their licensing success is above 95 percent. And, you know what, can we mandate that all of them have that, you know?

M. E. PETRISKO: Right, right. I just --

C. LITTLE: I don't know --

M. E. PETRISKO: -- I just, I'm always concerned if a benchmark or a bright line is too low, people will tend to say that's good enough. But I will leave it at that. You've given me a good answer.

The last thing I want to ask is in the last couple of years, how to the fact that your institutions have been, your programs have been affected by the pandemic, how you dealt with, how they have dealt with distance education, and how you've monitored what they're doing with their program offerings. And then how you have handled your onsite reviews.

So, if you could just give us a little bit of information about that. I know you didn't have to prepare information towards this focus
review, but we'd still like to hear how you handled that.

C. LITTLE: It's my pleasure because in my view, this was one of the best examples we have of an agency, of how our volunteers can spring into action.

So what we did at the onset of the pandemic was, you know, we had programs that offered no distance education. Zero. We had some that had very robust processes.

So we set up a portal on our website to first of all, answer -- programs could send in, programs and/or faculty could send in anonymous questions, and we would answer them.

And so this was something that I probably overtaxed my volunteers with, but we took these questions in and if we took a question in, we typically would have an answer up on the website, you know, within 24-48 hours.

So, a lot of this was informational. What do we need to do? And of course we had some distance education standards that were -- regs
that were changing in that timeline.

So, we worked with programs by way of information sharing. And they cooperated really well together in doing a lot of that. Obviously, we had to pivot, as every other accreditor has had to do, and go to a virtual site visit process.

What we found is that our standards are, were, are very complimentary to the process. And the minimal changes that we needed to make in policy, were quite easily done, and quite easily administered. We found we had excellent feedback from our programs and our virtual processes. We had, a lot of things are going to stick moving forward.

I think it makes it tremendously easier to administrate certain types of visits, maybe where if it's a focused follow-up that's almost exclusively based on data, those make tremendous sense going forward.

We would never supplement the process for any type of a comprehensive evaluation, but
we enjoyed a really good working relationship
between staff and volunteer efforts, to be
successful.

And we had -- well, actually, I'll
maybe turn this over to Dr. Poirier. He served
as chair during the entire pandemic, so I'll let
him speak on the types of work that the council
did.

J. N. POIRIER: Thank you, Dr. Little.
It was certainly a very interesting time, and I
have to say that it was a good collaborative
effort between us as counselors, and the
executive committee, to be able to work very
closely with the staff to be able to support the
programs, support the students during that time.
It was certainly a very difficult early period
during the early months of the pandemic, as you
can all imagine.

In the field of chiropractic, it's
close contact when we talk about interventions
and therapeutic procedures, and when the students
are learning very practical skills and the
application of those skills.

So, shifting to an online education format for many of the programs, even in the clinical setting, became quite challenging for many of them to really re-envision what they did in terms of delivering that type of educational experience to the students.

So, for us working very closely in terms of communication with the programs, was to make sure that the programs knew what the expectations were still, on the side of the agency.

In terms of making sure that the programs knew that they were still responsible to comply with the standards during that period, and that the educational experiences that during the instruction portion, had to be purposeful and meaningful.

And continued interactions obviously with students, that were regular and substantive during those type of educational experiences.

And that type of discussions and back and forth
with the programs was really welcome.

Programs had questions also based on their own policies and procedures, that were not a part of the standards of the agency. But that there were their own educational requirements.

And, for example, they had a strict qualitative requirements that they had to perform. Students, for example, in one program, would have to perform a certain number of initial patient examinations, and if they were not able to see patients during that time, programs had to shift, pivot, and modify those types of policies.

So, our agency was able to provide some flexibility, certainly for those programs to be able to modify those policies, so that the students could continue to receive and participate in this meaningful educational experience. So --

M. E. PETRISKO: Was it possible for any student to complete his or her program without really doing hands on clinic?

J. N. POIRIER: I'll turn it over to
Dr. Little to start with the answer.

C. LITTLE: Well, due to the flux of the pandemic, programs had to be innovative, but they did end up getting students typically into some clinical settings. Whether it be, you know, we have a small group come in on Tuesdays, Wednesdays, or Thursdays. They had to be very innovative.

But at the end of the day, we never lifted the requirement for demonstrating competency outcomes. We never lifted the requirement for completion. We never lifted the requirement for licensing success.

Dr. Poirier is a administrator in a program in New York. They were probably the hardest hit state, and their students were not able to take the final licensing success score for almost a year. Which ultimately affected their scores, but it never dipped below the threshold.

But if it would have, I think it would have been a Council discussion on how to manage
that. But we knew which students were being impacted.

But the fact is, is that programs became more innovative. At the end of the day, they had data to show that their students were competent in each of these outcomes, and they were able to show the other, you know, it was incredible but they were, they pulled off the incredible.

M. E. PETRISKO: Great. Thank you very much. That answered my question.

CHAIR KEISER: Wally, you're up. And then Kathleen.

