

U.S. DEPARTMENT OF EDUCATION  
OFFICE OF POSTSECONDARY EDUCATION

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NATIONAL ADVISORY COMMITTEE ON  
INSTITUTIONAL QUALITY AND INTEGRITY

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WEDNESDAY  
JULY 20, 2022

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

ADVISORY COMMITTEE MEMBERS PRESENT

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

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

ASSOCIATION FOR BIBLICAL HIGHER EDUCATION,  
 COMMISSION ON ACCREDITATION (ABHE)  
 LISA BEATTY, Executive Director  
 KEVIN HESTER, Chair  
 MICHAEL JACKSON, Associate Director/Substantive  
 Change Officer  
 SHANE WOOD, Associate Director

ACCREDITATION COUNCIL FOR PHARMACY EDUCATION  
 (ACPE)  
 J. GREGORY BOYER, RPh, PhD, Associate Executive  
 Director and Director of Professional Degree  
 Program Accreditation  
 JANET P. ENGLE, PharmD, PhD (Hon), FAPhA, FCCP,  
 FNAP, Executive Director  
 REZA KARIMI, RPh, PhD, President, ACPE, Dean and  
 Professor at Pacific University School of  
 Pharmacy  
 DAWN ZAREMBSKI, PharmD, BCPS, Assistant Director  
 of Accreditation

MIDDLE STATES COMMISSION ON SECONDARY SCHOOLS  
 (MSA-CSS)  
 AUDRA CHIN, Director of Policy & Operations  
 LORNA FAIRESS, Associate Vice President  
 JAMES KRAFT, Chair  
 GLEN MORT, Vice President  
 DAN RUFO, Associate Vice President  
 CHRISTIAN TALBOT, President

AMERICAN DENTAL ASSOCIATION, COMMISSION ON DENTAL  
ACCREDITATION (ADA-CODA)

CATHRYN ALBRECHT, Senior Associate General  
Counsel

SANJAY MALLYA, Vice Chairman

SHERIN TOOKS, Director

# C-O-N-T-E-N-T-S

Welcome and Introductions . . . . . 5

Renewal of Recognition:

Association for Biblical Higher Education,

Commission on Accreditation (ABHE) . . . . .10

Renewal of Recognition:

Accreditation Council for Pharmacy Education

(ACPE) . . . . .98

Renewal of Recognition:

Middle States Commission on Secondary Schools

(MSA-CSS). . . . . 175

Renewal of Recognition:

American Dental Association, Commission on Dental

Accreditation (ADA-CODA) . . . . . 224

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

10:00 a.m.

G.A. SMITH: Good morning and welcome, everyone. This is the second day of the meeting of the National Advisory Committee on Institutional Quality and Integrity, also known as NACIQI.

I'm George Alan Smith, the Executive Director and Federal Official of NACIQI, which was established by Section 114 of the Higher Education Act of 1965, as amended, and is also governed by provisions of the Federal Advisory Committee Act, as amended, which sets forth standards for the formation and use of advisory committees.

Sections 101(c) and 487(c-4) of the HEA and Section 8016 of the Public Health Service Act, 42 USC Section 4966, require the Secretary to publish lists of state approval agencies, nationally recognized accrediting agencies, and state approval and accrediting agencies for programs of nurse education that the Secretary

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

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

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

15 In addition to these charges, NACIQI  
16 authorizes academic graduate degrees from federal  
17 agencies and institutions.

18 This authorization was provided by  
19 letter from the Office of Management and Budget  
20 in 1954 and this letter is available on the  
21 NACIQI website along with all other records  
22 related to NACIQI's deliberations.

1                   At this time, I'll turn it over to our  
2                   Chairperson, Art Keiser.

3                   CHAIR KEISER: Thank you, George.  
4                   Good morning, everyone. Welcome again to the  
5                   second day of the summer 2022 meeting of the  
6                   National Advisory Committee on Institutional  
7                   Quality and Integrity.

8                   At this time, I'd like to introduce  
9                   our members and have them introduce themselves,  
10                  and we'll start with you, Wally.

11                  W. BOSTON: Sure, Wally Boston,  
12                  President Emeritus of American Public University  
13                  System.

14                  CHAIR KEISER: Thank you. Molly?  
15                  (Native language spoken.)

16                  M. HALL-MARTIN: My name is Molly  
17                  Hall-Martin and I serve as the student member.

18                  CHAIR KEISER: Claude?

19                  VICE CHAIR PRESSNELL: Claude  
20                  Pressnell, the President of the Tennessee  
21                  Independent Colleges and Universities and Vice  
22                  Chair of the committee.

1 CHAIR KEISER: David?

2 D. EUBANKS: Good morning, everyone,  
3 Dave Eubanks. I work at Furman University.

4 CHAIR KEISER: Ronnie?

5 R. BOOTH: Ronnie Booth, President  
6 Emeritus, Tri-County Technical College in South  
7 Carolina.

8 CHAIR KEISER: Roslyn?

9 R. ARTIS: Roslyn Artis, Benedict  
10 College, Columbia, South Carolina.

11 CHAIR KEISER: Robert?

12 R. MAYES: Good morning, Robert Mayes,  
13 CEO of Columbia Southern Education Group.

14 CHAIR KEISER: Bob?

15 B. SHIREMAN: Bob Shireman with The  
16 Century Foundation.

17 CHAIR KEISER: Jill?

18 J. DERBY: Jill Derby, Senior Fellow  
19 with the Association of Governing Boards of  
20 Universities and Colleges.

21 CHAIR KEISER: Steve? You're muted,  
22 Steve.



1                   S. VAN AUDSLE: Sorry. Steve Van  
2                   Ausdle, President Emeritus, Walla Walla Community  
3                   College in Washington State.

4                   CHAIR KEISER: Zakiya?

5                   Z. SMITH ELLIS: Zakiya Smith Ellis,  
6                   former Chief Policy Advisory to Governor Murphy  
7                   in New Jersey and student advocate.

8                   CHAIR KEISER: And Jennifer?

9                   J. BLUM: Jennifer Blum with Blum  
10                  Higher Education Advising.

11                  CHAIR KEISER: Well, thank you and  
12                  appreciate everyone for being here. We are going  
13                  to go through the process of how we go through an  
14                  agency renewal and then we have three agencies so  
15                  far on the agenda and we may have a fourth.

16                  So, the standard review procedures  
17                  start with the primary readers who are assigned  
18                  to introduce the agency's application. The  
19                  department staff then provides us with a  
20                  briefing.

21                  The agency representatives are then  
22                  invited to provide comments on their petition,

1 then questions by NACIQI, followed by response  
2 and comments from the agency. If we have third-  
3 party commenters, we will then address those at  
4 that time.

5 Then the agency has the opportunity to  
6 respond to the third-party commenters, and then  
7 the department staff responds both to the agency  
8 and to the third-party commenters, and then the  
9 committee has discussion and then a vote.

10 At this time, we will begin the  
11 renewal of recognition for the Association for  
12 Biblical Higher Education, their Commission on  
13 Accreditation, ABHE.

14 Our primary readers are Molly Hall-  
15 Martin and Robert Mayes. The department staff is  
16 Nicole Harris. Molly and Robert, the floor is  
17 yours.

18 M. HALL-MARTIN: Good morning. The  
19 Commission on Accreditation of the Association  
20 for Biblical Higher Education accredits Bible  
21 colleges and institutions offering undergraduate  
22 and graduate programs through both campus-based

1 instruction and distance education.

2 The agency is an institutional  
3 accreditor and has 113 accredited and 13 pre-  
4 accredited institutions located in the United  
5 States and territories, along with accrediting  
6 activities outside of its scope of recognition to  
7 institutions in Canada.

8 The Commission on Accreditation has  
9 been recognized by the Department of Education  
10 since 1952, and its last renewal for recognition  
11 was in 2017.

12 Since the agency's last review, the  
13 department has received no complaints and one  
14 third-party comment.

15 CHAIR KEISER: Thank you. I was  
16 remiss in not having the staff introduce  
17 themselves. I will do that after we go through  
18 this agency. Nicole, you are up. You're muted,  
19 Nicole. Nicole, you're muted. You are still  
20 muted.

21 N. HARRIS: Can you hear me now?

22 CHAIR KEISER: We can now.

1                   N. HARRIS: Okay, great, sorry for the  
2 delay. Good morning, everyone, excuse me, Mr.  
3 Chair and members of the committee. My name is  
4 Dr. Nicole S. Harris and will be presenting  
5 information regarding the renewal petition  
6 submitted by the Association for Biblical Higher  
7 Education, also referred to as ABHE or the  
8 agency, a Title IV institutional accreditor  
9 currently recognized by the department.

10                   The department staff recommendation to  
11 the senior department official is to renew the  
12 agency's recognition for five years with the  
13 inclusion of an expansion of scope for offering  
14 via, I'm sorry, direct assessment within the  
15 agency's scope of recognition.

16                   The department staff recommendation is  
17 based upon my review of the agency's renewal  
18 petition, supporting documentation, and virtual  
19 observations of the commission and annual  
20 meetings in February 2021 and 2022, a training  
21 workshop in September 2021, and evaluation site  
22 visits in October 2021 and April 2022, along with

1 a file review conducted in March and April of  
2 2022 for the agency.

3 Based upon the above-mentioned review  
4 of the agency's original submission and draft  
5 staff analysis responses, supporting  
6 documentation, observations, and follow-up  
7 communication with the agency, department staff  
8 has determined the agency meets the requirements  
9 of the Secretary's criteria for recognition with  
10 no remaining issues.

11 It should also be noted that the  
12 agency has provided a request for an expansion of  
13 scope for the inclusion of direct assessment  
14 within the agency's scope of recognition as  
15 previously stated above. Although not reflected  
16 in the scope of recognition within the final  
17 staff analysis, this request is reflected in  
18 602.16(d) of the petition.

19 Thus, the agency's scope of  
20 recognition would read the accreditation and pre-  
21 accreditation candidate status of institutions of  
22 biblical higher education offering undergraduate

1 certificates, associate degrees, bachelor  
2 degrees, graduate certificates, and master's  
3 degrees, including the accreditation of  
4 educational programs offered via distance  
5 education and direct assessment.

6 This concludes my presentation. There  
7 are agency representatives present today and they  
8 will be happy to respond to the committee's  
9 questions. Thank you.

10 CHAIR KEISER: Are there any questions  
11 for Ms. Harris, Nicole Harris? If not, I'd like  
12 to introduce Dr. Lisa Beatty, the Executive  
13 Director of the ABHE Commission on Accreditation,  
14 and if you would, please introduce the members of  
15 your team. You are muted. Thank you.

16 L. BEATTY: Thank you. Thank you very  
17 much. Good morning, Mr. Chair and members of the  
18 committee. We would like to thank you for this  
19 opportunity to speak on behalf of the Association  
20 for Biblical Higher Education or ABHE.

21 My name is Lisa Beatty and I serve as  
22 the Executive Director of the ABHE Commission on

1 Accreditation. Prior to my service with ABHE, I  
2 was an educator and academic vice president at an  
3 ABHE accredited college for 29 years, served one  
4 term on the ABHE commission with two years as  
5 chair, and my dissertation research focused on  
6 institutional outcomes of accreditation  
7 processes.

8 With me today is Dr. Kevin Hester,  
9 Chair of the ABHE Commission on Accreditation,  
10 and Vice President for Institutional  
11 Effectiveness and Dean of the School of Theology  
12 at Welch College, Gallatin, Tennessee. Dr.  
13 Hester has served on the commission for seven  
14 years and this is his third year as chair.

15 Also joining me are two members of the  
16 commission professional staff. Dr. Shane Wood  
17 serves as Senior Associate Director and has been  
18 at the commission for seven years.

19 Dr. Michael Jackson is the Associate  
20 Director and Substantive Change Officer for the  
21 Commission. Dr. Jackson served in a part-time  
22 role for the past four years and has recently

1 joined us as full-time professional staff.

2 Both gentlemen have extensive prior  
3 experience serving in leadership roles at ABHE-  
4 accredited institutions.

5 We would like to express our sincere  
6 appreciation to the department and particularly  
7 to Dr. Nicole Harris for her support and  
8 assistance throughout the review process.

9 As was noted yesterday, we were  
10 looking at a new set of regulations, and so there  
11 are some inherent challenges in that, but Dr.  
12 Harris' knowledge of the regulations, her careful  
13 review of our petition and supporting  
14 documentation, and particularly her availability  
15 when questions arose provide invaluable during  
16 this process.

17 I would also like to acknowledge the  
18 excellent work of Dr. Ron Kroll, the previous  
19 commission director, in preparation of our  
20 original petition.

21 This year, ABHE celebrated its 75th  
22 anniversary. In 1952, just five years after its



1 founding, ABHE was recognized by the Department  
2 of Education. So, we have a long history of  
3 ensuring quality and integrity in biblical higher  
4 education through accreditation processes  
5 empowered by peer review.

6 ABHE commission standards and policies  
7 are focused on ensuring and advancing quality in  
8 those institutions accredited and pre-accredited  
9 by the agency.

10 The credentials and accumulated  
11 experience of the commission professional staff  
12 provides our institutions with a wealth of  
13 knowledge and expertise in accreditation and  
14 institutional improvement processes.

15 Our accreditation approach requires a  
16 great deal of face to face engagement with  
17 institutions. Between annual staff visits for  
18 applicants and candidate institutions, additional  
19 location visits, assessment visits, and staff  
20 support for evaluation team visits, the agency  
21 averaged more than 50 on-campus staff visits  
22 annually during the recognition period.

1                   Our pool of 200 team evaluators  
2           complete extensive training on ABHE standards and  
3           policies with the expectation of updated training  
4           at least once every three years.

5                   The agency is currently developing a  
6           new evaluator training course hosted by CampusEdu  
7           designed to increase engagement and provide just  
8           in time updates. Commission staff also provided  
9           training at the February commission meeting and  
10          at other meetings as needed.

11                  I'm extremely proud of the work of our  
12          commission. We have an experienced team of 18  
13          volunteer commissions, 15 institutional members  
14          elected by the delegate assembly, and three  
15          public members appointed by the executive  
16          committee of the commission.

17                  Members include institution  
18          presidents, academic leaders, CFOs, and  
19          institutional effectiveness, learning resource,  
20          and student services professionals. Public  
21          members currently include a CPA, a leader of a  
22          parachurch ministry, and a student member.

1                   Commissioners complete training on all  
2 standards and policies prior to service. They  
3 are careful readers and questioners, and  
4 deliberate and consistent decision makers.

5                   Team evaluators and commissioners sign  
6 the agency's conflict of interest policy annually  
7 and take great care to recuse themselves from  
8 serving on a team or making a decision regarding  
9 an institution with which they may have a  
10 conflict.

11                   In this introduction, we would like to  
12 provide the information regarding performance  
13 data, decision activities, student achievements,  
14 and institutional quality, and please excuse me  
15 if I need to take a drink. My voice is a little  
16 rocky. I'm recovering from COVID. So, if I need  
17 to take a drink, that's the reason why.

18                   The ABHE Commission on Accreditation  
19 is a specialized institutional accreditor of  
20 colleges and universities that require a core of  
21 biblical and theological studies and practical  
22 field-based ministry formation for all students

1       regardless of academic program.

2               The agency accredits or pre-accredits  
3       111 U.S. institutions in 36 states and U.S.  
4       territory, and 17 institutions in six Canadian  
5       provinces. Annualized head count for these  
6       institutions is approximately 40,000 students.

7               ABHE accredited and pre-accredited  
8       institutions include a significant number of  
9       minority-serving institutions, including three  
10      HBCUs and three Native American-serving  
11      institutions. We are proud that our institutions  
12      provide educational opportunities for many  
13      underserved student populations.

14              The accreditor dashboard presents data  
15      on institutions for which ABHE is the Title IV  
16      gatekeeper, a total of 53 institutions serving  
17      6,747 undergraduates and 1,158 graduate students,  
18      for a total of 7,905 students or about 20 percent  
19      of total students attending the 128 ABHE  
20      accredited or pre-accredited institutions. These  
21      53 institutions constitute just over 40 percent  
22      of institutions accredited or pre-accredited by

1 ABHE.

2 Dashboard data for the 53 institutions  
3 for which ABHE is the Title IV gatekeeper  
4 indicates that 54 percent of ABHE undergraduates  
5 at these institutions receive Pell and 32 percent  
6 receive federal student loans.

7 ABHE's aggregate Title IV volume is  
8 \$42 million, with an average per campus volume of  
9 less than \$1 million per institution. Average  
10 net price for these institutions, these 53  
11 institutions is below \$15,000.

12 ABHE institutions serve a high  
13 percentage of part-time students, transfer  
14 students, and adult learners, leading to small  
15 graduation cohorts of first-time full-time  
16 students. The cohort size for graduation rate in  
17 the current dashboard dataset is just 601  
18 students.

19 This small cohort is due to the nature  
20 of ministry programs, which often serve as a  
21 second career rather than a first, and these  
22 part-time adult learners often take more than 150

1 percent of program length to complete.

2 The dashboard reflects graduation  
3 rates for 2020-2021 which will join 2019-20 as an  
4 asterisk year due to the pandemic.

5 That said, the institutions with 150  
6 percent graduate rates below 33 percent on the  
7 accreditation dashboard include an institution on  
8 heightened cash monitoring, an institution placed  
9 on warning by the commission in February 2022,  
10 and five institutions with graduation rate  
11 cohorts of four or fewer students.

12 Ten of these institutions saw  
13 improvements in graduation rates in the most  
14 recent reporting year, with eight now above the  
15 dashboard's 33 percent threshold. The average  
16 graduation transfer out rate for all ABHE  
17 accredited institutions in 2021 was 60.8 percent.

18 The commission monitors financial  
19 responsibility composite scores as part of the  
20 annual report process. The accreditor data file  
21 indicates that two institutions scored below 1.0  
22 for the reporting period. The first improved its

1 FRCS to 1.2 in 2020 and 1.7 in 2021, and the  
2 second improved its FRCS to 1.1 in 2020 and 1.5  
3 in 2021.

4 Overall, the average FRCS score for  
5 ABHE accredited and pre-accredited institutions  
6 improved by more than 0.3 from 2020 to 2021 to  
7 approximately an average of 2.5 for FRCS scores  
8 across our accredited and pre-accredited  
9 institutions.

10 Now, I turn to decision activity.  
11 Since the agency's 2017 appearance before NACIQI,  
12 ABHE has granted pre-accredited status or  
13 candidate status to 17 institutions, granted  
14 initial accreditation to 18 institutions,  
15 reaffirmed the accreditation of 51 institutions,  
16 placed three institutions on probation, removed  
17 one institution from probation, continued two  
18 institutions on probation for a second year,  
19 issued show-cause orders to two institutions,  
20 removed accredited status from one institution,  
21 pre-accredited status from one institution, and  
22 applicant status from one institution, and

1 approved 241 substantive changes. The agency  
2 averages approximately 300 accreditation actions  
3 each year.