W. BOSTON: Thanks, Art. So earlier you mentioned The Wall Street Journal article. I don't know if you mentioned it because I mentioned it when we were talking about the podiatry.

But I researched that pretty extensively when it came out this summer, because the score card doesn't report these numbers directly on the score card, they just provide the
dataset.

And I talked to the Department and I guess I would encourage you since we're looking at our own dashboards, to possibly even send our committee a letter.

Because you know, when you have data that's a misrepresentation, institutions can be penalized tremendously for misrepresenting statistics for graduates. I don't know whether accrediting bodies can, other than when they meet with us.

But I think your explanation is reasonable. If you have a high percentage of graduates who are self-employed, certainly when I look at these numbers, you know, there are only, let's see, there are only eight institutions of the ones that you accredit, who are listed.

Which there are also data classification issues and that some schools report, instead of reporting their doctoral degrees as professional degrees, they report them as doctoral degrees, which means they're in the
Ph.D. Category, and they don't show up when you try to do a search for chiropractic and professional.

So, I for one believe that there's value to the college score card, but I also believe that there's only value if the data is good.

And the data is only going to be good if people look at it, and actually pay attention to it. And send letters in to either the Department or to this committee, if we have a subcommittee to look at dashboards.

So, that's really a comment, not a question. But if you have any thoughts about that, I'd be glad to hear them.

C. LITTLE: No, thank you. You bring up a very good point and, you know, I think that it was, and again, I'm not here to criticize The Wall Street Journal.

But the fact is, is that, you know, there was no, we have a Ph.D. candidate that's on your committee. If you're going to put out and
make conclusions that based on data without
having any reference to the data, I think that's
problematic. I know I would not have received my
doctoral degree if I would have tried that.

I think that that's problematic and so
again, whatever data the Department can share is
great. I don't know that we've, we're currently
not on the dashboard. So, I don't know that,
what we can do in that respect.

W. BOSTON: Well, you are in the
dataset. So, you can download the dataset from
the score card, and you will find schools that
issue professional doctorates listed.

You will probably find your other
schools listed, but they're not in the
professional chiropractic category because an
institutional data person at that institution
submitted it under doctoral, and not under
professional.

C. LITTLE: Thank you.

CHAIR KEISER: Kathleen?

K. ALIOTO: Wondering if you could
just, excuse --

CHAIR KEISER:  You muted yourself, Kathleen.  There you are.

K. ALIOTO:  Could you tell me on the Council the percent of people who are women?

C. LITTLE:  It's interesting because I work for an executive committee that is almost exclusively female.  There is one male on the executive committee.  Our past chair before Dr. Poirier was Dr. Elizabeth Goulard, who was a public member and served as our chair for over two years. I'd have to look at it, but I believe the majority of our council is made up of women.

K. ALIOTO:  Thank you.

R. BENNETT:  Dr. Little, we have eight and eight.

C. LITTLE:  Okay, thank you.

CHAIR KEISER:  Any other questions?

Thank you very much, Dr. Little, and Dr. Poirier.

And I'd like to bring back the staff member to respond.
K. SIMMS-COATES: No, I have no comments.

CHAIR KEISER: Herman, you have a comment?

H. BOUNDS: Thanks. I want to make sure I get it in this time.

I just wanted to reiterate one thing I think that Dr. Little might have stated. But it's relating to the federal link for this particular agency.

So, when you look at the link, you know, it talks about the link being for colleges and accredited institutions that provide education and training, leading to a health professional degree. And then it lists the specific disciplines.

But then at the end of that, it clearly states that the accreditation must be provided by a body that is approved for the purposes of, you know, of that specific discipline by the Secretary of Education. So, that's both.
That clearly ties their accreditation, their recognition by the Secretary, in order for an institution to receive these particular grant funds. So, that's why their federal link.

And, in this case, it's pretty concrete in this one particular, in this particular issue. And that's why we found them compliant in that area. So, I just wanted to point that out.

And really quickly, only other thing I wanted to bring up is the question about the programmatic agencies LG said about their, about them not having to comply with separate independent.

You're right. I made a comment about rulemaking but what I meant to say was, it would take the statutory change, and then also rulemaking.

I just want to make sure that everybody understood that.

Thank you.

CHAIR KEISER: Bob? Bob?
R. SHIREMAN: Yes, thank you. I wanted to thank Herman for reviewing that federal link question. The words in the paragraph that Herman read are, accreditation must be provided by a body approved for such purposes by the Secretary of Education.

And the only other reference in that paragraph to accreditation, is accredited institutions.

It is vague because those, just those health disciplines are listed in the paragraph, but those disciplines also include things that have no, no programmatic accreditation, like biomedical engineering, and prosthetics and orthotics, and kinesiology. Things like that.

So, it doesn't seem like these such purposes actually refers to the, the list of programs.

So, I just, I guess I am interested in to the extent we approve for renewal, this agency with some kind of review of something. I think this, the staff recommendation is for a
monitoring report.

I feel like this federal link question needs to be double-checked. Because it doesn't seem like it actually requires programmatic accreditation in that whole list.

H. BOUNDS: Bob, we have double-checked it with everyone before we made our staff recommendation. Our recommendation is that the federal link meets the requirement.

The last sentence there, accredited by, accreditation must be provided by a body approved for such purposes by the Secretary of Education.

Doctor of Chiropractic is listed there. I don't think there's any way that we could recommend anything different.

You have an idea about what you want to recommend, but there's no way that we could disapprove them based on the language in that grant.

R. SHIREMAN: I was asking for a double-check of it. But if you think you've
double-checked, then fine.

H. BOUNDS: We have.

CHAIR KEISER: Thank you. Just before
we go to the motion, I do want to announce that
Bob brought up K.U., Keiser University's,
chiropractic the way we advertised it.
And that is the way it is listed in
the state of Florida, from the Board of
Chiropractic Medicine. So, that's why we have
that particular title.
I would entertain a motion from the
readers?

R. BOOTH: Okay. Art, Mr. Chair,
given I'm going to in a sense parrot the staff
recommendation, because I think it's appropriate,
I move that the NACIQI recommend that the senior
Department official grant the Commission on
Chiropractic Education renewed recognition for
five years, and require a monitoring report if an
appeals committee is assembled during the
recognition period, to demonstrate the agency
adheres to panel composition requirements as
outlined in 602.15(a)(4).

CHAIR KEISER: Is there a second to
the motion?

M. LINDSAY: I will second it.

CHAIR KEISER: And that was?

M. LINDSAY: Michael Lindsay.

CHAIR KEISER: Michael. Okay, is
there any discussion on the motion?

Hearing -- are those hands up because
you want to make, do you have a question on the
motion? Mary Ellen? Bob?

Mary Ellen, you do?

M. E. PETRISKO: No. I just want to
understand.

So, if there is a monitoring report,
that would be reviewed by staff and be deemed to
be sufficient, and then everything is fine. And
the five year period of recognition just, the
clock keeps going.

If there is the monitoring report, if
there is no appeals committee, there's no
monitoring report.
So, it's up to the agency to determine yes, can we have an appeals committee, so now we have to put this report in to say what's going on here.

Should it not be found to be sufficient, what happens to the five years, anything?

And this is all, you know, if, if, if. But it's not clear to me what happens.

CHAIR KEISER: Herman?

H. BOUNDS: Yes, so here was the situation is that we took the monitoring report approach, because we couldn't find them non-compliant and request a compliance report, because we don't know if they're ever going to have an appeal.

So, they may not be able to demonstrate that within one year. So that's why we took the approach of requiring a monitoring report if they do have an appeal within the five year recognition period. Once we would get that information, we would look to see if that appeals
panel was of the proper composition.

It was just a case of we couldn't
apply the compliance report language, because we
didn't know if they could ever demonstrate that
in 12 months.

And then if they couldn't demonstrate
it in 12 months, what do we do after that,
because we don't know when they're going to have
one of those, whether they're going to have an
appeal or not.

So, this way, they would be
substantially compliant throughout the five years
until, you know, until they come back for a
renewal of recognition.

M. E. PETRISKO: So, I don't remember
that in other cases there were, because there are
a lot of accrediting bodies that don't get
appeals.

H. BOUNDS: Right.

M. E. PETRISKO: So, in every case you
would say give us a monitoring report just in
case, and not wait for the next review to see if
there was an appeal that it was done correctly?

H. BOUNDS: Well, the problem, Mary Ellen, is that since they've only had two appeals, that means that they applied their policy correctly half the time. They were 50 percent on having a proper composition.

We felt as staff we couldn't find them fully compliant here, because they haven't demonstrated that they consistently apply the policy, or apply the requirements.

So, the only choice for us was then to require this monitoring report. And then if they do have an appeal, we would be able to review that.

This is one that was kind of, it was really stuck in the middle. I think we would have not done due diligence, or if we would have said they were fully compliant. If we just said okay, they're fully compliant, we think they're going to be okay at some point in the future.

So, this one we're kind of stuck in the middle with what to do.
M. E. PETRISKO: Okay.

H. BOUNDS: So, we figured this, that the monitoring report and a substantial compliance, was really the best way to go.

M. E. PETRISKO: Okay, thank you.

H. BOUNDS: Okay. And, Art, I can't raise my -- I can't lower my hand because of the -- I can't get to the controls. Okay, there we go.

Thank you.


CHAIR KEISER: It keeps going on and off. Are there any other questions or a discussion on the motion?

Sensing none, we'll do a roll call.

Kathleen?

K. ALIOTO: Yes.

CHAIR KEISER: Roslyn? She may have gone.

G.A. SMITH: Yes, she voted yes right before she left. If that's possible.
CHAIR KEISER: We'll see if we need her. Ronnie?

R. BOOTH: Yes.

CHAIR KEISER: Wally?

W. BOSTON: Yes.

CHAIR KEISER: Jill?

J. DERBY: Yes.

CHAIR KEISER: David?

D. EUBANKS: Yes.

CHAIR KEISER: Michael Lindsay?

M. LINDSAY: Yes.

CHAIR KEISER: Molly?