4 Commission assessment processes have  
5 identified two standards most referenced in  
6 action letters for needed improvement at ABHE  
7 institutions, standard 6b financial resources and  
8 standard 2 assessment planning.

9 As an accreditor of small faith-based  
10 private institutions that rely heavily on  
11 supporting churches and individuals rather than  
12 high tuition revenues, we work with institutions  
13 that have never experienced financial abundance,  
14 but manage to thrive on very modest resources,  
15 some now into a second century.

16 When an institution's data during the  
17 recognition period fell below the 1.5 monitoring  
18 threshold or an evaluation team identified a  
19 concern in the area of financial resources, the  
20 commission has taken the following range of  
21 actions during the commission recognition period,  
22 required progress reports, including the



1 development of a detailed financial recovery  
2 plan, required updates regarding financial  
3 recovery plan implementation, required staff  
4 visits to review financial conditions, required  
5 institutional representatives to appear before  
6 the commission to discuss financial position,  
7 deferred action on reinstatement, deferred action  
8 on candidate status, deferred action on  
9 reaffirmation of accreditation, placed  
10 institutions on warning, on probation, on show  
11 cause, and withdrew accredited status.

12 So, the commission is very diligent in  
13 helping institutions as they work through issues  
14 related to financial resources.

15 We also provide significant training  
16 and coaching opportunities to assist institutions  
17 in addressing issues of financial resources and  
18 institutional improvement in that area.

19 These include a series of leadership  
20 development conferences each fall for presidents,  
21 enrollment leaders, advancement leaders, and  
22 financial officers. In fall 2021, attendance at

1 just those four conferences totaled 91  
2 individuals from 51 different institutions.

3 ABHE also provides financial training  
4 through pre-conference forums and workshop tracks  
5 for CFOs, advancement and enrollment  
6 professionals at its February annual meeting.

7 Through attendance at fall conferences  
8 and annual meeting workshop tracks, institutional  
9 leaders can achieve certification through ABHE's  
10 executive training and certification programs.

11 Support for financial stability is  
12 also provided through the excellence in board  
13 governance training program funded through a  
14 grant from the Murdock Charitable Trust.

15 In the past three years, board cohorts  
16 from 28 ABHE accredited and pre-accredited  
17 institutions have completed this comprehensive  
18 board training.

19 Now, with regard to standard two  
20 assessment and planning, when the commission has  
21 identified weakness in compliance, the commission  
22 has taken a similar range of actions during the

1 recognition period, everything from progress  
2 reports through placing institutions on  
3 sanctions, sending staff visits to address issues  
4 of assessment, requiring focused evaluation  
5 visits, deferring substantive change.

6 In some cases, the commission has  
7 required institutions with assessment issues to  
8 host a staff visit to provide specific guidance  
9 on assessment.

10 This approach fosters a sense of  
11 support and encouragement for the institution and  
12 has been found to resolve concerns more quickly  
13 than requiring a progress report without this  
14 advisory assistance.

15 To assist institutions in quality  
16 improvement with regard to standard two,  
17 particularly student achievement assessment and  
18 outcome validation, ABHE presents annual meeting  
19 workshops focused on best practices for  
20 assessment.

21 Each fall, the accreditation journey  
22 conference includes a unit on developing and

1 implementing assessment plans, and for the first  
2 time in fall 2021, ABHE offered a two-day  
3 institutional assessment conference with 48  
4 attendees. The conference will be offered again  
5 this fall.

6 Annual staff consultation visits to  
7 applicants and pre-accredited institutions focus  
8 heavily on development of a comprehensive  
9 assessment plan which is a prerequisite for  
10 hosting an evaluation team for pre-accredited  
11 status.

12 Let me say a few words about student  
13 achievement. Informed by ABHE accreditation  
14 standards one, mission and goals, and two,  
15 assessment and planning, student achievement is  
16 directly linked to mission fulfillment.

17 Some of our institutions focus on  
18 preparation for professional ministry careers,  
19 while others focus on lay ministry, avocation, or  
20 life service, sometimes with a second career  
21 preparation area.

22 Whether explicit or implicit in the

1 mission, all biblical higher education  
2 institutions regard achievement in foundational  
3 Bible knowledge and acquisition of ministry  
4 service skills. They make that a mission  
5 objective even if transfer out is the path to  
6 career fulfillment.

7           This diversity of mission means that  
8 evaluation teams and the commission must honor  
9 mission as paramount and exercise appropriate  
10 flexibility in reviewing student outcomes in the  
11 context of mission.

12           The ABHE Commission on Accreditation  
13 places high emphasis on achievement of outcomes  
14 related to mission. The policy on outcomes  
15 provides guidance to institutions concerning  
16 commission review of institution and program  
17 outcomes, and communication of outcomes to the  
18 public in a meaningful and consumer friendly  
19 fashion.

20           Institutions are required to publish  
21 institutional goals and program objectives and  
22 the resulting outcomes. Evaluation teams

1 evaluate institutional effectiveness based on  
2 outcomes date demonstrating mission achievement.

3 Over the past two years, the agency  
4 has engaged in a comprehensive review of  
5 institutional compliance with standard two and  
6 the policy on outcomes.

7 At the conclusion of the project  
8 anticipated by November 2022, the agency will  
9 have reviewed outcomes information available to  
10 the public using a standardized rubric, either as  
11 part of a scheduled evaluation team visit or  
12 through staff review and reporting for all ABHE  
13 accredited institutions.

14 Evaluation team reports and staff  
15 website outcomes reports are placed on the  
16 commission agenda for review at the next  
17 scheduled meeting.

18 Institutions with identified areas of  
19 noncompliance are required to submit progress  
20 reports demonstrating with evidence that  
21 assessment-related issues have been addressed.

22 Turning to institutional quality, the

1 ABHE's commission, I'm sorry, the ABHE  
2 commission's definition of quality is  
3 communicated through the policy on academic  
4 quality as related to institutional mission.  
5 Because institutional missions within ABHE vary,  
6 the definition of quality must accommodate this  
7 mission diversity.

8 The policy articulates four specific  
9 qualities an institution must have to fulfill and  
10 sustain an improved academic quality. The first  
11 is student learning outcomes are defined and are  
12 being achieved. Educational programs, student  
13 learning experiences, and support services meet  
14 the needs of the student population served and  
15 result in student success.

16 Third, students engage with qualified  
17 faculty in the learning experience, and fourth,  
18 the institution procures and manages resources  
19 necessary to fulfill its mission and sustain its  
20 educational programs.

21 The commission monitors these  
22 indicators using data collected through the

1 annual report process, including enrollment,  
2 retention rates, graduation rates, financial  
3 responsibility composite score, faculty  
4 credentials, and financial indicators.

5 If an indicator is tripped, the  
6 institution is required to provide an explanation  
7 for review by commission subcommittee at its next  
8 scheduled meeting. If the explanation is not  
9 acceptable, a progress report or action plan is  
10 required.

11 The merit of asking for an explanation  
12 as a first step has proved invaluable in  
13 identifying data errors or extenuating  
14 circumstances before assuming weakness.

15 To achieve accredited status with  
16 ABHE, institutions must demonstrate substantial  
17 compliance with 25 conditions of eligibility and  
18 11 standards and related essential elements.

19 When an evaluation visit or  
20 substantive change petition surfaces a weakness  
21 for an accredited institution, the commission  
22 asks for a progress report to address the issues.



1           A focused visit or staff visit may be  
2 required as well, and where compliance with  
3 standards is found to be deficient, sanctions are  
4 applied.

5           The commission treats all applicant  
6 and pre-accredited institutions as potentially at  
7 risk and requires an annual staff visit and  
8 progress report to monitor and/or assist these  
9 institutions towards substantial compliance.

10           In February 2022, the commission  
11 approved a change in policy requiring applicant  
12 and pre-accredited institutions to complete a  
13 standard self-assessment prior to annual visits.

14           This tool requires institutions to  
15 self-assess their progress in achieving  
16 compliance with the standards and essential  
17 elements on a five point scale and accompanying  
18 narrative, and thus focuses staff attention on  
19 specific areas needed for institutional  
20 development.

21           As noted in my earlier comments, ABHE  
22 provides extensive continuing education

1 opportunities that support institutional quality  
2 improvement, including leadership annual  
3 conferences, an annual meeting and webinars, fall  
4 conferences not mentioned above include  
5 conferences for academic and student development  
6 leaders, online education, Title IX, and  
7 achieving accreditation standards.

8           The achieving accreditation standards  
9 conference assists institutions in documenting  
10 compliance with standards and improving their  
11 programs.

12           The conference provides an overview of  
13 all 11 institutional accreditation standards and  
14 related essential elements, and provides examples  
15 of appropriate evidence for each essential  
16 element.

17           And then as it relates to agency  
18 effectiveness, the ABHE Commission on  
19 Accreditation is currently engaged in a  
20 comprehensive review of standards. The review  
21 was launched in February 2022 with a listening  
22 session at the annual meeting. We followed up

1 with three virtual listening sessions and a  
2 survey sent to all accredited and pre-accredited  
3 institutions.

4 Thus far, our institutions indicate  
5 that the current standards are valued and that  
6 work should focus on updates related to the  
7 changing higher education environment such as  
8 instructional modalities, technological  
9 resources, diversity, and innovation.

10 In 2022, the commission made a  
11 substantial investment in a software platform to  
12 assist in data collection and reporting to ensure  
13 the quality of data collected and encourage  
14 meaningful data engagement, and in addition, the  
15 agency is currently developing a comprehensive  
16 assessment plan to evaluate its own  
17 effectiveness.

18 In conclusion, I want to assure the  
19 committee that the ABHE Commission on  
20 Accreditation has taken the recognition review  
21 process very seriously.

22 The agency's review in light of the

1 new regulations resulted in policy changes,  
2 process improvements, and reflective questions  
3 about how best to assure the public of  
4 institutional and program quality at ABHE  
5 accredited institutions.

6 We are gratified by the department  
7 recommendation for renewal of recognition for  
8 five years with the addition of direct assessment  
9 in our scope of recognition.

10 This concludes our remarks, and once  
11 again, on behalf of the Association for Biblical  
12 Higher Education Commission on Accreditation and  
13 staff, we would like to thank the department and  
14 the committee for the opportunity to present  
15 additional information in support of our petition  
16 of recognition. We would be happy to answer any  
17 questions you may have.

18 CHAIR KEISER: Okay, Molly, Robert, do  
19 you have questions for the agency?

20 R. MAYES: Molly, do you want to go  
21 ahead?

22 M. HALL-MARTIN: Well, my first

1 question was fortunately answered within the  
2 presentation. I was going to ask about how the  
3 comprehensive standard review process has been  
4 going, but you shared an update there.

5 I think the one remaining question I  
6 have is could you -- you have an institution that  
7 for better or for worse has made a couple of  
8 headlines of late and I'm wondering if you could  
9 speak to the situation at Olivet and any actions  
10 you took as an accreditor to ensure institutional  
11 integrity?

12 L. BEATTY: Thank you very much for  
13 that question. Even this last week, we have seen  
14 some media reports regarding Olivet.

15 Let me first start by saying that  
16 standard three of the ABHE standards and  
17 essential elements relates specifically to  
18 institutional integrity, and so this is an area  
19 that is very important as a standard at ABHE.

20 The issues related to Olivet  
21 University, and you'll understand that I'm  
22 following policies on confidentiality that

1 relates to ABHE and also to the department's  
2 policies, but I will share what we have done that  
3 is public at this point as it relates to this  
4 particular institution.

5 So, there were some issues that  
6 emerged related to Olivet in 2019, and commission  
7 review of that situation led to the commission  
8 placing the institution on probation status in  
9 February 2020.

10 The institution continued to make  
11 progress on those issues, but the commission did  
12 not feel that sufficient progress had been made  
13 by February 2021, and so the institution was  
14 continued on probation in February 2021. Those  
15 action letters and the reasons for the sanctions  
16 were posted, are still posted on the ABHE  
17 website.

18 In 2021, following the February  
19 meeting, so that fall, the institution hosted a  
20 focused visit, and so there was on the ground  
21 scrutiny of the information related to the  
22 probation status, and based on that visit and the

1 resulting report, the institution was removed  
2 from November, or, I'm sorry, removed from  
3 probation status in November of 2021.

4 Since that time, there have been  
5 really two precipitating events that put the  
6 institution back on the agency's radar. One was  
7 a news report, a media report in April of 2022.

8 The second was a letter from the State  
9 of New York that indicated that the state was not  
10 renewing approval for the institution to operate  
11 in the state, and those two items came to ABHE  
12 actually on the same day.

13 And based on that information, we  
14 treat all media reports like an anonymous  
15 complaint, though we required the institution to  
16 provide a response to the media report and to the  
17 findings and observations of the letter from New  
18 York State.

19 That happened in May of this year, so  
20 you can tell that the timeline here has been  
21 tight. We have a meeting in June 2022. So, all  
22 complaints and responses are placed on the agenda

1 for review at the next meeting. So, that review  
2 took place in June 2022 of the institution.

3 The commission has initiated an action  
4 regarding the institution, but that action is  
5 currently in our due process process at this  
6 point. It is not final, and so that action is  
7 not public at this point.

8 M. HALL-MARTIN: Thank you. That's  
9 all of my questions. Robert, did you have any?

10 R. MAYES: Sure. Your website and  
11 your documentation definitely shows you take  
12 actions when appropriate.

13 And I was just wondering also about  
14 higher education has seen a downturn in  
15 enrollment that has affected different sectors  
16 differently over the last couple of years or  
17 more, and of course, that's going to hit on your  
18 financial standards. I'm just wondering how has  
19 that been with your institutions and how have you  
20 dealt with that?

21 L. BEATTY: Thank you. That's a great  
22 question which we appreciate. I think I



1 mentioned in the introduction that over the last  
2 two years, we have actually seen some -- we have  
3 seen institutions overall see their FRCS scores  
4 improve.

5 We don't know yet. We're looking at  
6 various data points, but we suspect that HEERF  
7 funds and CARES Act funds have provided some  
8 support for our institutions. Remember, these  
9 are small institutions.

10 If you do the math, for the 53  
11 institutions that are on the dashboard and divide  
12 out what the FTE is likely for those  
13 institutions, they average less than 200  
14 students, so funds from the federal government  
15 for HEERF and CARES did have a position impact  
16 for some of those small institutions.

17 That said, we have not seen any sort  
18 of deep decrease in enrollment. So, there have  
19 been some decreases in enrollment over time, but  
20 that has not been characteristic of many of our  
21 institutions.

22 Many of them have been able to sort of

1 hold steady and some of that is because small  
2 institutions can be nimble, and so they can make  
3 changes related to delivery in ways that can  
4 accommodate students.

5 And we've seen some creative  
6 approaches, both through the pandemic based on  
7 the flexibility provided by the department, and  
8 then even after based on substantive change  
9 requests to continue what they were doing as part  
10 of their measures during the COVID period.

11 So, I would say that our institutions  
12 do not have deep pockets. That would be, I  
13 think, unexpected for ministry-oriented  
14 institutions, but I think that the mission of  
15 these institutions is often supported, strongly  
16 supported by churches and denominations, and that  
17 has been a help for our institutions during this  
18 time. Kevin or Shane, would you have anything to  
19 add to that? Okay.

20 R. MAYES: Thank you for your answer  
21 and also thank you for your mission and what you  
22 do. I greatly admire it and appreciate it. All

1 right, that's all for me. We can't hear you,  
2 Art.

3 CHAIR KEISER: I wanted to make sure  
4 there's no external sounds coming in, so I was on  
5 mute, but we have Wally, then Michael, then Mary  
6 Ellen, and then Jennifer. Wally?

7 W. BOSTON: Yes, thank you. So, I'd  
8 like to commend you, Dr. Beatty, for such a great  
9 presentation, particularly as you took the time  
10 to explain numbers on our most recently published  
11 dashboard.

12 As you know, the dashboard was  
13 suspended for a couple of years and then  
14 reinstituted with the new administration, and  
15 we're looking at that in many different ways, and  
16 so my questions do revolve around some items on  
17 the dashboard that I feel like you've done a  
18 great job of explaining.

19 It's not a surprise, based on your  
20 mission, that the median earnings are rather low  
21 for the institutions, and I guess it was a  
22 surprise, a pleasant surprise, I guess, that only

1       20 percent of your total student enrollment for  
2       the institutions are surfacing on this report  
3       because there are a small percentage of people  
4       who are participating in federal aid.

5               But I do have a question about the  
6       graduation rate and the transfer rate,  
7       particularly as you look at it as an accrediting  
8       agency. It's rather high compared to the  
9       averages for four-year institutions.

10              And you mentioned that you have  
11       certain indicators on your annual report that are  
12       triggers, and I'm wondering if one of them  
13       relates to graduation rates and how you all view  
14       that given the fact that you've cited a 60.8  
15       percent transfer rate and didn't necessarily  
16       indicate that that was bad, so --

17              L. BEATTY: So, that's a great  
18       question. Let me just make one clarification  
19       about the dashboard which is fairly unique to an  
20       agency like ABHE.

21              We do have another 25 institutions.  
22       Now, let me make sure I have that number right,

1 another 36 accredited institutions that  
2 participate in Title IV, but they participate  
3 through another gatekeeper.

4 And then we have 39 institutions that  
5 do not participate in Title IV, including all of  
6 our pre-accredited institutions. So, we don't  
7 have any of our candidate institutions that are  
8 currently participating in Title IV.

9 Sometimes I think that is sort of  
10 lost. It's just that we have some institutions  
11 with dual accreditation, so even though they  
12 participate in Title IV, they're counted on  
13 somebody else's dashboard, so I just wanted to  
14 make sure that that was clear.

15 W. BOSTON: Okay.

16 L. BEATTY: We do, in fact, have  
17 graduation -- what we collect on our dashboard,  
18 and I don't want to confuse by using the term  
19 dashboard, but on our annual report indicators is  
20 graduation/transfer rate, so a combined  
21 graduation/transfer rate, and that is the metric  
22 that I gave you, Dr. Boston, at 60.8 percent for

1       accredited institutions.

2                   And for ABHE, what that indicates is  
3       we certainly have some first-time full-time  
4       students. You saw that the number for the  
5       dashboard was 601. That's a very small end.

6                   So, but we certainly do have students  
7       that come to our institutions intending to  
8       complete a program, but we also have students  
9       that come to do a one-year certificate or they  
10      come to do a component, an academic component  
11      that they intend to transfer elsewhere in order  
12      to pursue a degree program that's not offered at  
13      an ABHE institution.

14                  And while we have more institutions  
15      over time that are offering programs like  
16      business, and IT, and counseling, and graphic  
17      design just to name a few, we do have many  
18      institutions, particularly the ones on the  
19      dashboard, that are really focused on Bible and  
20      ministry programs.

21                  So, for ABHE, as we are tracking that,  
22      our view is that the combined graduation/transfer

1 rate gives us a much clearer picture of that  
2 outcome at our ABHE institutions. Did I answer  
3 your question, Dr. Boston?

4 W. BOSTON: Yes, in other words, the  
5 data that comes from the college scorecard,  
6 particularly since it only represents first-time  
7 full-time students for certain aspects like  
8 graduation rates, is difficult to evaluate when  
9 you have a large part-time population and a large  
10 percentage of people doing certificates.

11 So, we have a separate project that's  
12 under discussion and will be discussed on Friday  
13 under the current calendar, but I certainly  
14 appreciate the thoroughness that you've done in  
15 reviewing this, and it sounds like it's most  
16 appropriate to look at graduation plus transfer,  
17 which is what you have on your indicators, so  
18 thank you for your explanation.

19 L. BEATTY: Yeah, I would just follow  
20 up and say we also are continuing to try to think  
21 through how best for our institutions to be able  
22 to provide data that is most meaningful to them,

1 and so this is an ongoing conversation at the  
2 commission level as well, so thank you. I'm glad  
3 to hear NACIQI is discussing it.

4 W. BOSTON: Thanks.

5 CHAIR KEISER: Michael?

6 M. LINDSAY: Hi, Dr. Beatty. I'm  
7 Michael Lindsay. I serve as the President of  
8 Taylor University in Indiana, a faith-based  
9 institution, and so I've been familiar with ABHE  
10 for many years.

11 I was curious. I know that the faith-  
12 based sector has been very involved with both  
13 international student education and with first  
14 generation students more so than other sectors of  
15 higher ed, and I was curious.

16 I don't know what your institutions  
17 experience, but in my part of the sector with  
18 some of the Visa regulations that changed in  
19 2016-2017, so many international students that  
20 used to come and study at American institutions  
21 were no longer able to do that.

22 Then the pandemic hit, and then you



1 have such full employment now that many students  
2 who would normally be considering going into  
3 higher education are maybe staying in the  
4 workforce.

5 I was just curious how your  
6 institutions were fairing with these three  
7 different things that have happened in the last  
8 five to six years and how that might be affecting  
9 some of your standards as it relates to  
10 recruitment enrollment, and then, of course, that  
11 also affects finances as well.

12 L. BEATTY: Right, thank you. Those  
13 are all issues that I think the higher education  
14 sector as a whole are experiencing, but let me  
15 start with the issue of international students.  
16 I think that our experience in our institutions  
17 would be typical of the experience that you're  
18 describing, Dr. Lindsay.

19 I think the institutions are  
20 struggling with -- so they have students in other  
21 countries who are ready to come to institutions  
22 and are just not able to get either a Visa

1 interview or get approval to come, and so I think  
2 there is actually quite a backlog for some  
3 institutions of students who would be here if  
4 they were able to get a Visa.

5 As it relates to the pandemic itself,  
6 I mentioned earlier that I think ABHE  
7 institutions have done a really amazing job of  
8 addressing the quick change like many other  
9 sectors. It was during our spring break that  
10 institutions had to make a decision about whether  
11 or not they could make a quick change to distance  
12 learning and they made those changes.

13 I think ABHE institutions have good  
14 experience with distance learning. It's been  
15 part of our recognition since 2007, so many of  
16 our institutions were already engaged in distance  
17 learning, but I think all of us have had a great  
18 deal to learn about ways to leverage those  
19 instructional modalities over this period of  
20 time.

21 I do think that there are students  
22 that we've been able to attract to our

1 institutions because of the flexibility of  
2 delivery that were perhaps not able to attend  
3 residential Bible institutes or colleges prior to  
4 that time, though I think there has been a  
5 continuing interest in the residential experience  
6 of life transformation as part of the process of  
7 education.

8 That is not to say that both of those  
9 aspects have not had downward pressure on  
10 enrollment at our institutions. I just think it  
11 has been rather measured and we have seen some  
12 bounce back as it relates to that.

13 As far as our standards are concerned  
14 -- and if I'm missed something here, my  
15 apologies. We can go back, but as far as changes  
16 to standards, you know, our conversations with  
17 our constituents as it relates to our standards  
18 review, some of these issues like technological  
19 resources, as we look at our standards, we think  
20 there is work to do to improve our standards and  
21 essential elements related to the technological  
22 resources that support the kind of education that

1 many of our institutions are now providing.

2 So, that would be a specific area  
3 where the commission is reviewing our current  
4 standards in light of what we have been  
5 experiencing over the last several years.

6 CHAIR KEISER: Mary Ellen? And Wally,  
7 could you put your hand down, please?

8 M. E. PETRISKO: Yeah, thank you for  
9 your presentation and bringing us up to date on a  
10 lot of the data --

11 CHAIR KEISER: Mary Ellen, you need to  
12 speak into your microphone because you kind of  
13 balance out.

14 M. E. PETRISKO: Okay, let me turn my  
15 sound up a little bit here.

16 CHAIR KEISER: Yes, it's much better  
17 when you get closer.

18 M. E. PETRISKO: Okay, I will try to  
19 speak more clearly and distinctly and louder.  
20 Thank you.

21 So, my questions are around the area  
22 of student achievement, and in particular,

1 looking at the petition and at the exhibits that  
2 accompanied the petition, there were three  
3 institutions that were provided, I believe, by  
4 the agency, and one that was the institutional  
5 materials that were requested by the department  
6 staff.

7 So, in looking specifically at the two  
8 institutions, I'll just name them Institution A  
9 and Institution B, I won't put their names in  
10 here unless you want me to do that, it appeared  
11 to me that there was not a great deal of either  
12 progress on what was anticipated in the standards  
13 --

14 One was planning for assessment on  
15 student learning, and the same for administrative  
16 work, and in the second case as well, that there  
17 was not really documentation of having planned  
18 outcomes integrated with course objectives and,  
19 you know, a whole system of assessment and  
20 getting results from that system.

21 It wasn't clear to me in the case of  
22 Institution A, which was reaffirmed for ten years

1 in spite of concerns about student achievement,  
2 how team members -- so how do your team members  
3 look at this? Although they were only planning  
4 for assessment, this institution was deemed to be  
5 moderately in compliance.

6 That's another question for me. What  
7 does minimally in compliance, moderately in  
8 compliance, and substantially in compliance mean  
9 for your team members? How are they trained to  
10 make those distinctions?

11 So, this institution was deemed  
12 moderately in compliance in spite of the fact  
13 that there was just planning and really no  
14 carrying out.

15 The letter to the institution said  
16 that the achieving of learning needed to be  
17 validated using that assessment plan and that a  
18 progress report was asked for two years out.

19 Understandably, if the assessment work  
20 hasn't been done, it has to be gathered, it has  
21 to be evaluated, and it has to be acted on, that  
22 takes some time. So, moderately compliant, yet

1 not doing this progress report and a  
2 reaffirmation for ten years. That's at  
3 institution one, I mean A.

4 Institution B, this is another case  
5 where there was a ten-year reaffirmation and the  
6 reaffirmation letter was dated in March of 2020.  
7 A progress report was asked within an eight-month  
8 period asking for the development and  
9 implementation of plans and what was happening  
10 with these plans.

11 So, only eight months was being given  
12 when it was they literally weren't at any kind of  
13 a stage with achievement of what was intended.  
14 I'll read it from the letter.

15 So, the reaffirmation for ten years  
16 until 2030 was because of the judgment of the  
17 agency that the institution was substantially  
18 compliant with your standards, and I'm quoting,  
19 including documentation of the appropriateness,  
20 rigor, and achievement of student learning  
21 outcomes.

22 Immediately thereafter, a progress

1 report is asked for documenting that  
2 comprehensive student outcomes and institutional  
3 plans have been developed and implemented with  
4 evidence that they are leading to the improvement  
5 of teaching, learning, and institutional  
6 improvement.

7 What I gather from that is that they  
8 really didn't have this developed and  
9 implemented, and yet a ten-year reaffirmation was  
10 given. A progress report is asked for within  
11 eight months. And that same institution, in the  
12 action letter, there's a note about faculty  
13 qualifications.

14 Now, this may be, as you were saying,  
15 that with data that are questionable, the  
16 institutions have an opportunity to either  
17 correct those data, you know, or work with you  
18 somehow to, you know, to get that in line.

19 The faculty qualifications noted in  
20 that action letter were that it's required that  
21 80 percent of faculty hold a master's degree for  
22 undergraduate or doctorate degree for graduate



1 work.

2 The percentage of qualified faculty  
3 that this institution had for those programs was  
4 fewer than 80 percent. It was listed as 9.4  
5 percent, so if that was a mistake, which I'm  
6 assuming and hoping it was, how would that have  
7 been addressed? What would have been -- you  
8 know, if it was still below 80 percent, what  
9 would the action have been?

10 So, my question clearly has multiple  
11 parts. How are team members trained to evaluate  
12 compliance? What does minimally, moderately and  
13 substantially compliant mean for your  
14 organizations? And how were the institutions --

15 In the three that I looked at, they  
16 were all pretty nascent in their student learning  
17 reviews and outcomes, and knowing that those have  
18 been used, and yet they did not seem to be at any  
19 kind of a stage of a warning, or probation, or --

20 I'm assuming these standards have been  
21 in place for some time. Many years ago, having  
22 plans in place was acceptable, but at this stage,

1 I think that's rather unusual, so whatever  
2 enlightenment you can give us on that, I would  
3 appreciate it. Thank you.

4 L. BEATTY: Yeah, I appreciate the  
5 question, and I would say first of all, that we  
6 have standardized the language of those motions  
7 now based on a range of motions so that  
8 substantial compliance is what is required for  
9 reaffirmation of an institution. That does not  
10 mean that an institution wouldn't have some  
11 weakness that needed to be addressed.

12 And that really speaks to the progress  
13 report required in both of those cases. The  
14 training of our evaluation team members, and I'm  
15 going to turn to Dr. Wood here in a moment,  
16 regarding just the conversation about how our  
17 evaluators are trained, how our commissioners are  
18 trained with regard to this. But the requirement  
19 is that an institution will have -- and again,  
20 let me back up, and say our policy for outcomes  
21 that I mentioned in the introduction was a new  
22 policy in November 2020.

1                   And the project that I mentioned,  
2                   where we have gone through now, and by November  
3                   of 2022, will have reviewed the outcomes  
4                   information available on institutional websites  
5                   for all of our accredited institutions goes back  
6                   to some of these questions that you're asking.  
7                   And the standardization of some of this for our  
8                   institutions.

9                   But institutions for reaffirmation  
10                  have to demonstrate substantial compliance. We  
11                  might at this point use language other than  
12                  substantial compliance only for a pre-accredited,  
13                  for an institution gaining candidate status.  
14                  Because the idea in that case is that an  
15                  institution has shown sufficient progress that  
16                  the institution is deemed that they could be  
17                  receiving initial accreditation within five  
18                  years.

19                  So, that language is not the language  
20                  that we are currently using based on the new  
21                  policy on outcomes. I'm going to turn to Dr.  
22                  Wood for just a moment, and have him talk a

1 little bit about training of our evaluators with  
2 regard to student achievement.

3 S. Wood: Yeah, and this identified  
4 one of the things that we actually identified as  
5 an agency in the training. Dr. Beatty's correct  
6 in that we have kind of standardized in the  
7 policy on outcomes what we're training the  
8 standard to when it comes not only to the  
9 assessment of their student outcomes, and the  
10 communication of that to the commission, but also  
11 how they're communicating that information to the  
12 public, and to stakeholders.

13 In our training there are -- first of  
14 all there's a walkthrough. We host an achieving  
15 accreditation standards conference for all year  
16 one applicants, and we recommend anybody who  
17 actually is not caught up with the standards of  
18 where they are currently at, that we actually  
19 walk through every standard, and essential  
20 element tied to what is involved in demonstrating  
21 substantial compliance.

22 Our evaluators are exposed to that

1 information so that they're aware, and we walk  
2 through not only what is expected, but how they  
3 demonstrate that with evidence. The minimal,  
4 marginal, moderate, it was an attempt to try to  
5 communicate hey, look this agency has nothing, or  
6 they are just in the very beginning stages to  
7 they're fully developed in this area.

8 Weak is probably the word, it was a  
9 weak attempt, but it was an attempt to try to  
10 communicate to the commission so the commission  
11 would know this is where the institution is at in  
12 the process, and in the assessment of its own  
13 outcome. Obviously with this new project we  
14 become much more involved in that. We are  
15 working on a new evaluator training system as  
16 identified in the presentation with Campus EDU.

17 One of the individuals involved in the  
18 formation of that is actually an academic  
19 evaluator, and it was actually a little bit of a  
20 self assessment of the evaluators themselves  
21 saying hey, we could use a little more guidance  
22 on how we assess the institutions in regards to

1       these areas, and how what we would communicate  
2       ultimately is the decision of the commission.

3               So, the report that is produced, every  
4       evaluation report that is now produced for the  
5       commission has the rubric that is identifying the  
6       policy of outcome. That's actually a part of the  
7       team evaluation report template, so that has to  
8       be filled out with corroborating evidence that is  
9       either pointed to, or is identified as missing.  
10      So, this commission has a pretty full picture  
11      from the team evaluators, of this is where the  
12      institution stands in this process.

13             Obviously it's an ongoing process,  
14      because it's fairly new, obviously hopefully that  
15      would be an ongoing development, but that is a  
16      process that we have been engaging, and that's  
17      how we're trying to train our evaluators  
18      increasingly upon our own self assessment, upon  
19      their own self assessment, how to improve that  
20      part of the communication with a comprehensive  
21      report about the overall institution to the  
22      commission.

1 M.E. PETRISKO: So, you're talking about  
2 what's going to come out of this project, and  
3 what will be then made public, I guess on the  
4 institution's own websites, and perhaps on your  
5 website as well. That's going above, and beyond  
6 graduation rates, default rates, retention rates.  
7 This is really about the learning outcomes that  
8 are intended by those programs, and how those  
9 outcomes are met, or not met.

10 S. Wood: Yes.

11 M.E. PETRISKO: That's the intention?

12 L. Beatty: So, the policy -- yeah,  
13 I'm sorry. So, the policy on outcomes requires  
14 that institutions publish their institutional  
15 goals, and their program objectives for every  
16 academic program that the institution offers, and  
17 then the resulting outcomes. That really was the  
18 change that came with the policy on outcomes that  
19 required more information on the institutional  
20 website than what had been previously required of  
21 standard two.

22 At the same time as the policy on

1 outcomes was updated in late 2020, the standard  
2 was also updated to clarify exactly what you are  
3 mentioning, that it is about having the plan  
4 implemented, it is that you are collecting, and  
5 analyzing data, that the data is being reported  
6 to the specific stakeholders that need that  
7 information.

8 And that data is being used to make  
9 changes, and improvements in the institution.

10 So, the policy, and outcomes, the rubric that is  
11 included now is very specific to institutions.

12 Telling institutions what it is that they need to  
13 do in order to be in compliance with -- I'm  
14 sorry, in compliance with standard two, and with  
15 the policy on outcomes.

16 M.E. PETRISKO: So, I guess my last  
17 question will be when do you anticipate having  
18 finished this project, and actually having the  
19 results of what you've learned out there for us,  
20 and others to see?

21 L. Beatty: The project should be  
22 completed in November of 2022, and so we're



1 almost through that process. It's interesting,  
2 what I was looking for in my data, and I don't  
3 have the piece of paper right in front of me, was  
4 I was going to share with you the commission  
5 actions that have already resulted from the WOR  
6 project.

7 The Website Outcomes and Review  
8 Project. So, what happened was the staff member  
9 for the institutions that did not have an  
10 evaluation visit, if an institution had an  
11 evaluation visit, it went to our regular process.  
12 But for the institutions that did not have an  
13 evaluation visit, the staff member who did the  
14 website review wrote a website outcomes review  
15 report that was then submitted to the  
16 institution, and to the commission.

17 The commission reviewed the report,  
18 and if an institution was out of compliance with  
19 the policy on outcomes, then they were asked to  
20 provide a progress report on the issues that were  
21 raised in the website outcomes review report.  
22 And I think what I would say, I don't have the

1 data in front of me, my apologies, but I believe  
2 about half of the website reviews in these last  
3 few meetings resulted in a follow up progress  
4 report with the institution.

5 Making sure that this information  
6 required of the policy is now posted on the  
7 institution's website.

8 M.E. PETRISKO: Do you anticipate --  
9 I said that was my last question, but I lied. Do  
10 you anticipate that more institutions will be  
11 facing harsher actions given the history on this,  
12 and this project, and warnings, and many progress  
13 reports on top of progress reports that finally  
14 to say no at this stage, and it's not another  
15 progress report?

16 L. Beatty: Right, and as you can see  
17 from my opening discussion, the agency definitely  
18 has used sanctions to help both alert the public,  
19 and alert the institution that they are out of  
20 compliance. And so as you say, this project has  
21 allowed us to get in a short period of time,  
22 instead of over a ten year period of evaluations,

1       it has given us the opportunity to see how our  
2       institutions are -- their compliance with this  
3       particular standard.

4               And so, I think that data will be very  
5       helpful to the commission in looking at the range  
6       of actions taken with regard to both the student  
7       achievement side, and as I mentioned earlier, the  
8       other area where institutions can sometimes  
9       struggle in financial resources. So, our  
10      intention, I didn't mention this in our opening,  
11      because it was already 25 minutes long, my  
12      apologies.

13              But our June meeting is focused very  
14      specifically on assessment data from our  
15      institutions that we use to assess our own  
16      effectiveness as an agency. And so this is data  
17      that will be part of those conversations.

18              M.E. PETRISKO: Thank you very much.

19              CHAIR KEISER: Thank you. Jennifer?

20              J. BLUM: Sorry, it took me a second  
21      to get off mute. So, I wanted to go back to  
22      Molly's question about the one institution, or

1 the institution that had the recent state action.  
2 Have you required a teach out plan, and, or  
3 agreement for that institution?

4 L. Beatty: Yes, thank you. I should  
5 have added this to my comments about the  
6 institution. On July 11th, following the receipt  
7 of the letter, we sent a letter to the  
8 institution indicating that they needed to  
9 implement the teach out that was required by the  
10 state of New York. And we also removed --  
11 indicated to them that the sites -- they had  
12 three extension sites.