M. HALL MARTIN: Yes.

CHAIR KEISER: Robert?

R. MAYES: Yes.

CHAIR KEISER: Mary Ellen?

M. E. PETRISKO: Yes.

CHAIR KEISER: Michael Poliakoff?

M. POLIAKOFF: Yes.

CHAIR KEISER: Claude?

VICE CHAIR PRESSNELL: Yes.

CHAIR KEISER: Bob?
R. SHIREMAN: Yes.

CHAIR KEISER: Steven?

S. VAN AUSDLE: Yes.

CHAIR KEISER: It looks like the motion carries, and we did have a quorum. Bob --

VICE CHAIR PRESSNELL: Claude voted yes.

CHAIR KEISER: I see that, oh, yes.

VICE CHAIR PRESSNELL: There we go, thank you.

CHAIR KEISER: Well, thank you very much. I don't, it's 3:00 o'clock. I think we'll probably just adjourn for today.

What do you think members of the committee?

K. ALIOTO: After one more?

CHAIR KEISER: I don't think we have any more today scheduled.

G.A. SMITH: The next group is available in case you wanted to do that. But it's really up to you. They're ready, if you are. But we can also wait until tomorrow.
Perhaps you can get a pulse from the committee.

CHAIR KEISER: Any kind of discussion or a motion by the committee whether to continue, or to continue tomorrow?

S. VAN AUSDLE: It's pretty early out this way. We could do one more.

I think if our sources are ready.

CHAIR KEISER: I think we can use a --

(Simultaneous speaking.)

R. BOOTH: Molly and Bob.

CHAIR KEISER: You ready, Bob?

R. MAYES: Maybe just a quick, short break?

R. SHIREMAN: I'm ready. I would be unmasked tomorrow, but I'm fine with doing it with the mask, so either way you want to do it.

CHAIR KEISER: Robert asked for like, a 10 minute break. Would that be okay with everyone --

(Simultaneous speaking.)

CHAIR KEISER: Let's make it 10 minutes, and it is 3:05 and we'll continue at
3:15, and we will go to the, let's see, the
Commission on the English Language Program
accreditation.

Okay, see you in 10 minutes.

(Whereupon, the above-entitled matter
went off the record at 3:06 p.m. and resumed at
3:15 p.m.)

CHAIR KEISER: Welcome back. We are
about to do our last agency for the day, and this
is a renewal of recognition for the Commission on
English Language Program accreditation, or CEA.

Our primary readers are Molly Hall
Martin, and Bob Shireman. The Department staff
is Reva Mallory.

Bob, Molly, you're up.

R. SHIREMAN: Great, thank you very
much, Art. So, I am happy to have the privilege
of presenting the petition for continued
recognition of the Commission on --

CHAIR KEISER: You slowed down, Bob.

Is everybody here still all around?

Bob, I think your internet has slowed down a
little.

Patrick, any recommendation?

R. SHIREMAN: Am I back?

CHAIR KEISER: You're back. There you are.

R. SHIREMAN: All right.

CHAIR KEISER: You changed boxes.

R. SHIREMAN: Oh, that's funny. Well, I had to move boxes, I guess.

CHAIR KEISER: What was that old show where they, celebrities in little boxes?

R. SHIREMAN: Yes, yes, the one in the middle, yes.

All right, so anyway, the CEA does not accredit institutions for the purposes of Title IV programs.

So, I definitely found this a little bit confusing because it talks about accrediting institutions and programs, but for kind of the way, for our purposes, it's really a programmatic accredits from the standpoint of Title IV.

So, that is what we will be discussing
today. Thank you.

CHAIR KEISER: Okay. Could I introduce now the staff?

R. SHIREMAN: Yes, please.

CHAIR KEISER: Ms. Shackelford, to discuss the agency.

R. SHACKELFORD: Hello and good afternoon, Mr. Chairman and members of the Committee. My name is Reha Mallory Shackelford, Esquire, and I am providing a summary of the review of the petition for renewal for the agency the Commission of English Language Program accreditation.

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

The scope of recognition for this agency is the accreditation of post-secondary, non-degree granting English Language programs and institutions, and the geographic area of accrediting activities is the United States.
This recommendation is based on the review of the agency's petition and supporting documentation, in addition to an observed virtual commission meeting on December 2020.

Our review of the agency petition, found that the agency is in compliance with the Secretary's criteria for recognition.

There were no complaints filed during this review period, and there are no third party commenters on today's agenda.

Representatives from the agency are here to respond to your questions.

Thank you.

CHAIR KEISER:  Thank you, and I'm sorry I messed up your first name.

R. SHACKELFORD:  No worries. It's okay.

CHAIR KEISER:  Are there any questions for Reha?

R. SHIREMAN:  Yes, I did have one question for Reha.

R. SHACKELFORD:  Sure.
R. SHIREMAN: The Department of Education reviews this agency because of the Department of Homeland Security's requirements for Secretary recognition.

Do we know anything, or do you know anything, about what the DHS's concerns, issues, what it is that they want to make sure is, you know, is the case about, that this accreditor and the institutions themselves?