13 So, offering less than 50 percent of  
14 a program in the state of New York, it was not a  
15 branch campus, or an additional location, but we  
16 indicated in that letter that those sites would  
17 be removed from their fact sheet, and were no  
18 longer approved sites in the state of New York.

19 J. BLUM: So, and had you previously  
20 required, because they had previously been on  
21 probation. So, had you previously required them  
22 to have a plan, and now because of New York, they

1 have an agreement?

2 L. Beatty: Yeah.

3 J. BLUM: Okay, and then I noted as I  
4 was going through, this sort of prompted my  
5 interest, I'm always sort of intrigued by when  
6 agencies decide -- I know there are regulations  
7 on this, but what prompts agencies to decide the  
8 moment is right other than just what the federal  
9 law says about teach out plans. And so, I just  
10 pulled up that section of your report.

11 I noticed that your exhibits, I  
12 actually thought I might find that the exhibit  
13 was that institution that I found, I think there  
14 were two, or three others. How many institutions  
15 are you currently requiring to have teach out  
16 plans?

17 L. Beatty: All of our candidate  
18 institutions are required to have a teach out  
19 plan. We just do that as part of the candidacy  
20 process. Once they are given candidacy status,  
21 because as I mentioned earlier, we continue to  
22 monitor our candidate institutions, and shepherd

1       them through the process to reaffirmation,  
2       they're all required to have a teach out.

3               The other institutions that have a  
4       required teach out right now are those listed as  
5       being on sanction on our website. So, our  
6       institutions that are on probation, and show  
7       cause were required to have a teach out.

8               J. BLUM: And I know I can look this  
9       up, and I will, but how many is that? Do you  
10      happen to know?

11              L. Beatty: We have one institution on  
12      warning currently, but there's not a required  
13      teach out for warning. I think there are two  
14      currently on probation, and one on show cause.

15              J. BLUM: Thanks.

16              CHAIR KEISER: Thank you Jennifer.  
17      I'm not aware of any third party comments. Dr.  
18      Harris, do you have any comments?

19              N. Harris: I have nothing to add,  
20      thank you.

21              CHAIR KEISER: Thank you very much.  
22      I will then ask the primary leaders Molly, and

1 Robert, if you would like to make a motion?

2 R. MAYES: Yes, we are good with the  
3 motion that the staff made, and agree with it  
4 should be that we move that NACIQI recommend the  
5 senior department official approve the  
6 Association for Biblical Higher Education for  
7 review recognition for five years.

8 CHAIR KEISER: Is there a second to  
9 the motion?

10 M. HALL-MARTIN: I'll second.

11 CHAIR KEISER: Okay, there's a second  
12 by Molly. Is there discussion? Herman, you have  
13 a hand up?

14 H. BOUNDS: Yes, don't forget that the  
15 recommendation also includes to approve the  
16 agency's expansion should also include -- excuse  
17 me, direct assessment in their scope of  
18 recognition.

19 CHAIR KEISER: Do you accept that  
20 Robert as a formal amendment?

21 R. MAYES: Yes, absolutely.

22 CHAIR KEISER: And Molly?

1 M. HALL-MARTIN: Yes.

2 CHAIR KEISER: And Mary Ellen had a  
3 hand up, but it looked like it got dropped.

4 M.E. PETRISKO: No, I have it up again  
5 because I'm not really comfortable with this  
6 given the student achievement issue, and I would  
7 like to see language that reflects the need to  
8 have them come back to us after this project has  
9 been completed with what they've learned, and  
10 what they're actually doing about the  
11 institutions meeting that standard.

12 I did not see -- it sounds like  
13 they're going to be where they need to be, but  
14 there's no evidence of that now, so I would want  
15 to see some other kind of a report that would  
16 come back to us to show that they actually know  
17 where the institution stands with regards to  
18 student achievement, and that they're taking  
19 appropriate actions.

20 CHAIR KEISER: Jennifer?

21 PARTICIPANT: Yeah, Mary Ellen, I  
22 thought you might be going there with your



1 questions earlier, and appreciate your line of  
2 questions. So, I have a question about that,  
3 this type of situation. Are the scenarios -- and  
4 I'm asking I guess, all of us in the department,  
5 are the options to find them non-compliant with  
6 the student achievement standard, and that would  
7 prompt a compliance report in a year?

8 Or is there a substantial compliance  
9 with a monitoring report in a year, or is it less  
10 than five years? And the reason I'm asking this  
11 is not just stating the obvious, is I was  
12 listening, trying to listen pretty carefully to  
13 the time frames that the agency was saying, and  
14 they felt like they would have more information  
15 come November.

16 But then I'm also thinking well gosh,  
17 they'll have more information come November, but  
18 if they're really moving forward student  
19 achievement, sometimes it takes longer to  
20 actually really understand what the impact is.  
21 And so I'm not sure one year -- having them come  
22 back in a year makes a ton of sense either in

1 terms of learning anything.

2 And so, I'm just ruminating out loud  
3 on purpose so that we can consider what options  
4 there may be. And to me it seems like it's  
5 either one year, or make a decision that they're  
6 in compliance, but make it their next review less  
7 than five years from now. But I do remember how  
8 complicated that is for the department.

9 CHAIR KEISER: David?

10 D. EUBANKS: Yes, I just wanted to  
11 comment, one of the things that I think we  
12 learned in the subcommittee on student  
13 achievement is that the student learning outcomes  
14 are not required for the student achievement  
15 standard. So, I'm questioning whether, or not  
16 this would apply here. Herman could clarify  
17 that.

18 CHAIR KEISER: Herman, and then Molly?

19 H. BOUNDS: Yes, I was going to say  
20 two things. That the committee could find the  
21 agency non-compliant with something not -- that  
22 the staff did not find them non-compliant for.

1 And I think as Bob mentioned yesterday, that  
2 would kick in 602.35(c) where the agency would  
3 have a chance to respond, in addition to the  
4 senior department official.

5 But you have options to do either one,  
6 the department doesn't set, of course you all  
7 know, any student achievement outcomes other than  
8 what the agency requires for their particular  
9 institution. So, if you all believe that the  
10 agency is not applying its particular student  
11 achievement standards to this particular -- to  
12 the institutions they accredit, then if you  
13 wanted to find them non-compliant in that area,  
14 you could.

15 You could also, as you said, and I  
16 guess legal counsel is here to take that on here.  
17 But you could reduce the recognition period.  
18 Just remember that the new regulations require  
19 agencies to submit a petition of recognition two  
20 years prior. So, anything less than two years  
21 would not make -- would not I mean it would be  
22 problematic. So, something in the range of three

1 years would be better operationally for staff to  
2 review.

3 And then have the agency come back  
4 before NACIQI if that's the route that you choose  
5 to go off of.

6 CHAIR KEISER: Wally?

7 W. BOSTON: Thanks Art. I guess I  
8 hear what Mary Ellen, and Jennifer are saying,  
9 and I'm also listening to Herman, but I would be  
10 inclined to consider this as a monitoring report,  
11 and not a compliance report. Once again I go  
12 back to being on record, that this agency did an  
13 excellent job of addressing the data in the  
14 dashboard, which just came back recently after  
15 being taken down by the previous administration.

16 And it seems to me that they have a  
17 pretty good focus on annual indicators, and  
18 reviewing those, and what they've described as an  
19 ongoing project that we're curious about. But  
20 from my perspective, they're doing what they  
21 should do. They're trying to go for continuous  
22 improvement, and then -- so, if we're curious

1 about seeing the outcome of it, I'd voice my  
2 preference for a monitoring report versus a  
3 compliance report.

4 CHAIR KEISER: Wally, would you like  
5 to make that a motion -- or excuse me, modify the  
6 original motion?

7 W. BOSTON: Yes, if that's acceptable  
8 to the two proposers, yes.

9 CHAIR KEISER: Is there a second to  
10 the amendment?

11 J. BLUM: I second that amendment.

12 CHAIR KEISER: Is that considered  
13 friendly by the member of the motion? Robert?

14 R. MAYES: Yes.

15 CHAIR KEISER: It is considered  
16 friendly, same thing with you Molly?

17 R. MAYES: I think Mary Ellen though  
18 has more discussion points on it.

19 J. BLUM: The only thing I wanted to  
20 say was clarifying what my concern was. It  
21 wasn't about the federal criterion, it was that  
22 the standard was nothing applied by the agency

1 appropriately given what the materials showed of  
2 how they were -- the teams, and the agency were  
3 evaluating compliance with that standard.

4 CHAIR KEISER: So, the monitoring  
5 would be appropriate to see that they were  
6 applying it appropriately. Wally, is that your  
7 feeling?

8 W. BOSTON: That was my feeling, but  
9 you know.

10 CHAIR KEISER: Okay, so we have a  
11 motion that's been amended as a friendly  
12 amendment. Angela, and Herman have their hands  
13 up.

14 H. BOUNDS: I was just going to say  
15 that yeah, you could use the statute compliance  
16 too, and that would require the monitoring  
17 report. I don't know if Angela had anything to  
18 add, I'll take my hand down now.

19 A. SIERRA: Yeah, hi, this is Angela  
20 Sierra, I'm sorry, I have to move over to where  
21 the audio is in our room here. That's exactly  
22 why I wanted to raise Herman, under 60234G, the

1 committee could find that the agency is  
2 substantially compliant with the criteria not  
3 recommended by the staff, and require -- or  
4 recommend a monitoring report with a set  
5 deadline.

6 They could also find non-compliance,  
7 and then recommend a compliance report. I think  
8 that the committee could also find the agency  
9 compliant, and still recommend a monitoring  
10 report, although that's not specifically  
11 contemplated in the regulations.

12 CHAIR KEISER: Okay, Claude, and Bob.

13 VICE CHAIR PRESSNELL: Thanks. Again,  
14 this is on the amendment obviously, so I'm  
15 curious. I'm hearing Mary Ellen say that she  
16 feels as if the agency is not compliant right  
17 now, and I want to make sure that that's exactly  
18 what she's saying. Because I want to be careful  
19 not to punish the accrediting body for making  
20 movements towards accommodation of more direct  
21 measurements.

22 And so, just because they haven't done

1       it yet, and are in the midst of doing it, I don't  
2       want to come down, and say you're not compliant  
3       when they say that they're working on it. I hope  
4       that makes sense. So, Mary Ellen, you're saying  
5       specifically they are out of compliance with that  
6       criteria, is that correct?

7                   M.E. PETRISKO: It looks to me like  
8       based on what we have seen, they are not in  
9       compliance. And I do understand that they have  
10      recognized themselves that there have been issues  
11      in how they have evaluated student learning, and  
12      they are currently in the process of a project to  
13      review all of their institutions to see what  
14      those institutions are doing, and how they as an  
15      agency should move forward with that.

16                   That hasn't happened yet, so that's my  
17      concern. And I don't want to be too harsh  
18      either. I appreciate the fact that the agency  
19      itself discovered where improvement is needed,  
20      but part of me says that is an indication that  
21      there has been a problem, the problem still  
22      exists until it's fixed, and so yeah. I



1 understand, absolutely your perspective, and  
2 wanting to be understanding, and work with the  
3 agency.

4 And recognize, and applaud improvement  
5 efforts, and my concern is we're acting based on  
6 what we have now.

7 VICE CHAIR PRESSNELL: Right, and in  
8 terms of clarification, I was really looking for  
9 because I will say based on their presentation,  
10 they've probably been the most direct in  
11 addressing student measurement than anybody has  
12 that we've seen before. But I think that in  
13 light of doing that, they have discovered that.  
14 So, thanks for that clarification.

15 M.E. PETRISKO: Thank you.

16 CHAIR KEISER: Bob, then David, then  
17 Ronnie, and then Angela.

18 B. SHIREMAN: Thank you. So, the  
19 regulation that Herman mentioned, where it  
20 triggers their ability to provide some additional  
21 information has us finding either that the agency  
22 is non-compliant with something, or ineffective

1 in its application of that item. So, that tells  
2 me we don't actually have to -- to me it seems  
3 like the most important thing is that there's an  
4 area we're concerned about.

5 And we think there might be a problem  
6 here, and it might require a monitoring report,  
7 or a compliance report. That we as the advisory  
8 committee want to raise that to the senior  
9 department official. The senior department  
10 official can make the decision about whether it's  
11 a compliance report, or a monitoring report. So,  
12 the language actually is kind of round, that the  
13 general counsel suggested could work.

14 Where we add something, we could, if  
15 the makers of the motion want to do it, say  
16 something like recommend that the senior  
17 department -- wait, no, with the addition of a  
18 compliance, or monitoring report as appropriate  
19 regarding student achievement. And that way  
20 we're raising the issue, it kind of causes the  
21 senior department official to look at the  
22 transcript, look at the question, and make that

1 decision for us.

2 On the other hand if we're sure it's  
3 non-compliance, and it should be compliance  
4 report, we could suggest that.

5 CHAIR KEISER: Just to let you know  
6 Bob, that we do have a motion before, and it was  
7 amended to include a monitoring report. So, we  
8 haven't voted on it, but that's where we are.  
9 David?

10 D. EUBANKS: Yes, thank you. So, I'll  
11 reiterate, and let Herman contradict me, that the  
12 student learning is not required for student  
13 achievement. The agency could simply just drop  
14 all that, they don't have to put it in the  
15 presentation. The second thing is that if we  
16 insist on it, and make them scramble around, and  
17 try to answer that question, it could easily work  
18 against student achievement in a practical sense.

19 And that's because these kinds of  
20 reporting can be very burdensome for  
21 institutions, especially institutions that don't  
22 have a lot of resources to begin with. It costs

1 a lot of money, and time, and detracts from the  
2 actual student achievement work that they're  
3 doing with respect to grades, retention,  
4 graduation rates, tests, and that sort of thing  
5 they're already doing as evidenced in their  
6 exhibits.

7 And the final comment about that is in  
8 some cases agencies go so far as to prohibit  
9 research for example on types of data like  
10 grades, because some consultants say grades don't  
11 measure learning, and that further takes them  
12 away from the actual goal of student achievement.  
13 So, I'm not in support of this amendment, because  
14 I think it actually has a chance of doing harm.

15 CHAIR KEISER: Ronnie?

16 R. BOOTH: I'm going to echo what  
17 David just said, he said it better than I could.  
18 So, I have difficulty requiring something beyond  
19 even requiring the monitoring report. I think  
20 this agency's done excellent work, are obviously  
21 on the ball trying to do their work, and they did  
22 have a project underway, and truth be known,

1 every agency we vote on at some point in time is  
2 transitioning from compliance, to non-compliance,  
3 back to compliance in a day, or overnight.

4 So, I am much in favor of the comments  
5 David just made. I think renewing for five years  
6 with no monitoring report is the way we ought to  
7 go.

8 CHAIR KEISER: Angela, then Nicole,  
9 then Jennifer, I think will tie it up.

10 A. SIERRA: Hi, Angela Sierra from the  
11 Office of the General Counsel again. I thought  
12 that I heard Mary Ellen say that it wasn't the  
13 student achievement regulation in 60216, but the  
14 application of standards in 60217 that was the  
15 criteria she was concerned about. So, if there's  
16 criteria that the committee wants to direct the  
17 SDO's attention for a monitoring report, or a  
18 compliance report to, I just want that to be  
19 specified in the record.

20 CHAIR KEISER: Thank you. Nicole,  
21 real quick?

22 N. Harris: Yes, can you hear me? I

1 was just going to comment -- thank you Angela,  
2 that's also what I was trying to understand from  
3 Mary Ellen. She said that they were non-  
4 compliant with the criteria, and as David has  
5 echoed, as well as Ronnie about outcomes. The  
6 regulation requires them to have standards, and  
7 they demonstrated the application of standards.

8 And they have changed their policies,  
9 and they're actually getting ready to do a review  
10 of their standards, which will possibly make this  
11 standard for student achievement look different  
12 again. So, I'm just trying to figure out the  
13 time frame, and what exactly I would be looking  
14 for when it comes back to me to bring to the  
15 table to make sure that I'm addressing the  
16 concerns.

17 Because at this time it sounds as if  
18 it's out of my purview. So, just asking for  
19 clarity, and to remind the committee that the  
20 agency is reviewing their entire standards, which  
21 is required in 602 -- I think it's 27, or 26, for  
22 them to change their standards during a review,

1 and that will occur within the next time they're  
2 up for recognition.

3 So, again, this standard will be  
4 touched upon again in conjunction with the  
5 research they're doing on this project.

6 CHAIR KEISER: Thank you. Quickly  
7 Jennifer, and Bob, and then we'll go to a vote.

8 J. BLUM: Sorry, I appreciate the  
9 comments that Angela, and Nicole just made. To  
10 me, it's a combination, I do want to clarify  
11 something that David said. I disagree with  
12 David's position on this, and with regards to the  
13 student achievement standard, as the goals are  
14 set, they are required to have one. So, it's  
15 whether, or not they include quantitative  
16 measures, and whether they include student  
17 learning.

18 But they are required to have a  
19 student achievement standard where they're  
20 demonstrating the success of the student, however  
21 it is that they decide to do that. I applaud the  
22 agency for the steps that they're taking to both

1 clarify their standards, and then implement it.  
2 But I think the agency itself sort of admitted  
3 that they're not quite there yet.

4 And so to me, this is the perfect  
5 example of why substantially compliant may have  
6 come into existence by the department. It makes  
7 sort of sense, they've taken -- I applaud them  
8 for noticing their own issue, they're addressing  
9 it, but what we can't say, and I think this is  
10 where Mary Ellen is, and I think it's where I am,  
11 what we can't say with certainty is that they're  
12 applying that standard yet in a way that complies  
13 with -- and I think Angela, good point, it might  
14 be 602.17.

15 And not the question of whether they  
16 have a standard, or not under 602.16. So, I  
17 think that that's a good clarifying point, and  
18 Nicole, I hope that helps you a little bit in  
19 terms of what you would be looking for next year,  
20 as to whether they're applying their new standard  
21 in a compliant way. Which, I just don't think we  
22 have the answer to, which is why I think the



1 motion for a monitoring report indicating that  
2 they're substantially compliant makes sense.

3 CHAIR KEISER: Bob, then we'll go for  
4 the motion.

5 B. SHIREMAN: So, I am convinced by  
6 David, and Ronnie's concerns that requiring a  
7 monitoring report on this particular topic is the  
8 wrong thing to do. It has been a terrible burden  
9 on institutions with a lot of probations around  
10 very silly, and ridiculous, and expensive  
11 requirements around tracking so called student  
12 learning outcomes that are completely  
13 meaningless.