R. SHACKELFORD: Well, I can't speak to concerns about a different department, so, no, I don't have that level of intel. So, unfortunately, no.

R. SHIREMAN: Okay, thank you.

R. SHACKELFORD: Sure.

CHAIR KEISER: Okay, I'll invite the members of the agency to come forward.

There you are, Heidi and Ian.

I. Collins: Okay, good afternoon, everyone. Thank you for the opportunity to be with you here today, albeit virtually, to discuss the petition for continued recognition for the
Commission on English Language Program

accreditation, which hereafter I'll refer to as

CEA.

My name is Ian Collins. I'm the 2022

Commission chair. I'm the Academic Assistant

Director of the School of Foreign Languages at

Yasar University, in Istanbul, Turkey.

As you can see, I'm joining you today

from CEA's offices in Alexandria, Virginia.

CEA is separate and independent, and

operates as a 501(c)(3) non-profit corporation,

registered in the State of Virginia.

We accredit post-secondary intense

English programs and language institutions with

U.S. and internationally.

Currently, CEA accredits 345 programs

and institutions, 313 of which are in the U.S.

CEA is a hybrid accrediting agency and we

accredit 134 programs, and 179 institutions in

the U.S.

The Commission has 13 members,

representing the field of post-secondary
intensive English programs, 11 of whom are
elected from the field, and two are appointed
public members who do not come from the field.

The Commission serves as the
accreditation decisionmaking body, and non-profit
governing board to the agency.

I'm joined by CEA's Executive Director
Heidi Vellenga, who is the next point.

Send it to you, Heidi.

H. VELLENGA: Thank you. Good
afternoon, chairman Keiser, and other NACIQI
members and Department staff.

We'd like to thank Dr. Herman Bounds,
and the members of the accreditation group,
including the staff and analysts assigned to CEA
throughout our current recognition period,
including Valerie Lefor, Mike Stein, Stephanie
McKissic, and our current analyst, Reha Mallory.

Since 2019, each has provided valuable
feedback throughout each stage in the process, as
we navigated the revised recognition procedures.

We'd like to especially thank all the
staff analysts who took the time to understand
CEA's unique status as an accreditor, whose
federal link is through the Department of
Homeland Security.

And to thank Reha Mallory, in
particular, for her careful review,
responsiveness, and accessibility throughout the
petition response period.

I would also like to thank the primary
readers, and welcome any questions from the
members of the Committee at this time.

CHAIR KEISER: Thank you. Questions
from the primary readers, Bob, Holly, Molly?

R. SHIREMAN: Thank you. Let me start
with the one that I asked Reha. From your
perspective, obviously you must have more
interaction with the Department of Homeland
Security, than maybe the Department of Education
staff do on this issue.

What interests, what does the
Department of Homeland Security want from your
agency in terms of assurances?
Are there particular problems that you're on the lookout for that, that led to the law that's called for you to be recognized by the Secretary?

H. VELLENGA: Yes. So, as you can see from our petition, the CEA was founded in, began accreditation activities in 1999, and I think we all know what happened in 2001 in September of that year.

And we had always planned to be recognized by the Department of Education, as is good practice among accreditors.

And throughout some advocacy work through professional organizations, there was a desire to you know, regulate the field.

And that accreditation Act, which was signed into law in 2010 and took effect in 2013, was really to ensure that schools are reputable, following their practices, and that their admissions policies allow for admittance of sort of bona fide English language training students.

And so CEA existed, but didn't
participate in any of the advocacy for that
legislation, which really happened independently.

And we frequently respond to the part
of the Department of Homeland Security, the
student exchange and visitor program, SEVP, where
we communicate with their school certification
unit, to just verify that schools are accredited.
But we each perform our independent review.

So, we don't do a separate
verification of SEVP's compliance, we just look
at the school being in compliance with its own
policies.

R. SHIREMAN: Thank you. I noticed
that you probably heard that I have asked
questions about public, public members of
commissions. And some other agencies just sort
of have a negative where a public member is
anybody who doesn't have a conflict of interest,
like working for a school or whatever.

I saw what seemed like a good and
appropriate positive definition that you, in your
standards, that there are people who have an
interest in the welfare of international students.

Can you say a little bit about your public members, and the role that you see them taking on?

I. Collins: Yes, we have, as I said earlier, there's 13 members of the Commission, two of which are public members. And they're not from the field of English language teaching. They are typically from an education background.

And currently our two public members, one is a retiree. He's involved at Oregon University international programs; and, the other public member is an expert in distance learning from the University of Central Missouri.

Neither of them are paid. None of the public members are paid. As I said, they are typically from an education background. It's a steep learning curve. English language teaching is sort of on its own a little bit. And so, you know, we feel, you know, to not come from an education background at all, might be quite
difficult, I think. But that's it. That's not
to exclude anyone.

But you know, they're bringing
particular experience in international programs
and experience in international students, which
is obviously beneficial to us, and giving us a
more sort of rounded perspective as to what we
will do.