14 And many institutions have faced this,  
15 and it probably was the topic that spurred the  
16 subcommittee that we got on student achievement,  
17 and so I would actually prefer that the makers of  
18 the motion remove that portion. And I suppose I  
19 would suggest that if they don't want to remove  
20 the monitoring report, I'm interested in whether  
21 anyone would second my motion to remove that  
22 portion, and just go with a straight renewal of

1 five years.

2 CHAIR KEISER: So, excuse me, what  
3 we'll do is vote on the motion with the  
4 amendment, if we defeat the motion, we can then  
5 vote on the motion without the amendment. That  
6 would be the way we would do that.

7 VICE CHAIR PRESSNELL: Mr. Chairman,  
8 just a point of order. I thought we were just  
9 discussing the amendment, and so we could vote  
10 the amendment up, or down, and if we vote the  
11 amendment on, then we have to go back, and vote  
12 on the motion with the amendment. If we --

13 CHAIR KEISER: The amendment was  
14 accepted as friendly amendment by both the maker,  
15 and the second.

16 VICE CHAIR PRESSNELL: But we still  
17 need to vote on the amendment as a body, do we  
18 not?

19 CHAIR KEISER: We vote on the whole,  
20 with the amendment, and then if we defeat that,  
21 we can vote on just the original motion.

22 R. MAYES: Art, this is Robert, I made

1 the motion, maybe for time sake, and I agree with  
2 both points being made. Mary Ellen's points I  
3 think are real, and so are the others being made.  
4 But I wouldn't mind maybe for time's sake, going  
5 back to the original motion without any  
6 amendments if it's possible, and let that vote  
7 out first, and then see what happens.

8 CHAIR KEISER: Now, if I was going to  
9 be on my Robert's rules of order, we're talking  
10 an amendment that's already been approved. While  
11 you were the maker of the amendment, would you  
12 have a problem with that? We're asking Wally.

13 W. BOSTON: Yeah, I'm here, so I guess  
14 if Robert is not accepting the friendly  
15 amendment, then we can see how this votes out for  
16 five years without the monitoring report, or  
17 whether we -- if it's not approved, then we go  
18 back to the amendment.

19 CHAIR KEISER: Okay, so we are now  
20 voting on the original motion, which was to use  
21 the agency's recognition for five years. Unless  
22 you have something that you want to add that

1 would change that, is that real critical for you  
2 to get back in Bob, or Kathleen, or Zakiya?

3 Z. SMITH ELLIS: Just a clarifying  
4 question to understand what we're doing right  
5 now.

6 CHAIR KEISER: Right now we're doing  
7 the original motion which was made, and that  
8 would be as stated on the screen.

9 Z. SMITH ELLIS: Yes, but someone  
10 mentioned the substantially -- the new piece that  
11 is not at play here, this is just straight up --  
12 okay.

13 CHAIR KEISER: This is straight up  
14 recognition, correct.

15 Z. SMITH ELLIS: Thank you.

16 R. MAYES: And is Molly okay with  
17 voting this way first? I think she seconded.

18 CHAIR KEISER: Getting the thumbs up,  
19 Kathleen, is there anything you need to add?  
20 You're muted Kathleen.

21 K.S. ALIOTO: I would agree that the  
22 agency has demonstrated more than any that we've

1 had before us what they are trying to do to get  
2 into shape. So, I would support the motion as it  
3 is. Even though I totally agree with Jennifer.

4 CHAIR KEISER: Okay, we're going to  
5 have a vote, and you can make your comments as  
6 you vote, and make those short comments if you'd  
7 like. And the motion is as listed on the screen,  
8 we'll go through the roll call. Kathleen, you  
9 voted yes, you just said that, right? You're  
10 first.

11 K.S. ALIOTO: Yes, though that's not  
12 perfection.

13 CHAIR KEISER: Okay, Roslyn?

14 R. ARTIS: Yes.

15 CHAIR KEISER: Jennifer?

16 J. BLUM: No, because I think they're  
17 substantially compliant, and there should be a  
18 monitoring report.

19 CHAIR KEISER: Ronnie?

20 R. BOOTH: Yes.

21 CHAIR KEISER: Wally?

22 W. BOSTON: No, same reason as

1 Jennifer.

2 CHAIR KEISER: Ronnie, you had a yes,  
3 correct?

4 R. BOOTH: Yes.

5 W. BOSTON: I had a no.

6 CHAIR KEISER: Okay, and Wally has a  
7 no. Jill?

8 J. DERBY: No, with a comment that I'm  
9 agreeing with Jennifer. But further comment that  
10 if we in fact had the flexibility to do what Bob  
11 has proposed in the language, I think it would  
12 solve the problem that we would want to signal  
13 the senior department officer to look more  
14 carefully at this regarding the possibilities,  
15 and given the discussion that we've had today.

16 So, I want to speak in favor of the  
17 language that Bob has proposed, so that it gives  
18 us that kind of flexibility. Because I think for  
19 all of us there's sort of a grey area here, and  
20 if we had another option between yes, and no it  
21 would be good. I'm voting no.

22 CHAIR KEISER: Okay. If you could in

1 your comments, keep them short, this is not the  
2 time for discussion, we've already had that. And  
3 if we vote it down, we can have more discussion.  
4 David?

5 D. EUBANKS: Yes.

6 CHAIR KEISER: Michael?

7 M. LINDSAY: Yes.

8 CHAIR KEISER: Molly?

9 M. HALL-MARTIN: Yes.

10 CHAIR KEISER: Robert?

11 R. MAYES: Yes.

12 CHAIR KEISER: Mary Ellen?

13 M.E. PETRISKO: No.

14 CHAIR KEISER: Okay, keep going down,

15 Claude?

16 VICE CHAIR PRESSNELL: Yes.

17 CHAIR KEISER: Bob?

18 B. SHIREMAN: Yes.

19 CHAIR KEISER: Zakiya?

20 Z. SMITH ELLIS: Yes.

21 CHAIR KEISER: And Steve?

22 S. VAN AUDDLE: Yes.

1 CHAIR KEISER: Okay, the motion  
2 passes. Thank you all, thank you people from the  
3 commission, we appreciate the hard work that  
4 you've done. I'm recommending we take a five  
5 minute break, and we'll return here at 11:46 if  
6 that's okay with everybody.

7 R. MAYES: Yes, thank you.

8 (Whereupon, the above-entitled matter  
9 went off the record at 11:41 a.m. and resumed at  
10 11:49 a.m.)

11 CHAIR KEISER: Welcome back. I'm  
12 remiss for not introducing the great staff that  
13 we have both at the accrediting committee, and as  
14 well as in the review committee. So, George,  
15 would you introduce your team?

16 G.A. SMITH: Sure, so part of my team  
17 is Monica Freeman, and we're also supported today  
18 by members of OGC Donna Mangold, Angela Sierra,  
19 and Soren Lagaard, I'll move to Herman.

20 CHAIR KEISER: Thank you George.

21 H. BOUNDS: Thank you, good morning,  
22 my name is Herman Bounds, I'm the director of the



1 accreditation group, and I'll introduce my staff.  
2 Elizabeth Daggett, and Reha Mallory are not in  
3 attendance today. Nicole, I know you just spoke,  
4 but can you introduce yourself again please? I  
5 guess she is taking a break. Stephanie?

6 S. McKissic: Good morning, my name is  
7 Dr. Stephanie McKissic, and I'm an analyst with  
8 the accreditation group.

9 H. BOUNDS: Charity?

10 C. HELTON: I'm Charity Helton, and I  
11 am an analyst with the accreditation group.

12 H. BOUNDS: Karmon?

13 K. Simms-Coates: Hello, I'm Karmon  
14 Simms-Coates, and I'm an analyst with the  
15 accreditation group.

16 H. BOUNDS: Mike?

17 M. Stein: Good morning, Mike Stein,  
18 analyst with the accreditation group.

19 H. BOUNDS: LG?

20 L. Corder: LG Corder, analyst with  
21 the accreditation group.

22 H. BOUNDS: Paul?

1 P. Florek: Paul Florek, analyst with  
2 accreditation group.

3 H. BOUNDS: And Nicole, I saw your  
4 picture back up.

5 N. Harris: Yeah, I'm sorry about  
6 that. It's Dr. Nicole Harris again, sorry for my  
7 tardiness.

8 H. BOUNDS: Thank you Art.

9 CHAIR KEISER: Thank you Herman, and  
10 again, thank you staff for the tremendous amount  
11 of work that's done on behalf of the people of  
12 the United States. We're now on our second  
13 agency to review, and this is the Accrediting  
14 Council for Pharmacy Education, ACPE, and the  
15 primary readers are Jill Derby, and Robert  
16 Shireman.

17 The department staff is Charity  
18 Hilton. Jill, and Robert, the floor is yours.

19 B. SHIREMAN: All right, I will be  
20 taking this one on. The Accreditation Council  
21 for Pharmacy Education accredits, and pre-  
22 accredits professional degree programs in

1 pharmacy leading to the doctor of pharmacy  
2 degree. Currently the agency accredits  
3 approximately 114 programs, and pre-accredits 16  
4 programs throughout the United States and Puerto  
5 Rico.

6 Those programs are within institutions  
7 that are accredited by regional, and national  
8 accrediting agencies recognized by the secretary.  
9 Since ACPE is not an institutional accreditor,  
10 and does not serve as a gate keeper for Title IV  
11 funds, the agency is not required to meet the  
12 secretary's separate, and independent  
13 requirements. Is there another portion I'm  
14 supposed to read, or go onto staff?

15 CHAIR KEISER: No, I think you're  
16 fine. Charity?

17 C. HELTON: Good morning Mr. Chairman,  
18 and the members of the committee. My name is  
19 Charity Helton, and I am providing a summary of  
20 the review of the petition for renewal of  
21 recognition for the agency the Accrediting  
22 Council for Pharmacy Education, hereafter

1 referred to as ACPE, or the agency. I am  
2 presenting this report on behalf of the agency's  
3 analyst Rhea Mallory who could not be here today.

4 The staff recommendation to the senior  
5 department official for this agency is to renew  
6 the agency's recognition as a nationally  
7 recognized accrediting agency at this time  
8 subject to the submission of a compliance report  
9 due in 12 months, and a review, and decision on  
10 the compliance report.

11 In the event that recognition is  
12 continued following the decision on the  
13 compliance report, the period of recognition will  
14 not exceed five years from the date of the  
15 decision on the renewal of accreditation issued  
16 by the senior department official. This  
17 recommendation is based on a review of the  
18 agency's petition, and supporting documentation  
19 in addition to a virtual board meeting observed  
20 in February 2022.

21 Our review of the agency's petition  
22 found one area where the agency is not in

1 compliance with the secretary's criteria.  
2 602.26E requires that the agency provide brief  
3 summaries to the secretary of the reasoning for  
4 its adverse actions within 60 days of those  
5 decisions. The agency did not demonstrate that  
6 it regularly provided brief summaries to the  
7 secretary during the review period as required by  
8 this criterion.

9           There was one complaint filed during  
10 this review period, and after our review,  
11 department staff found the agency to be in  
12 compliance with the policies, and procedures.  
13 Lastly, there was one third party comment.  
14 Representatives from the agency are here to  
15 respond to your questions.

16           CHAIR KEISER: Thank you Charity. Any  
17 questions for the staff?

18           B. SHIREMAN: One question for the  
19 staff, and Charity might not be able to handle  
20 it, since Rhea I guess was the main person, but  
21 we'll give it a shot. This agency, like the  
22 others that we're seeing there were challenges on

1 some of the first round of questions, but then  
2 with the staff feedback, was able to get  
3 everything done, except this one little item that  
4 resulted in this compliance report  
5 recommendation.

6 I spent a little time trying to figure  
7 out exactly what the evidence was in this  
8 situation, and it looked to me as if the agency  
9 did provide -- it looked to me like they did  
10 provide reasons in their notification to the  
11 secretary by identifying the areas, the standards  
12 that the score was deficient in. So, I was kind  
13 of confused, there was an additional link to a  
14 document that had even more detail. But I was  
15 confused about why this was a deficiency.

16 C. HELTON: So, I am curious which of  
17 the exhibits you're looking at.

18 B. SHIREMAN: R71.

19 C. HELTON: If I recall correctly,  
20 that exhibit did demonstrate regular  
21 notifications to the secretary, and other  
22 relevant parties of the adverse actions. What we

1       were looking for were the brief summaries  
2       describing why the agency took those actions.  
3       And as you noted, they would provide a list of  
4       standards that were out of compliance, and they  
5       would state the term non-compliant.

6               We were looking for a summary, or some  
7       discussions as required by the criteria.

8               B. SHIREMAN: All right, so maybe I'll  
9       take another look. When I looked at R71, I don't  
10      have it in front of me, I thought it listed the  
11      standards that the school was found deficient in,  
12      do you have it in front of you, is that right?

13              C. HELTON: That is my recollection as  
14      well. But simply the list of the standards, we  
15      did not consider that to be a summary of the  
16      reasons for why the agency found the school non-  
17      compliant with those issues, or with those  
18      standards. They would simply list the standard,  
19      and then the term non-compliant, and we were  
20      looking for some explanation about the standard.

21              B. SHIREMAN: Something beyond that,  
22      I get it. Okay, great, thank you. Okay, that's

1 all the staff questions from me.

2 CHAIR KEISER: Great. Let me  
3 introduce Janet P. Engle, who is the executive  
4 director of ACPE. Welcome Dr. Engle, if you  
5 would introduce your team, and we're ready for  
6 your comments.

7 J. Engle: Great, good morning. I was  
8 going to turn it turn it over to the president of  
9 ACPE, Reza Karimi, but I am not certain he is on  
10 the Zoom. Can somebody verify that? I am not  
11 seeing him on my screen.

12 R. Karimi: I'm there.

13 J. Engle: You're here. Okay, let me  
14 turn it over to our president of ACPE, Dr.  
15 Karimi.

16 R. Karimi: Thank you so much. Good  
17 afternoon Chairman Keiser, and members of the  
18 committee. We would like to thank you for this  
19 opportunity to speak on behalf of the  
20 Accreditation Council for Pharmacy Education, or  
21 ACPE. My name is Reza Karimi, and I serve as the  
22 president of the ACPE board of directors. I am a



1 professor, and the dean of the School of Pharmacy  
2 at Pacific University in Oregon.

3 I want to first thank the department  
4 staff for all their work on our petition. We  
5 view the department as an important partner in  
6 what we do, and we have tremendously valued their  
7 input, and help throughout this process. I would  
8 like to take this opportunity to introduce my  
9 colleagues. I am joined by Dr. Janet Engle,  
10 executive director of ACPE.

11 Dr. Engle was appointed executive  
12 director in 2019 after extensive experience in  
13 academia, including having rose through the ranks  
14 to school professor with tenure, and serving as  
15 chair of her institution, Department of Pharmacy  
16 Practice, and as executive associate dean, as  
17 well as several other academic positions. She's  
18 also elected by her peers as the president of the  
19 American Pharmacy Association, and served that  
20 organization as a volunteer in many roles.

21 I'm also joined by Dr. Greg Boyer,  
22 associate executive director of ACPE, and

1 director of professional academic program  
2 activation. Dr. Boyer has been with ACPE for  
3 twenty years. I'm also joined by Dr. Dawn  
4 Zarembski, she's been director of accreditation  
5 at ACPE, who has been with ACPE for 22 years.  
6 Both are pharmacists with extensive experience in  
7 the profession.

8 I would like to turn it over to Dr.  
9 Janet Engle, to provide a brief overview of the  
10 agency, thank you.

11 J. Engle: All right, I am Jan Engle,  
12 and I am the executive director of ACPE. First,  
13 I'd like to start out by expressing our  
14 appreciation to Mr. Herman Bounds, and members of  
15 the accreditation group of the U.S. Department of  
16 Education. We would particularly like to thank  
17 Ms. Charity Helton, and Ms. Rhea Mallory for  
18 reviewing our petition, and supporting materials,  
19 and for providing guidance throughout the  
20 process.

21 At ACPE we are firmly committed to our  
22 mission, which is to assure the quality of

1 pharmacy education, and training, and supporting  
2 the advancement of the pharmacy profession. We  
3 are the only accrediting agency for pharmacy  
4 programs in the United States. We have been  
5 recognized by the U.S. Department of Education  
6 since 1952.

7 Under its scope of recognition from  
8 the department, ACPE grants accreditation, and  
9 pre-accreditation to professional degree programs  
10 that lead to the doctor of pharmacy degree, or  
11 PharmD program, including distance education  
12 programs. I should note that although not  
13 included in the scope of ACPE's recognition by  
14 the department, ACPE also engages in additional  
15 activities to ensure quality of pharmacy  
16 education.

17 That is we accredit providers of  
18 continuing pharmacy education, we certify  
19 international pharmacy degree programs, and in  
20 conjunction with the American Society of Health  
21 System Pharmacists, we do accredit pharmacy  
22 technician education, and training programs.

1 Just to share some statistics with you, presently  
2 ACPE accredits about 140 PharmD programs.

3 In 2021, there were approximately  
4 53000 students enrolled in those programs. That  
5 includes 13800 who were to graduate in the spring  
6 of 2022. We are entirely a programmatic  
7 accrediting agency, and all of our programs are  
8 located within institutions that are accredited  
9 by, or seeking accreditation from an  
10 institutional accrediting agency recognized by  
11 the department.

12 Because ACPE does not accredit  
13 institutions, it is not a gatekeeper of Title IV  
14 funds. ACPE is a programmatic accreditor, and as  
15 such its link to federal recognition as required  
16 by criterion 602.10 is through non-HEA federal  
17 programs. Specifically accreditation by ACPE is  
18 listed as an eligibility requirement for pharmacy  
19 programs that participate in the health  
20 professional student loans, and loans for  
21 disadvantaged students grant programs available  
22 through the U.S. Department of Health and Human

1 Services.

2 Health Resources and Services  
3 Administration, and the Bureau of Health  
4 Workforce. Review of the grant data that was  
5 obtained through the HHS tracking accountability,  
6 and government grants system website revealed  
7 that since ACPE's previous review by the  
8 department in 2017 over 230 grants totaling over  
9 23 million dollars were awarded to roughly 56  
10 pharmacy education programs.

11 We have a very diverse board comprised  
12 of ten individuals including educators,  
13 practitioners, and also a member of the public.  
14 Our board is an exceptional group of  
15 professionals who volunteer their time, their  
16 invaluable expertise, and experiences, and their  
17 perspectives to review programs for compliance  
18 with ACPE standards.

19 I am supported by an extraordinarily  
20 talented, and hard working staff. ACPE has 13  
21 full time staff positions, and one part time  
22 staff position. And that consists of both

1 professional, and administrative support staff.

2 Six of our professional staff are licensed  
3 pharmacists with doctoral degrees from accredited  
4 U.S. pharmacy programs, and have experience  
5 working in pharmacy education, and practice  
6 settings.

7 While one of our professional staff  
8 members received his pharmacy degree in Zimbabwe.  
9 They are also extremely dedicated to the mission  
10 of ACPE. As Dr. Karimi mentioned, Dr. Boyer, who  
11 is with me today, has been with ACPE for over 20  
12 years. And Dr. Zarembski has been with ACPE for  
13 22 years. We believe the long length of staff  
14 tenure provides a high level of consistency, and  
15 stability in the accreditation process.

16 Now I'd like to turn it over to Dr.  
17 Greg Boyer to provide some additional information  
18 about our accrediting activity, and to address  
19 the final staff analysis from the department.

20 J.G. BOYER: Thank you very much. I  
21 am Dr. Greg Boyer, and I am associate executive  
22 director of ACPE, and director of professional

1 degree program accreditation. First I would like  
2 to summarize ACPE's accreditation activities  
3 since it was last recognized by the department in  
4 2017. Since 2017, ACPE has conducted, and taken  
5 action on 88 comprehensive evaluations.

6 And those are those that require the  
7 every eight years self study, and 73 focused  
8 evaluations, which are evaluations defined by  
9 program status, particularly programs in  
10 development, or those establishing a branch, or  
11 new pathway. As well as when the board has  
12 determined the need for additional information  
13 for established programs.

14 In addition, ACPE has evaluated, and  
15 taken action on 313 interim reports. Reports on  
16 specific issues, and initiatives covered by the  
17 standards for which the board is in need of  
18 additional information on development, new  
19 initiatives, or adjustments to ensure continued  
20 compliance with the accreditation standards.  
21 During this time 13 new programs were granted  
22 accredited status.

1 ACPE currently has two additional  
2 programs holding candidate status. Regarding  
3 adverse actions, since the last review by the  
4 department, seven programs have been placed on  
5 probation, two programs were withdrawn, one was  
6 an accredited program, and one holding candidate  
7 status. And one program was denied a pre-  
8 candidate status.

9 Another significant update since our  
10 most recent recognition is that we have launched  
11 a process to revamp our standards. Per ACPE  
12 policy, we use a systematic program review to  
13 ensure that our standards are appropriate for the  
14 education preparedness of students, and are  
15 adequate to evaluate the quality of the education  
16 provided by the program.

17 The current standards were developed  
18 with additional input from all ACPE stakeholders  
19 through surveys, open hearings, and open comment  
20 periods. These stakeholders included the  
21 colleges, and schools of pharmacy, professional  
22 pharmacy organizations, student pharmacy



1 organizations, and accrediting bodies as well as  
2 the public.

3 Our current standards were adopted in  
4 January of 2015, and became effective July 1st of  
5 2016 following a period of transition. In  
6 January of 2021, we announced our intention to  
7 revise the doctor of pharmacy standards.  
8 According to our projected time line, the new  
9 standards, which are going to be known as  
10 standards 2025, will be released in 2024, and  
11 implemented on July 1st of 2025.

12 I want to move to address the single  
13 finding of the department's final staff analysis.  
14 The finding is centered around the department's  
15 regulation 602.26E, which requires that for any  
16 final decision to take an adverse action, ACPE is  
17 required to make available to the secretary, and  
18 other stakeholders no later than 60 days after  
19 the decision a new statement summarizing the  
20 reasons of the agency's decision.

21 And the official comments that the  
22 program may wish to make, or evidence that the

1 program was offered opportunity to provide such  
2 comment. ACPE's initial petition for continued  
3 recognition submitted in September in 2020  
4 referenced the final decision to withdraw  
5 accreditation as stated in the July 2020 meeting.

6 We timely notified the secretary, and  
7 all required other stakeholders, and the public  
8 about the decision on the same day we took the  
9 action, and made it public. In that notice, we  
10 specified the standards cited as the basis for  
11 the adverse action. This note was submitted in  
12 our April of '22 petition to address staff  
13 analysis in Exhibit No. R71.

14 However the draft staff analysis  
15 stated that ACPE did not demonstrate it had  
16 submitted to the secretary within 60 days a  
17 statement summarizing the reasons for the adverse  
18 action. ACPE posted on its website a narrative  
19 statement summarizing the meeting beyond the  
20 initial action that listed just the standards,  
21 along with the program's response.

22 While the full narrative statement was

1 available to the secretary, other state  
2 governance, and the public on ACPE's website, we  
3 have determined the narrative statement was not  
4 forwarded to the secretary within the required 60  
5 day period. To address this, the ACPE has  
6 updated its adverse actions checklist to ensure  
7 that going forward, the full narrative statement  
8 is provided directly to the secretary, and all  
9 required stakeholders within the 60 day period.

10 This updated checklist was provided to  
11 the department in response to the draft staff  
12 analysis. In addition, ACPE has recently  
13 demonstrated compliance with this requirement.  
14 At the January 2022 board meeting, the board  
15 denied pre-candidate status to a program. ACPE  
16 timely submitted for the secretary, a narrative  
17 statement summarizing the reasons for ACPE's  
18 denial decision, and the official comments from  
19 the program.

20 This information was also posted on  
21 ACPE's website on the same day. The information  
22 regarding this recent action was included in

1 ACPE's response to draft staff analysis as  
2 Exhibit No. R81, and we believe that the  
3 information provided in the exhibit fully  
4 addresses the requirement of the criterion  
5 602.26E going forward.

6 We respectfully request that the  
7 committee, and the department consider our recent  
8 efforts to demonstrate compliance with this  
9 regulation, as demonstrated in Exhibit No. R81.  
10 We also want to assure the committee that we have  
11 fully addressed this issue, and are confident  
12 that we will continue to comply with the  
13 requirement going forward.

14 Again, we thank the department staff  
15 or their guidance, and assistance through this  
16 process. We look forward to answering questions  
17 that the committee may have regarding our  
18 petition. Thank you.

19 CHAIR KEISER: Thank you, Mr. Boyer, or  
20 Dr. Boyer.

21 Permanent readers, Jill, Bob, do you  
22 have questions for the agency?

1                   B. SHIREMAN: Yes, thank you very much.  
2 Just in response to what Dr. Boyer just, just  
3 said.

4                   My inclination at this point is, is to  
5 conclude that in fact, the one item that was  
6 identified as an issue in the staff report, has  
7 been, has been addressed pending, pending any  
8 further discussion that may come from, from  
9 questioning.

10                  I wanted to start with the issue of  
11 the structure of this agency, which is very  
12 interesting.

13                  And, Dr. Engle talked about the 10-  
14 member board. This board is unlike many, or most  
15 accrediting agencies, is actually not a majority  
16 of schools.

17                  It's state regulators and  
18 practitioners, form, and a public member, form a  
19 majority of, of the board.

20                  Dr. Engle, has this, I mean you guys  
21 have been around since 1952. Has this structure  
22 been the structure all along? Or what is it that

1 prompted the creation of this kind of an  
2 approach?

3 J. ENGLE: This has been our structure  
4 since the very beginning. So, we have always  
5 wanted diversity on our board, to make sure that  
6 our standards are meeting the needs of the  
7 profession, and assuring quality in pharmacy  
8 education.

9 And, you know, obviously I was not  
10 there back in 1932 when we started all of this,  
11 but the idea was to have practitioners,  
12 regulators, as well as academics and our public  
13 member, to serve this organization well, and make  
14 sure that we are making the best decisions we  
15 can.

16 B. SHIREMAN: And, rather than being a  
17 self-appointing board, you have these other  
18 organizations, organizations of state regulators,  
19 organizations of practitioners, et cetera, that  
20 designate your particular board members.

21 I did want to ask about the public  
22 member. Your public member position is appointed

1 by the American Council on Education.

2 A perfectly fine organization, but it  
3 does look from the people that they've tended to  
4 name, is that they have tended to be from  
5 academia, and not necessarily a consumer  
6 orientation.

7 Has ACE always been the one appointing  
8 the public member, or have you considered any  
9 other, any different entity to appoint the public  
10 member?

11 J. ENGLE: As far as I'm aware, ACE has  
12 always appointed the public member. I have to  
13 say the public member has served us well because  
14 as you mentioned, we don't have a heavy group of  
15 academicians on our board.

16 So having the public member with some  
17 of that background, has been quite helpful.

18 B. SHIREMAN: Okay, thanks.

19 But one of the big issues with a  
20 degree like pharmacy where people are paying a  
21 lot of tuition, and taking out a lot of loans, is  
22 the hazard that they take out all those loans and

1 then can't, cannot get a job because they did not  
2 pass the exams.

3 And, so I know that in some of the  
4 disciplines, there's a real effort kind of along  
5 the way, to make sure that if there's any  
6 indication that the student is just not going to  
7 make it, not going to be able to pass that exam,  
8 that they are out early before they have taken on  
9 huge amounts of debt.

10 I saw kind of mixed information in  
11 your application about to what extent you track  
12 the, those exams.

13 My understanding is there are two  
14 exams and there's the pharmacy exam, and then a  
15 kind of a pharmacy law exam, the jurisprudence  
16 exam.

17 And, it looked like the passage rates  
18 on the pharmacy jurisprudence exam, that they've  
19 had a fairly high failure rate. So, some real  
20 hazard that you've got people who are, who are  
21 not passing.

22 Can you talk a little bit about how



1       you track such things, and how you help to ensure  
2       that people don't end up with huge amounts of  
3       debt, and no, and without the ability to work in  
4       the profession?

5               J. ENGLE: All right, there's a  
6       multifaceted answer. So, I'm going to start, and  
7       then I'll have Greg kind of chime in.

8               But we look at a whole variety of  
9       monitoring parameters throughout the curriculum.  
10      So, we don't just look at board exams and whether  
11      you pass.

12              We do look at annual monitoring  
13      parameters, so for every year, for every program,  
14      we look at things like their on time graduation  
15      rate.

16              We look at their academic dismissals.  
17      We look at withdrawals. We look at delayed  
18      progression.

19              So what we try to do is catch these  
20      issues early on so as you say, the students don't  
21      end up incurring tons of debt.

22              On the other hand, there is a

1 responsibility of the program if they have  
2 admitted a student, to do the very best they can  
3 to make that student successful.

4 And, so we do ask programs to look at  
5 their annual monitoring, and if we see them meet  
6 one of our benchmarks where maybe their attrition  
7 is higher than normal, or their progression,  
8 whatever it is, we ask them to do a root cause  
9 analysis, and let us know what they find.

10 And, sometimes it's things outside of  
11 the school's control. So for example, you may  
12 have attrition because somebody just decides  
13 pharmacy wasn't for them.

14 Or it could be that something terrible  
15 happened, an accident or something where they've  
16 had to withdraw. So we take all of that into  
17 account.

18 Of course, we do look at the passage  
19 rate for the board exams, and that's very  
20 important, as well.

21 Because obviously if you can't pass  
22 the board exam, you can't be a practicing

1 pharmacist, so that's an issue.

2 But I'll let Greg talk a little bit  
3 more about how we handle passage rates for the  
4 board exam.

5 J.G. BOYER: Well, thank you.

6 The methods passage rate is a critical  
7 licensing requirement that we have for entering  
8 the profession, and we monitor that very  
9 carefully.

10 For many years, the benchmark for our  
11 concern has been two standard deviations below  
12 the mean, which takes into account changes in the  
13 exam blueprint and testing parameters, that have  
14 been put into place over the various time  
15 periods.

16 So I think that parameter has served  
17 us very well.

18 When a program hits a monitoring  
19 threshold like the NAFLAC's certain pass rate, or  
20 the monitoring thresholds, which have been fairly  
21 stable over all these years that we've been using  
22 them.

1                   They're about two times the national  
2                   average, that has been reported by the various  
3                   programs in the academy.

4                   When a program hits that monitoring  
5                   threshold, they are asked by the board to provide  
6                   a root cause analysis of what the problem might  
7                   be.

8                   They can too, they provide a response  
9                   to that. If they have not addressed that  
10                  concern, three years and five years we have a  
11                  rule we call the three and five year rule.

12                  And, that means that if you hit an  
13                  annual monitoring parameter anytime within a,  
14                  three times within a five year period, you get  
15                  the opportunity to meet with the board, to come  
16                  and talk about what you're doing, to hear ideas  
17                  from the board about what you might be doing  
18                  further. Those kind of things.

19                  They've been very fruitful  
20                  discussions. Of course, that's an invitation  
21                  that no one wants to receive, but they have been  
22                  helpful in helping out programs address some of

1       their concerns.

2                   And, then as we go through with that,  
3       if programs fail to address those parameters  
4       adequately, that leads to a non-compliance with  
5       the accreditation standard, and we get into to  
6       that kind of discussion later going forward.

7                   But it's a very detailed and step-wise  
8       process that we take to try to right the ship, if  
9       you will, so that the root cause analysis can  
10      identify the areas that might be of concern.

11                   Is it enrollment parameters? Is it  
12      curriculum content? Is it even instruction, and  
13      faculty development might be the solution to some  
14      of the problems.

15                   So all those are very rich discussions  
16      that we have, and the board takes all that into  
17      consideration when it's making its action  
18      decisions.

19                   B. SHIREMAN: Thank you.

20                   So just to confirm, so unlike, we've  
21      seen some other agencies where they have, for  
22      example, some specific, specific number in their

1 standards, or compliance guide or something where  
2 if you hit it, something in particular, you know,  
3 you're out of compliance or something like that.

4 I think you say in your narrative that  
5 the passage rates are not, not in and of  
6 themselves, used as a direct determinant of  
7 compliance, or non-compliance.

8 So you don't have a rate there, but  
9 you sort of do in the sense that if they, if they  
10 hit certain rates, a process begins. Is that  
11 right?

12 J.G. BOYER: That's absolutely correct.

13 If they hit those thresholds, then  
14 that puts things into play, in terms of action  
15 that needed to be taken to follow up.

16 And, it escalates if things are not  
17 addressed in terms of what action is, is taken by  
18 the board.

19 But it is an intricate process, with  
20 opportunities to work with staff to help the  
21 program address the issues that they have.

22 B. SHIREMAN: I noticed one part of

1 the, and I don't know if it's this process or  
2 another process, but there is this public  
3 interest panel, which in the staff report  
4 actually it said that this is essential, and I  
5 totally agree, really interesting component that  
6 I have not seen at other accrediting agencies.

7 Where a panel of I think three people,  
8 essentially public member types of people, who,  
9 who review a lot of the items that end up coming  
10 before the board.

11 Can you talk about that? You or  
12 others on your team, talk about that? The role  
13 of that panel?

14 J.G. BOYER: I'm happy to do that.

15 I love working with the public  
16 interest panel, and so I'll preempt my boss and  
17 take this one because it's an enjoyable part of  
18 the conversation.

19 The public interest panel is a group  
20 of people who have I think what you're looking  
21 for, in terms of a real public perspective. They  
22 may have health care background, but it isn't

1 pharmacy.

2 They are difficult to recruit, if you  
3 will. We seem to always have a really good lead  
4 and it turns out that lo and behold, they have a  
5 child who's in pharmacy school.

6 Or some link that disqualifies them,  
7 because there can be no family link to the  
8 profession of pharmacy.

9 So we recruit these people from  
10 various areas of our other lives. Boards we've  
11 served on and for non-profits, those kinds of  
12 things. PTA areas have come to be public  
13 members.

14 And, we've had all the way from HR  
15 representatives in major corporations, to  
16 corporate lawyers. Ministers are good sources  
17 for serving in this capacity, as you might  
18 imagine.

19 And, so they review all of the  
20 evaluation team reports, and the recommended  
21 action documents before the board meeting.,

22 Now they review it from a public



1 perspective. They're not making decisions or  
2 anything like that. They're just looking at  
3 issues of consistency; and, I don't understand  
4 this sentence; and, you know, this isn't clear to  
5 me.

6 And, so they really do have a quality  
7 improvement component to what we do, as well.

8 But at the end of each of the public  
9 interest panel meetings, which is about two hours  
10 or three, before each board meeting, we as staff,  
11 will write a summarizing memo that characterizes  
12 the conversations of, of the public interest  
13 panel.

14 We will also highlight specific issues  
15 that they raise saying on the university of, this  
16 particular area is, is not clear to us.

17 Or it looks like it's out of line with  
18 what we've been seeing either at this meeting, or  
19 in past meetings.

20 The PIP members serve 5-year terms,  
21 which is a long time. They see a number of  
22 programs over the course of their five years, and

1 they can remember things because they are very  
2 public-minded, appreciating the role that they  
3 have.

4 In the initial staff analysis, I think  
5 there was a little concern that the PIP might be  
6 overstepping their authority in terms of decision  
7 making, but that, they have no role in that.

8 They just contribute to the  
9 conversation, and the board does rely on that  
10 conversation to explore more fully, issues that  
11 were of concern to the public interest panel.

12 And, maybe Jan you might add more.  
13 Sorry.

14 J. ENGLE: No, I'm glad that you  
15 explained it.

16 I'm relatively new to ACPE, and for  
17 me, the public interest panel has been very  
18 helpful. They have observations as Greg said,  
19 from a very public viewpoint, that helps us with  
20 consistency and best practices.

21 So, I think that they play a very  
22 important role. But as Greg said, they are just

1 advisory to the board. They don't have any  
2 decision making ability, or expectations.

3 But I think the board does really  
4 value their input and, you know, they do take it  
5 seriously.

6 B. SHIREMAN: Thank you. Yes, and I  
7 think the public interest panel approach is a  
8 model that other agencies should, should look at.

9 A really interesting way of bringing  
10 in additional public perspective, make sure what  
11 you're doing is as you say, not only quality and  
12 the right thing to do, but also that it makes  
13 sense to a layperson who's not, not from  
14 pharmacy, pharmacy area.

15 In your monitoring, I am, I did not  
16 see any indication that you monitor student debt  
17 levels and earnings, of graduates.

18 Is that something that you do, or have  
19 you discussed it, or rejected that?

20 J. ENGLE: I mean we look at it  
21 overall. I can give you some statistics as to  
22 where we are with that.

1                   The American Association of Colleges  
2 of Pharmacy does monitor it, and in 2021, the  
3 average debt for a pharmacy student was  
4 \$173,500.00.

5                   But it ranged, depending on whether  
6 you went to a public school versus a private  
7 school, which is understandable.

8                   The average starting salary based on  
9 the U.S. Bureau of Labor Statistics, and this was  
10 in May of 2021, was \$128,000.00.

11                  In terms of debt default, I had  
12 trouble, I was looking for that data, and what I  
13 found was between maybe less than 1 percent to 3  
14 percent. So it's fairly low.

15                  So, I think there's indications that  
16 student pharmacists when they graduate, they get  
17 licensed. They are able to handle the debt load  
18 that they have.