R. SHIREMAN: Thank you.

Let's go to Molly. I know Molly had
a question or two.

M. HALL MARTIN: Good afternoon. First
of all, thank you for being here today.

By now we've all heard about the
impacts of the pandemic, and the shifts in
instructional method giving changing guidance
from local, state and federal levels, and the
effect on student achievement broadly.

International students have the added
stress of visa requirements related to
instructional modality hanging over their head.

Given the nature of visa requirements
for in-person learning, and the unique nature of
the student body served by the programs you
accredit, how have you all navigated the
challenges presented by the pandemic, both
broadly and specific, to the unique needs of
international students?

I. Collins: Okay, thanks for that
question. Yes, most of our sites, if not all of
them, very quickly pivoted to online education,
and were forced to do so. And we had to pivot
accordingly with them.

Actually, we have set up a distance
and education task force, which is part of the
CEA, and that was established in 2021.

And its charge is to look at our
policies and procedures, based on the U.S.
Department of Education regulations which are
effective, which were effect in July 1, 2021.

And it's going to recommend any
potential changes that we may need to ask
regarding eligibility criteria.

But that said, we made a number of
policy decisions and maybe Heidi can elaborate on those a little bit more than I can, to cope with the situation, but actually it went very well.

Whether in the long term, language learning online is going to be an effective way of delivering education for most students, is very debatable. We're kind of waiting for research on that, so that we know whether it is a good way to learn the language.

We suspect anecdotally in some of the feedback we've had from the constituent counsel, who will be the accredited sites, that it isn't something that's preferred by most. And, where possible, we have gone back to face-to-face teaching. But the distance education task force, as I said, are looking at that.

Is there anything you want to add to the conversation?

H. VELLENGA: Yes, thanks, Ian. So, one of the big differences between students who come and study in the United States on English language training visas, and degree seeking
students, is the sort of requirement for a full course load.

And so for English language training students, a full course load is 18 hours per week, contact hours, face-to-face. Somebody earlier said butt in seats.

But you know, it's not permitted for English language training students, to do any portion of their studies online.

Unlike undergraduate or graduate students who can take one or two courses on their course load online, in a given semester and maintain their status as a valid international student.

So, one of the things that CEA did was to release a statement on Covid-19 in March 2020. And that allowed, sort of extended the flexibilities that were afforded by the Department of Education, but also SEVP and the Department of Homeland Security, to our accredited programs in the institution.

And so they were able to quickly adapt
instructional modalities with a notification. We considered that not to be a reportable substantive change, but it required notification.

So, we set up a separate mail box, and get those message periodically.

So, they needed to provide us a notification of any kind of procedural adaptations made as a result of, or in response to, the pandemic.

And, you know, in March we sort of thought it will all be over by August. And by August we thought, oh, well, this will be over by the end of 2020.

But as time went by, we added as Ian mentioned, additional temporary policy adaptations, which allowed us to do hybrid site visits; allowed for people who were unable to come to attend a work, in-person workshop to extend their term of accreditation on a limited basis.

And we began to conduct virtual reviews in August of 2020, which also involved
virtual class observations.

So, we were able to see, you know, how
the students are doing, and how the classroom is
functioning as a remote situation.

As Ian mentioned, particularly amongst
language educators and also students, there's a
real preference for face-to-face instruction.
And so we don't know exactly how long those
temporary flexibilities will last.

But for all incoming new students on
student visas, they must study at least a portion
of their week online in hybrid, hybrid format for
language training students.

And so we're seeing all kinds of
different permutations of that. And planning,
depending on where you are in the country, and
university shutdowns, and school openings and
closings.

It's been really variable across the,
over 300 programs and institutions. And so they
continue to report to us.

But I think because SEVP requires
students to study the in-person for 18 hours a week, unless that changes, we'll still continue to have a lot of in-person instruction.

M. HALL MARTIN: Thank you, back to you, Bob.

R. SHIREMAN: All right, I think we're ready for other members of the committee.

CHAIR KEISER: Yes, other members of committee, any questions?

I can't believe that.

Oh, David, go ahead. You got me worried.

D. EUBANKS: Sorry to disappoint you, Art.

(Laughter.)

D. EUBANKS: Well, thank you. I have kind of a low stakes question, and I'm hoping to get a candid answer.

You may be aware that in July, the NACIQI subcommittee published a report, that was focused on the changes to the student achievement standard language, some kind of minor changes
that have implications nonetheless.

And those my understanding is, don't apply in this case because it hasn't kicked in yet. But I want to ask the question as if it did, because I think it's important.

In the accreditation standards, there's one on student learning outcomes, which was a topic that the subcommittee considered. It's Curriculum Standard 2, looking at the other screen here. And one of the sample team reports cited the program, because they didn't like the way they had written these student learning outcomes.

They didn't like the verb understand. For example, they quote one of them it doesn't work, the student learning outcome they didn't like one of them was, understands simple personal solution messages.

And the complaint was that that verb isn't, it isn't a verb that's observable. And here's more in that vein.