19                  You know, the salaries are very good  
20 for pharamcists. There's lots of opportunities  
21 out there.

22                  So it's not something that's specific

1       that we look at on a regular basis, but our other  
2       organizations within pharmacy do keep track of  
3       that.

4               B. SHIREMAN: I do want to encourage  
5       the, it used to be that it was difficult to get  
6       that kind of information on a, on a school  
7       specific basis.

8               But with the advances in the federal  
9       college scorecard, it is now, that data is now  
10      available on a school-by-school basis. Debt  
11      levels, earnings for many schools.

12              So I would encourage, encourage you to  
13      make that something that you look at to catch  
14      early, if there are schools where debt levels are  
15      soaring, or earnings are dropping.

16              J. ENGLE: Thank you.

17              B. SHIREMAN: Let me see, I think I had  
18      one or two other items.

19              Ah, so student complaints appear to be  
20      treated quite seriously. You gave an example of,  
21      that you accept complaints through an electronic  
22      process.

1                   You made it really easy for people to  
2                   identify, it was a you could click on and see  
3                   what the standards were so that they could  
4                   identify like oh, okay, this is about the  
5                   academic environment, or the facilities, or  
6                   whatever else.

7                   And, you gave an example about an  
8                   online program at a Florida institution not being  
9                   adequate.

10                  And, I noticed that you didn't ask for  
11                  any further documentation from the complainant.  
12                  You sent the complaint to the institution for  
13                  them to respond to.

14                  So it seemed like pretty open and easy  
15                  from the standpoint of the, the user, the  
16                  complainant.

17                  How has your experience been? How has  
18                  that process evolved over, over time?

19                  J.G. BOYER: Since we've gone to the  
20                  electronic version of the filing a complaint, it  
21                  is much easier for us to manage, and as you've  
22                  noted, for the complainant to zero in on things

1       that we can assist them with.

2               Even having said that though, the vast  
3 majority of our complaints come from students who  
4 want us to go in and change their grade.

5               And, so we spend a good bit of time  
6 working with those students, to appreciate that  
7 we are not the right authority for that.

8               We will address, direct them to the  
9 appeals process within the university, which we  
10 know they have, and we walk through all of that  
11 process with them.

12              So we spend a fair amount of time on  
13 the telephone with irate students, who are  
14 working through the process.

15              When we do get a legitimate complaint  
16 that is not change my grade, we do process that  
17 very timely.

18              We have office discussions about the  
19 content of the complaint, that I manage through  
20 my, my desk.

21              And, then I go directly to the dean  
22 with the charge, if you will, and ask for the

1 dean's response.

2 We get that response, and then that of  
3 course, leads to sharing with the board. At  
4 every board meeting we review all the complaints  
5 that have occurred during the last semester.

6 At each site team, a comprehensive  
7 review. We review all the complaints that have  
8 been compiled for that particular program during  
9 the eight year window, as required by the  
10 regulations.

11 And, so we keep a running log of  
12 active complaints at all times. So it is an  
13 engaging activity, if you will, that does keep  
14 everyone on their toes.

15 Program deans are very responsive to  
16 the 30-day window we give them to respond to, to  
17 the complaints.

18 And, in most cases, the complainant  
19 has left out some key pieces of information that  
20 the school is able to provide.

21 And, then we're able to put, you know,  
22 the pieces of the puzzle together to give a more



1 comprehensive review of what the concern the  
2 student might be having.

3 Or actually faculty member in some  
4 cases have had, and address that accordingly.

5 B. SHIREMAN: I really appreciate your  
6 care and attention to the, the reality that  
7 people who are submitting complaints, don't  
8 necessarily know all of the pieces that they need  
9 to put together. And that you follow up to kind  
10 of look into all of that.

11 All right, lastly, I have one very  
12 easy question for Dr. Karimi, your president.

13 So I knew nothing about Pacific  
14 University until a month ago I stayed at the  
15 Grand Lodge in your neighborhood. And, outside  
16 my room, there was a blurb on the wall about some  
17 of the history of Pacific University and the  
18 local community.

19 So, my question is, have you seen that  
20 blurb at the Grand Lodge nearby?

21 R. KARIMI: No, I don't, because our  
22 pharmacy is in Hillsborough, 11 miles to the

1 east.

2 B. SHIREMAN: You should check it out.

3 R. KARIMI: Thank you, but I'm happy  
4 to hear you visited our university.

5 B. SHIREMAN: Was there something  
6 there?

7 CHAIR KEISER: I thought you were  
8 finished.

9 B. SHIREMAN: I was going to see if  
10 Jill had anything.

11 CHAIR KEISER: That's where I was  
12 going, to Jill.

13 J. DERBY: Thank you. I want to  
14 compliment the Agency, I think it's been a joy  
15 reading their report and the process that  
16 followed on. I am going to have a question for  
17 Staff and this follows up on the comment Bob  
18 made.

19 It seems to me in reading it that this  
20 Agency had made every effort to address the  
21 shortcoming of the notification of accreditation  
22 decisions and I wondered if the compliance report

1 is still necessary.

2 This really probably speaks to the  
3 process and, Art, we can go to the next session  
4 where we have the opportunity for the Staff to  
5 respond. But it did strike me, I'm not sure this  
6 compliance report is necessary.

7 This Agency has made major effort to  
8 address the shortcoming that was noted by the  
9 Staff.

10 CHAIR KEISER: That would be good,  
11 let's have everybody ask the Agency the questions  
12 and then we come back to Charity, if that's okay  
13 with you, Jill?

14 J. DERBY: That's fine and that would  
15 be great.

16 CHAIR KEISER: I have Wally and Zakiya  
17 lined up for questions. Wally?

18 W. BOSTON: Taking myself off of mute,  
19 thanks, Art.

20 I noted when you reported just now  
21 that you talked about, and I want to make sure  
22 that I heard this, that when schools are outside

1 of two standard deviations from the mean on the  
2 licensure exam, you ask them for an explanation.

3 That seem to me to be a pretty low  
4 standard in the sense that what is that, out of  
5 140 institutions, about 3 on an annual basis.

6 I'm curious, if you expand that to  
7 let's just say the 10 percent of the outliers,  
8 which might be a maximum of 14, are there schools  
9 that are consistently in that lower end area and  
10 then how do you address that with them if they  
11 have consistently lower scores, given that would  
12 impact the employability of their graduates.

13 And we did hear that the average loan  
14 balance is about \$170,000 on an average salary of  
15 \$125,000 but that salary is dependent upon being  
16 licensed.

17 J.G. BOYER: We work with programs,  
18 there are certain program that are more  
19 frequently on the list of programs that meet  
20 those moderate thresholds for MATHX in particular  
21 than other programs, some are never on that list.

22 It does bounce around a little bit

1       though, often times shining a light on the issue  
2       directs the program to take steps they have not  
3       taken to better prepare students.

4               They have heightened their efforts to  
5       do MATHX preparation so that students during that  
6       final year are more engaged and thinking about  
7       the exam, which is shown in some cases to be  
8       very, very helpful moving and borrowing a bit up.

9               We do that, we also then share what we  
10      know in terms of things that work like bootcamps  
11      for students to come in with lower GPAs upon  
12      entry, those kinds of things. I often say if you  
13      have a troubled situation it can't be business as  
14      usual.

15              So, what are you doing as a program  
16      that is not usual as you're working through this  
17      issue you have in terms of improving MATHX pass  
18      rates.

19              And so proving to have been fairly  
20      successful in that, sometimes you're right, it's  
21      only two or three programs, other times it's  
22      seven of eight programs per year that we're

1 looking at to fit this threshold.

2 D. ZAREMBSKI: Greg, I would add that,  
3 yes, it's typically more in the six to eight  
4 range.

5 We've had one year, we're only three  
6 but it's usually up the six to eight range number  
7 of programs and it's not often repeat programs  
8 but if they are repeat, we do have that three and  
9 five-year-old that Greg talked about before,  
10 where if they are outside of that benchmark three  
11 years in a five-year period, they're called to  
12 meet with the Board.

13 J.G. BOYER: The one thing I would  
14 really like to look at in the future is we look  
15 at first-time pass rates and that's the number  
16 you're looking at.

17 Programs or students are able to take  
18 the MATHX exam three times in a year. When you  
19 get into the multiple test-takers, they get much,  
20 much better.

21 In fact, in the last three or four  
22 years we're hearing reports from the program that

1 student graduates will sometimes take the MATHX  
2 the first time as a practice, which I don't  
3 understand at all because if you don't do well,  
4 you're not earning income.

5 But it seems to be a mindset among at  
6 least some of our recent graduates that all  
7 important parameter of licensure as soon as  
8 possible is not absolutely essential to them.

9 So, I have a little trouble figuring  
10 out the impact of students who don't take the  
11 MATHX as seriously the first time as we might  
12 want them to but I think it's a current  
13 phenomenon perhaps that we're working through.

14 But I would like to expand the  
15 parameter and we're having conversations with the  
16 Board on looking at a broader parameter other  
17 than just the first-time pass rate.

18 CHAIR KEISER: Zakiya?

19 Z. SMITH ELLIS: I'm looking at the  
20 one standard that was in question in the  
21 Department Staff report and the exhibits and it  
22 sounded like from the discussion that the Agency

1 believes that it did submit materials.

2 But I'm looking on the system now at  
3 the pieces that you mentioned and none of them  
4 actually address that piece.

5 So, I see what the Department is  
6 talking about so I'm kind of curious, if you can  
7 in this moment provide a summary of why just one  
8 institution -- it was a pretty extraordinary  
9 action as the school was withdrawn.

10 It was a final action and so their  
11 accreditation was withdrawn and they're I  
12 understand going through a teach-out program and  
13 it's a historically black college and one of the  
14 few that has pharmacy programs, so pretty  
15 significant.

16 I think the college itself took issue  
17 with finding the purpose of the standard so that  
18 the college and others have an understanding of  
19 why the action was taken.

20 So, I'm curious if you can provide  
21 that now or you mentioned that it's put on the  
22 website. I Googled and can't find it on the



1 website, that explanation, so I'm just trying to  
2 find that summary, not just pointing to the  
3 standards that they didn't meet, a more  
4 explanatory summary of what they missed.

5 J.G. BOYER: In the history section of  
6 each program's website, a listing on our website,  
7 there is a detailed history. If you click on the  
8 year the action was taken, it will say ECP  
9 response and then scroll response on that  
10 particular program.

11 Those have been on our website within  
12 the 60-day requirements. What we didn't do was  
13 forward a direct copy of that to the Agency  
14 within that 60-day window.

15 You do have to look for it a little  
16 bit but it's clearly once you get into the  
17 history section below the program listing of the  
18 name, address, those kinds of things.

19 Below that, you will see the click  
20 here item within the year where the action is  
21 taken.

22 J. Engle: We did remedy that  
with the subsequent withdrawal of another program

1 where we did have those materials sent to the  
2 Department on time and that was Exhibit R81, I  
3 think I'm correct, correct me if I'm wrong.

4 There was that issue with the first  
5 program, the second one we did it as per the  
6 regulations. We submitted documentation to that  
7 effect and then we changed our policies  
8 internally to have a checklist to make sure we  
9 don't miss that in the future.

10 Since all of this happened, we did  
11 change it and we do have documentation that we  
12 changed it. Does that make sense?

13 Z. SMITH ELLIS: I understand that,  
14 I'm saying if I'm looking now to say what  
15 happened with that program, I'm not able to find  
16 that in the record that's been provided, at least  
17 to us.

18 And I'm new so this is my  
19 first meeting, and perhaps there's something in  
20 the system and someone from the Department can  
21 help me find that summary information that you  
22 said that you provided subsequently but I don't  
see that here.

1                   And it may just be an issue with our  
2                   system but I thought I heard it mentioned that it  
3                   was online and just a Google in the search part  
4                   of your website of the institution's name, I  
5                   can't find the history that you're speaking  
6                   about.

7                   So, I'm just thinking if the purpose  
8                   of this is transparency and whatnot and I have  
9                   access to this system and I'm trying to Google  
10                  what their rationale is, it may be a simple fix.

11                  But I am trying to figure out what is  
12                  the more substantive summary of the actions, not  
13                  just the citation of this is the number that they  
14                  missed, but what's the reasoning behind it?

15                  J.G. BOYER: That is in the history  
16                  section, as I mentioned, of the school listing as  
17                  you go to the state, I'll just walk you through  
18                  the website.

19                  Z. SMITH ELLIS: That would be great.

20                  J.G. BOYER: Go to the state listing  
21                  where you have the programs by state, do you see  
22                  that on the website?

1 Z. SMITH ELLIS: Yes.

2 J.G. BOYER: Click on there, go down  
3 to the state in question and go down to the  
4 program in question.

5 Once you get to the program in  
6 question, you will see the address information,  
7 who the Dean is, keep scrolling, and below there  
8 there is a history section.

9 Z. SMITH ELLIS: I see.

10 J.G. BOYER: And then you click here,  
11 the ACP statement which goes into greater detail  
12 about the particular standard that was  
13 problematic.

14 Z. SMITH ELLIS: I see, thank you.

15 D. ZAREMBSKI: You can also find that  
16 program under the withdrawn. So, we have  
17 programs and you can search them by their state  
18 or by their status. And if you look under  
19 withdrawn it would list that program there and  
20 you'll find the same information.

21 Z. SMITH ELLIS: Thank you, I found  
22 it, I appreciate that.

1 CHAIR KEISER: David?

2 D. EUBANKS: I want to go back to  
3 student achievement for a moment because I was  
4 reading through the narrative I found.

5 Lots of direct pointers to exhibits  
6 that had data in them and the data spans  
7 students' careers really from recruitment where I  
8 got to find out about how many students applied,  
9 were admitted, enrolled and so forth, all the way  
10 through the test scores.

11 So, I just want to compliment you on  
12 the level of documentation. I was also surprised  
13 by the two standard deviation thing, that seems  
14 like an often lax standard but that's only true  
15 if it's normal distribution.

16 So, using the data you provided I  
17 plotted it and it's not a normal distribution.  
18 There's a lot more than 2.5 percent in that lower  
19 tail and I wanted to ask first, I think I have  
20 three questions.

21 Those institutions in the lower tail  
22 of performance by the licensee exam, do they

1 persist there and if they are, are they fixable?

2 Do they show improvement over time or  
3 are there some schools that seem like they're  
4 just kind of struggling and struggling or in the  
5 gray area?

6 J.G. BOYER: There are programs that  
7 are characteristically on the lower end of that  
8 tail. They do bounce around a little bit. We've  
9 been hitting those parameters and not hitting  
10 those parameters.

11 And we work with them, like I said  
12 earlier, we spend a good deal of time counseling  
13 them, working with those programs to improve the  
14 situation. In answer to your question, there are  
15 certain programs that are customarily in that  
16 tail.

17 J. Engle: Can I just add one thing to  
18 that?

19 One of the reasons some of those  
20 schools languish is some of the things they're  
21 doing to fix their problems tend to be with  
22 curriculum or with faculty development or things

1       that take a couple of years to see results.

2               So, they may identify that their  
3       students are not doing well on the MATHX exam  
4       because of some curricular issue. In order to  
5       change the curriculum and go through all the  
6       mechanics that you have to do to do that, it  
7       could take some time.

8               So, that may be why also you're seeing  
9       certain schools in a certain area. We're waiting  
10      to see whether or not the root cause analysis and  
11      then how they're going to solve their problems is  
12      going to work.

13              So, we try to give them time to  
14      effect those changes.

15              D. EUBANKS: Makes perfect sense.  
16      Hypothetically, if there are schools in that  
17      lower end, it seems like they're going to consume  
18      a lot of your attention.

19              Practically speaking, is it possible  
20      to just yank their accreditation and have those  
21      students go somewhere else with limited access?

22              They'd probably be going to a better

1 school it sounds like.

2 J.G. BOYER: Often times the mission  
3 of individual programs helps define, if you will,  
4 the students that are enrolled there.

5 And so if you were to remove some of  
6 those programs from the mix, I think you would be  
7 creating a great advantage to some of the  
8 students who may not be able to get into some of  
9 our programs that are never on that watch list,  
10 if you will.

11 They're always on the other end of the  
12 tail. And so for the public good there's reasons  
13 why we work carefully with these programs to  
14 ensure they can do what they can do to address  
15 the situation.

16 We have face-to-face programs, we have  
17 programs that target first-generation college  
18 students, which is always a challenge in lots of  
19 cases. And so factoring their mission is really  
20 an important element of where they are in that  
21 tail sometimes.

22 And so we would not want to just



1 automatically yank their accreditation because  
2 they're problematic. That would be really very  
3 defeating to the best interest of the public  
4 actually.

5 D. EUBANKS: That's a great answer.

6 I understand the access question, that  
7 leads me to my next question. You mentioned that  
8 some of the struggling schools, when they do this  
9 root cause analysis, enrollment was something  
10 that sometimes came up.

11 If that's true, would you mind to  
12 elaborate on what sorts of enrollment problems  
13 and then assumed solutions were found?

14 D. ZAREMBSKI: I can start with this  
15 one, Greg, if you want. It's been discussed that  
16 if a program falls below that two standard  
17 deviation benchmark we reinitiate our process.

18 And I can give you one example of a  
19 program that had made some admission changes,  
20 they had lowered their bar for admission. And as  
21 a result, the MATHX pass rate dropped.

22 So, when they observed that and had to

1 report back to us, lo' and behold they upped  
2 their admission benchmarks again.

3 So, looking at the quality of the  
4 enrolled students is one thing that occurred and  
5 then putting in additional measures to assist  
6 those students also occurred. Greg, if you want  
7 to add onto that?

8 J.G. BOYER: I really liked the  
9 example. We do see programs, and some of the  
10 programs are struggling with enrollment right  
11 now, the Applicant pool for pharmacy students is  
12 a little tight, there are more choices for  
13 students.

14 A number of students who would come to  
15 our profession in the past maybe are going to  
16 other professions that have opportunities that  
17 may not have quite so much time involved in  
18 relaying the degree.

19 So, we've diluted the pool a little in  
20 that way. So, since then, programs have reacted  
21 to that to maintain their enrollments sometimes  
22 at their detriment. And lowering enrollments,

1 back to my comment earlier, when you do that what  
2 are you doing differently?

3 Because it can't be business as usual  
4 for this particular program because you're  
5 bringing in a group of students who may be a  
6 little bit weaker because of their lower GPA, and  
7 so what are you doing to ensure their success?

8 That's the first question we want to  
9 ask everyone we see, a reduction in the GPA  
10 requirement for admission for programs to respond  
11 to.

12 Because we don't want to get into the  
13 situation, as Joan just mentioned, that four  
14 years later we have a drop in MATHX because we  
15 brought in weaker students, but then nothing more  
16 to help them through the program for success.