But I wanted to get your reaction as
to whether this, is this the team that just
exceeded its mandate and was too enthusiastic, or
is it actually kind of standardized that the
accreditor would be looking at the verbs used by
the student learning outcomes?

H. VELLENGA: So, I can tell you that
I have a Ph.D. in Applied Linguistics, and most
of my commission members are former language
teachers. All of the peer reviewers come from a
language teaching background.

So, grammar is often at the heart of
many decisions that are made by our agency, and I
think that's just a feature of the field we
represent.

In our standards document there's a
glossary, and in the glossary we have a
definition of student learning outcomes that uses
those terms of observability and measurability.

And so what we encourage review teams
to do, is take sort of a broad view of the
student learning outcomes in general.

And so it's unusual to have a specific
example of one student learning outcome being deficient in that manner.

But for language learning, we were really looking for you know, some kind of thing that could be measured by an assessment.

And so to measure understanding is a very passive sort of skill, and hard to demonstrate. And so that would be one reason that a team could cite that.

I'd also like to say that every review team is comprised of a, different individuals that need to decide on a finding that goes before the commission that is used to make a collaborative decision about whether or not the institution, or program, is compliant with the standard.

And at each stage, there's an opportunity for the site to respond, and it is afforded due process in that way.

D. EUBANKS: Okay, the part of the, what the subcommittee looked at was the new language, which seems to indicate that agencies
should be pretty clear about what standards for peer review are.

And maybe there's somewhere in the culture of teaching the subject that this is clear understanding, but I looked in the glossary you mentioned and the standards themselves, and I didn't see anything nearly that specific. It's a list of, you know, verbs that are acceptable or not

And I hope you will take my point that this is the kind of thing that can get accreditation a bad name. It makes us look like, you know, bureaucrats that are just nitpicking at checking boxes, and stuff like that.

And just to push back a little bit, they're not complaining about the lack of direct objectives in this thing.

They're complaining about the specific word, and they're saying that the word, the verb understanding can't be observed.

Like, you know, in history if we wanted to know does the student understand that
the Revolutionary War came before the Civil War.

We want to know if they understood that. You're implying that there's no way we can understand that. It's sort of an abstract high/low.

And your own standards used the word understand in a very similar kind of context. So, if the learning's not understandable, then some of your standards also aren't observable.

I'm going to stop here. I just, I think I made my point that this comes across as kind of silly.

And if the point is actually to get at measurement, you know, observability, that's distinct from these sort of superficial language features.

It's really more about the quality of the data that's collected. And I think the, you know, any standard handbook of measurement could make that point much better than I could.

So, thank you for your time and your patience.
CHAIR KEISER: Thank you, David.

Any further questions?

Seeing -- oh, Kathleen.

You're muted, Kathleen.

K. ALIOTO: How many students do you serve?

H. VELLENGA: So, international student enrollment has dropped precipitously as a result of the pandemic. But we do accredit several large sites overseas, which are not really within the purview of the Department's recognition.

But right now, there are close to 100,000 students that are international students.

But there are several different ways international students are counted, and those numbers aren't quite consistently presented across the various forum.

But ESL students, as counted by the Open Doors report, which is produced by the International Institute of Education, has numbers for last academic year that show intensive
English students represent about 2 to 4 percent of the total international student population.

So, I know that that's not a real answer, but that the numbers are not readily available for our field and level.

K. ALIOTO: But if it's 2 to 4 percent, so that would be 2 to 4,000 students here?

H. VELLENGA: I think it's more than that. I'd have to look it up to be sure.

K. ALIOTO: This is why I like to have numbers of students.

But the other question is, all of these students are involved in either have a job with, with a company or something, or an academic position to go into?

Is that what all of this training is around? Or did I miss, miss?

H. VELLENGA: So, all of the students who come on non-immigrant student visas, have to be full-time students. And what they did before in their home countries could vary. They could
have just finished high school; they could be
sort of young professionals who are looking for
expanding their job skills, or job training;
seeking to be admitted to U.S. institutions of
higher education after some initial language
training.

But we really have a wide diversity of
site types that we accredit. So, there's some
sort of, you know, vacation English language
training short-term things what people come and
surf in the afternoon, and study English in the
morning.

And other more rigorous academic
preparation programs really designed to get
students into a particular undergraduate or
graduate degree program.

I would say the majority of students
are interested in pursuing international, you
know, higher education in the United States.

But there are a certain number who are
coming for their own professional or personal
fulfilment.
K. ALIOTO: But there's not a category of people who are coming, just because they want to come to the United States to live for the rest of their lives?

H. VELLENGA: No, that would be a different category of people. So, they would come either on immigrant visas, or through other means. But, typically, you know, the majority of our enrollment is on those full-time F-1 non-immigrant visa students.

K. ALIOTO: Do you train any immigrant visa, people who have immigrant visas?

H. VELLENGA: So, some of our institutions enroll students, particularly in areas where there is workforce training that involves English as a second language instruction.

K. ALIOTO: Uh huh. So, like farm workers, or?

H. VELLENGA: Not really. I don't know, I can't think of any schools we accredit that work with migrant communities.
But there's lots of sort of permanent residents, or other spouses of H-1B visa holders, H-4 visa holders that study full-time.

So, some of those, and then, you know, just like, a lot of the Afghan refugees are beginning to be funded to study in several English language programs.

So, there is a certain amount of non-immigrant students that, that do study at various institutions.

K. ALIOTO: Thank you.

CHAIR KEISER: Any further questions?

I bring back Reha to, do you have any comments, Reha?

R. SHACKELFORD: No, I don't have any more comments. Thank you.

CHAIR KEISER: Okay. Any questions for Reha?

Sensing none, do I have a motion from either of the primary readers?

R. SHIREMAN: I move to accept the staff recommendation.
CHAIR KEISER: Is there a second?

J. BLUM: Second.

CHAIR KEISER: Moved and seconded. Is there discussion?

Boy, this is a different group today.

Hearing no discussion, we'll go to a roll call vote.

Kathleen? Kathleen?

K. ALIOTO: Yes.

CHAIR KEISER: Yes, good.

Roslyn is not, she's on an airplane?

R. CLARK ARTIS: Yes, I'm here.

CHAIR KEISER: Oh.

R. CLARK ARTIS: I'm back.

CHAIR KEISER: Welcome back. That was a short flight.

R. CLARK ARTIS: Yes, it was.

CHAIR KEISER: Jennifer, she also may have been on a flight, but she's not here.

Ronnie?

R. BOOTH: Yes.

CHAIR KEISER: Wally?
W. BOSTON: Yes.

CHAIR KEISER: Jill?

J. DERBY: Yes.

CHAIR KEISER: David?

D. EUBANKS: Yes.

CHAIR KEISER: Michael Lindsay?

M. LINDSAY: Yes.

CHAIR KEISER: Molly?

M. HALL MARTIN: Yes.

CHAIR KEISER: Robert?

R. MAYES: Yes.

CHAIR KEISER: Mary Ellen?

M. E. PETRISKO: Yes.

CHAIR KEISER: Michael Poliakoff?

M. POLIAKOFF: Yes.

CHAIR KEISER: Claude Pressnell?

VICE CHAIR PRESSNELL: Yes.

CHAIR KEISER: Bob Shireman?

R. SHIREMAN: Yes.

CHAIR KEISER: Steven Van Ausdle?

S. VAN AUSDLE: Yes.

CHAIR KEISER: It appears that the
motion passes. Wow. I think that's a record for
the, for this committee.

George, as long as you've been here
it's a record, huh? All this --

(Simultaneous speaking.)

G.A. SMITH: What's the record that
you're referring to?

CHAIR KEISER: That everybody's
agreeing today.

G.A. SMITH: Oh. No, no.

(Laughter.)

G.A. SMITH: I've seen it happen
before. Maybe not throughout the entire day.

CHAIR KEISER: You guys did a great
job today.

(Simultaneous speaking.)

K. ALIOTO: We have softballs.

CHAIR KEISER: We do. Well, they
were, staff did a great job getting them prepared
for us.

So, if no further business today,
tomorrow we'll deal with the Commission on
Radiological Technology, and then we will have a policy discussion, at which hopefully we'll be able to finish before lunch.

K. ALIOTO: Great.

CHAIR KEISER: George, anything you want to bring up?

G.A. SMITH: No, that's it. Get some good rest and we'll see y'all tomorrow morning then at 10:00.

CHAIR KEISER: Thank you all. We'll see you tomorrow at 10:00 o'clock.

(Whereupon, the above-entitled matter went off the record at 3:47 p.m.)
Presently

presiding

press

presidential

private

prestige

present

prevailing

presiding

Pressnell

prestigious

pretext

pretextual

pretextualized

pretextualizing

preface

prejudice

prejudicial

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment

prejudgmental

prejudgment
345 242:16
34FR587 131:1
4 3:2 143:15,16 144:8
168:14 185:12,20
204:7 261:1,6
4,000 261:7
40 23:4
42 4:18
47C-4 4:16
48 206:4
493 75:15
5 204:5,7
5,000 48:17
50 145:17 232:5
501(c)(3) 242:11
56 48:12 49:6
57 3:8
58 3:12
6 150:16 204:8
6- 150:11
6-month 150:15
60 206:4
600 150:14,16
602 131:2,3
602.15 165:7
602.15(a)(4) 229:1
602.19B 62:14
602.20A 66:21
60216 112:8
60217 112:8
60218 112:9
62 14:5
64 175:6,7,12,15,21
177:18
650 96:3
68.7 69:22
697 96:1
7 91:13 92:2 144:1
204:9
70 68:13,19 147:15
184:11 208:16
70,000 102:5
72 69:22
73 69:17,22 70:2
75 73:14,16
75,000 91:22
8 14:5
80 134:9 147:12,15
CERTIFICATE

This is to certify that the foregoing transcript

In the matter of: National Advisory Committee on Institutional Quality & Integrity

Before: US DED

Date: 02-23-22

Place: teleconference

was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.

[Signature]
Court Reporter