17 D. EUBANKS: And I think you or  
18 something else said something that I think is  
19 inspiring, which is, and I'll paraphrase it, when  
20 we admit a student, we're responsible for them  
21 and responsible for their pathway to success,  
22 which I think is a great motto for higher

1 education.

2 My last question is related to all  
3 that and in your narrative you say that programs  
4 are expected to routinely assess admissions  
5 criteria as a component of the program's  
6 evaluation plan.

7 I wasn't able to find in the  
8 documentation one of those kinds of analysis,  
9 either it's not there or I couldn't find it.  
10 Could you comment on what goes into this analysis  
11 of the program's admission criteria?

12 I assume it's pointing towards success  
13 of students.

14 J.G. BOYER: It's part of our Standard  
15 25 which has to do with the key element of  
16 admissions criteria, that they be routinely  
17 evaluated and certainly, in every self-study  
18 that's done every eight years, the program will  
19 have provided us a component of their assessment  
20 plan where they're looking at various elements of  
21 student success, given correlations with  
22 admissions criteria.

1                   They'll look at feeder schools, that  
2                   kind of thing, maybe providing a large number of  
3                   students to them as undergraduates coming into  
4                   the professional program, get those students'  
5                   success, those kinds of things, and then make  
6                   appropriate adjustments based upon the outcomes  
7                   of the analysis of their assessment plan.

8                   D. EUBANKS: Thank you very much, A  
9                   plus.

10                  CHAIR KEISER: Seeing as there are no  
11                  more questions and I don't think there are any  
12                  third-party comments. Are there any other? I'm  
13                  not aware of any.

14                  If not, go to the chat box to comment  
15                  on the Agency's responses and discussion and I  
16                  think, Jill, you had a question for the Staff?

17                  J. DERBY: Yes.

18                  CHAIR KEISER: We can't hear you,  
19                  Charity. It looks like your microphone is on.

20                  C. HELTON: Can you hear me now?

21                  CHAIR KEISER: It's very low.

22                  C. HELTON: I don't know why it is

1       problematic.

2                   B. SHIREMAN: Talk loud because I can  
3 tell what you're saying.

4                   C. HELTON: Are you able to hear me  
5 now?

6                   CHAIR KEISER: Almost.

7                   C. HELTON: In response to the  
8 question about the Agency's compliance with 602  
9 26E, the Department's recommendation is based on  
10 a review of the Agency's compliance throughout  
11 the review period.

12                   The Agency did provide one sample case  
13 in Exhibit R81 of the Agency complying with 602  
14 26E and the Agency did indicate its intention to  
15 comply with this regulation in the future,  
16 however, this was just one instance of  
17 compliance.

18                   Since several other notifications of  
19 adverse actions were reviewed and found non-  
20 compliant, Department Staff determined the Agency  
21 was not in compliance with the criterion during  
22 the review period, so our recommendation was made

1 based on that set of information.

2 I hope that was audible.

3 CHAIR KEISER: Any other comments  
4 regarding the conversation by the Agency?

5 C. HELTON: No comments.

6 CHAIR KEISER: Jill, did that answer  
7 your question?

8 J. DERBY: Yes, it did.

9 CHAIR KEISER: Are there any other  
10 questions for the Staff? Thank you, Charity.  
11 Sensing none, I would go to either Bob or Jill  
12 for a motion to start the conversation.

13 B. SHIREMAN: My inclination on the  
14 compliance question is that the prior  
15 notifications that were identified as not  
16 adequate involved a situation where there  
17 actually was a link available to the information  
18 with the reasons.

19 The R81 shows that they have addressed  
20 that by now sending the reasons to the Department  
21 of Education and have changed their policy or  
22 checklist so that that will continue to happen in

1 the future.

2 So, my motion is to recommend that the  
3 senior department official renew the Agency for  
4 five years and encourage the Agency to monitor  
5 student loan debt and post-graduation earnings.  
6 So, in other words, my motion if seconded would  
7 not include the compliance but would encourage  
8 them to monitor debt and earnings.

9 CHAIR KEISER: I have a question about  
10 that. You had encouraged them but it's not for  
11 the Department to monitor?

12 B. SHIREMAN: Correct, the Agency to  
13 monitor.

14 Yes, so, recommend that the senior  
15 department official renew the Agency for five  
16 years and encourage the Agency to monitor student  
17 loan debt and post-graduation earnings.

18 CHAIR KEISER: Is there a second to  
19 the motion?

20 J. DERBY: I second the motion.

21 CHAIR KEISER: Jill seconds it, I have  
22 Jennifer with a question or a concern or comment.



1 J. BLUM: I'm all for encouraging  
2 agencies to do things but to me that feels like  
3 we're going back into why isn't that just a  
4 comment on the vote? Why is that part of a  
5 motion to encourage?

6 And I would say that under 602.16 the  
7 Department is pretty, and we are, limited in  
8 spelling out if one were to consider that and  
9 earnings to be outcome measures of student  
10 achievement.

11 I'm not sure why we're calling this  
12 out on this Agency and not every other Agency and  
13 I think we're limited by law actually in our  
14 ability to actually call out and encourage an  
15 Agency to pick an outcome metric seems to be what  
16 we're doing here.

17 So, I would say that it's a great  
18 comment to make when voting yes for the five  
19 years but I don't understand how it's making its  
20 way into a motion.

21 CHAIR KEISER: Zakiya?

22 Z. SMITH ELLIS: I'm going to address

1       that point in support of the concept of  
2       encouraging them to monitor this, even though  
3       it's a graduate degree that's very expensive and  
4       our encouragement, recommendation, as far as I  
5       understand from my training, doesn't actually  
6       require anything of them or of the senior  
7       department official.

8               It's just making the point but I also  
9       understand the point that maybe it's just a  
10      comment.

11             But I would support that piece. My  
12      comment though, my reason for raising my hand, is  
13      actually going back to the Staff recommendation  
14      about the compliance report.

15             I did go back and look at the website  
16      and the history and I'm not sure, again, this  
17      could be just because I'm new, I'm not sure what  
18      was customary but the history does show all of  
19      the different times when they were partially  
20      compliant, this institution, and the back and  
21      forth.

22             But each of those times when I

1 clicked, it just shows what the standard is  
2 they're not meeting, it doesn't say what happened  
3 that they didn't meet the standard, what was the  
4 evidence?

5 So, maybe it's just customary that is  
6 not provided but in case that is not customary,  
7 I'm just suggesting that in this instance  
8 specifically, because I am new I will probably  
9 defer to the Department's expertise here in  
10 saying they maybe have a reason for asking for  
11 more information here, just because this was an  
12 extraordinary action.

13 And to go back, reading the history  
14 and not really seeing what is it the institution  
15 did specific to their students and their programs  
16 does feel like -- by all other accounts, this is  
17 an Agency-based meeting.

18 All the things to have this one piece  
19 be tightened up doesn't seem unreasonable to me  
20 given the extraordinary nature of what happened.

21 CHAIR KEISER: Claude?

22 VICE CHAIR PRESSNELL: I want to go

1 back. I support Jennifer's evaluation of the  
2 motion.

3 I think especially when we look at  
4 these professional degrees, I'm thinking whether  
5 it be pharmacy, optometry, those types of things,  
6 those are typically very high-earning positions  
7 and the default rates are really indicative that  
8 the debt is corresponding to the wage earnings  
9 and it's not a huge burden.

10 I don't have a problem with them  
11 looking at it and I do understand why that's on  
12 theirs because they were deferring to some other  
13 associations to track that.

14 But I think it would be more  
15 appropriate as a comment to the vote rather than  
16 as a part of the motion.

17 CHAIR KEISER: Mary-Ellen?

18 M.E. PETRISKO: I would agree with  
19 that and I think we need to be really careful in  
20 looking across agencies and what we are and are  
21 not putting into the recommendations, looking  
22 over what we've done with agencies even within

1 this meeting.

2 I think it's better to just go without  
3 the encouragement here for the reasons that  
4 Jennifer noted and again, looking across agencies  
5 in what we're putting into the recommendations.

6 CHAIR KEISER: Bob, do you accept that  
7 or do you want to continue?

8 B. SHIREMAN: I'd like to keep it in,  
9 I don't think there's any problem with an  
10 encouragement and I'd like to keep it in the  
11 motion.

12 CHAIR KEISER: Further discussion?

13 Sensing none, the recommendation would  
14 be the motion is to remove the Agency's  
15 recognition as a nationally accredited Agency for  
16 five years and encourage the Agency to monitor  
17 student loan debt and postgraduate earnings.

18 Kathleen, do you have a comment?

19 K.S. ALIOTO: I agree with the comment  
20 that why do we put that in? I agree with the  
21 comment that we perhaps shouldn't be monitoring -  
22 -

1 CHAIR KEISER: Is that a no?

2 K.S. ALIOTO: -- that issue but I'm  
3 still voting yes. Put that comment in.

4 CHAIR KEISER: Roslyn?

5 R. ARTIS: I will vote no because of  
6 the comment.

7 CHAIR KEISER: Jennifer?

8 J. BLUM: No because of the comment.

9 CHAIR KEISER: Ronnie?

10 R. BOOTH: No because of the  
11 extraneous comment.

12 CHAIR KEISER: Wally?

13 W. BOSTON: Yes.

14 CHAIR KEISER: Jill?

15 J. DERBY: Yes.

16 CHAIR KEISER: David?

17 D. EUBANKS: Yes.

18 CHAIR KEISER: Michael?

19 M. LINDSAY: Yes.

20 CHAIR KEISER: Molly?

21 M. HALL-MARTIN: Yes.

22 CHAIR KEISER: Could you scroll up,

1 Monica, please?

2 J. BLUM: Nobody has been recording.

3 VICE CHAIR PRESSNELL: These need to  
4 be recorded.

5 CHAIR KEISER: I thought she was doing  
6 that, I'm sorry.

7 VICE CHAIR PRESSNELL: Nothing is  
8 happening.

9 CHAIR KEISER: Monica, are you there?  
10 I've got one absent.

11 S. Lagaard: This is Soren with OGC,  
12 we're in the room here. The phone unfortunately  
13 dropped so we'll be joining here shortly, just  
14 give us 30 seconds or so.

15 CHAIR KEISER: We'll have to re-vote  
16 then.

17 VICE CHAIR PRESSNELL: Mr. Chairman,  
18 I'm going to take advantage of this. Here we are  
19 jeopardizing the recognition of an accrediting  
20 body because of an extraneous comment. This is a  
21 very dangerous place for us to be in.

22 B. SHIREMAN: There's no danger here,

1       this is a recommendation to the SDO. The SDO can  
2       do whatever but it indicates our interest in the  
3       Agency and other agencies also monitoring student  
4       loan debt.

5               It's not endangering. If it gets  
6       voted down, we will have a next motion without  
7       the additional information.

8               CHAIR KEISER: Bob, if I could ask a  
9       question? Wouldn't we be able to say the same  
10      thing about every agency because obviously,  
11      student debt is a major issue?

12              B. SHIREMAN: A lot of agencies do  
13      monitor debt and earnings and this one does not.  
14      And this is, as was noted, a graduate program  
15      with very high debt.

16              (Simultaneous Speaking.)

17              CHAIR KEISER: Jennifer, do you have  
18      a comment?

19              J. BLUM: Under the regulations and  
20      under the statutes it's the Agency's prerogative  
21      to choose which outcome standards they use for  
22      student achievement. It's not our job to say you



1       should be doing this and not doing that.

2               Our obligation is to make sure they  
3       have the standard and that they're applying the  
4       standard that they have.

5               We can think whatever we want about  
6       debt and earnings and one thing that I don't love  
7       about this is I'm voting no because of your  
8       comment.

9               Of course, I care about debt and  
10       earnings but now the public somehow is going to  
11       think that I don't care about debt and earnings.  
12       Of course I care about debt and earnings and it's  
13       muddying the waters on how we feel about the  
14       agencies.

15              So, to me these are very worthwhile  
16       comments to be made if you want to make the  
17       comments during the discussion and as you vote,  
18       but to assign us and to put us into this  
19       predicament to me is a little bit manipulative of  
20       the process.

21              And so I would like to be able to  
22       support this Agency and its standard which it

1 does seem to be using appropriately but I'm  
2 forced into a vote of no because of an extraneous  
3 comment that's frustrating.

4 CHAIR KEISER: Roslyn?

5 R. ARTIS: I echo Jennifer entirely.

6 B. SHIREMAN: I will give in on this  
7 and I guess those of us, depending on whether my  
8 seconder will go along with it --

9 Z. SMITH ELLIS: Aren't we in the  
10 middle of the vote?

11 B. SHIREMAN: I guess we are.

12 CHAIR KEISER: We're not because they  
13 weren't taking our votes. We'd have to revote  
14 all the way again, which we can do.

15 Z. SMITH ELLIS: If no one was  
16 recording it, it --

17 (Simultaneous Speaking.)

18 CHAIR KEISER: We're not recording.

19 R. ARTIS: Welcome, Zakiya, welcome.

20 CHAIR KEISER: You want to pull that.  
21 Jill, do you agree with that?

22 J. DERBY: I agree with that.

1 CHAIR KEISER: The motion, which is  
2 the old motion but now modified is remove the  
3 Agency's recommendation as a nationally  
4 recognized accrediting agency for five years.

5 Kathleen?

6 K.S. ALIOTO: Yes, much better.

7 CHAIR KEISER: Roslyn?

8 R. ARTIS: Yes.

9 CHAIR KEISER: Jennifer?

10 J. BLUM: Yes.

11 CHAIR KEISER: Ronnie?

12 R. BOOTH: Yes.

13 CHAIR KEISER: Wally?

14 W. BOSTON: Yes.

15 CHAIR KEISER: Jill?

16 J. DERBY: Yes.

17 CHAIR KEISER: David?

18 D. EUBANKS: Yes.

19 CHAIR KEISER: Michael?

20 M. LINDSAY: Yes.

21 CHAIR KEISER: Molly?

22 M. HALL-MARTIN: Yes.

1 CHAIR KEISER: Robert?

2 R. MAYES: Yes.

3 CHAIR KEISER: Mary-Ellen?

4 M.E. PETRISKO: Yes.

5 CHAIR KEISER: Claude?

6 VICE CHAIR PRESSNELL: Yes.

7 CHAIR KEISER: Bob?

8 B. SHIREMAN: Yes, and I encourage the  
9 Agency to monitor student debt and earnings.

10 CHAIR KEISER: Well said. Zakiya?

11 Z. SMITH ELLIS: Yes, and encourage  
12 the Agency to monitor student debt and earnings  
13 and consider how transparent it is about the  
14 reasons for withdrawal and other adverse actions.

15 CHAIR KEISER: Steven?

16 S: Yes.

17 CHAIR KEISER: The motion passes.

18 We are at 1:08 p.m. approximately and  
19 I think it's too late to start a new agency so  
20 I'm going to suggest we take a little longer  
21 lunch today because I don't think we can do two  
22 agencies this afternoon.

1                   So, we'll get back on the schedule  
2                   when we return at 2:00 p.m., have a real lunch  
3                   today, not an abbreviated one like yesterday, and  
4                   we will return to deal with the Middle States  
5                   Commission on Secondary Schools.

6                   We're back on our regular schedule.  
7                   Back at 2:00 p.m. Eastern.

8                   (Whereupon, the above-entitled matter  
9                   went off the record at 1:09 p.m. and  
10                  resumed at 2:03 p.m.)

11                  Welcome back, everyone. We're  
12                  continuing our meeting. Before we start with the  
13                  next agency, Bob Shireman had a question on  
14                  procedure?

15                  B. SHIREMAN: During the kerfuffle  
16                  around my motion on the last agency, I had a  
17                  motion that some people did not like a piece of  
18                  it and I totally appreciate that they were put in  
19                  the awkward position of if they wanted to change  
20                  it, they had to vote down the entire thing making  
21                  it seem like they were opposed to the agency  
22                  being renewed at all.

1 I am not an expert on Robert's rules  
2 of order but my experience with Robert's rules of  
3 order would suggest that normally there would be  
4 a motion to amend the motion to remove the  
5 section so you could vote just on that piece.

6 But it is quite possible that it can  
7 be done in whatever way they recognize it.

8 CHAIR KEISER: We can do it either way  
9 but you have to actually remove the objection  
10 before we move to a vote.

11 B. SHIREMAN: I did but we had  
12 established in a prior session that we were going  
13 to do it by voting up or down on the entire  
14 thing. So, I just wanted to clarify that it  
15 might make --

16 CHAIR KEISER: There was a friendly  
17 amendment to the motion which was adopted by the  
18 person who made the motion and the second, so it  
19 became part of the motion, it was not a separate  
20 amendment.

21 B. SHIREMAN: People could have moved  
22 to remove it, is that right?

1 CHAIR KEISER: I think they could  
2 have, yes.

3 B. SHIREMAN: Thank you.

4 CHAIR KEISER: Now we're going to be  
5 looking at the Middle States Commission on  
6 Secondary Schools, MSA-CSS.

7 Our primary leaders are Kathleen  
8 Alioto and Claude Pressnell. Our Department  
9 Staff is Karmon Sims-Coates and I will turn this  
10 over to you, Kathleen and Claude.

11 K.S. ALIOTO: The Middle States  
12 Commission on Secondary Schools, MSA-CSS, is one  
13 of the three Commissions of the Middle States  
14 Association of college and schools.

15 Primarily an accreditor of secondary  
16 education institutions, the Agency also accredits  
17 post-secondary non-degree grantee vocational  
18 institutions.

19 These post-secondary institutions  
20 provide training and vocational technical careers  
21 within certificated and licensed professions such  
22 as automotive technology, computer working,

1       cosmetology, and practical nursing.

2               The Agency's current scope of  
3       recognition is for the accreditation of agencies  
4       with post-secondary non-degree-granting career  
5       and technology programs in Delaware, Maryland,  
6       New Jersey, New York, Pennsylvania, The  
7       Commonwealth of Puerto Rico, the District of  
8       Columbia, and the U.S. Virgin Islands, including  
9       Guam and those that offer all or part of their  
10      educational programs via distance education  
11      modalities.

12              The agencies federally link the Higher  
13      Education Act Tunnel 4 Federal Student Aid  
14      Program. Therefore, the Agency must meet the  
15      Secretary's separate and independent  
16      requirements.

17              Currently, the Agency accredits 58 post-  
18      secondary non-degree granting institutions, of  
19      which 7 are considered candidate institutions and  
20      27 institutions intend to use its accreditation  
21      to establish eligibility for Titel IV federal  
22      student aid programs.



1                   CHAIR KEISER: May the Staff make a  
2 report of comments, any from Ms. Coates? I  
3 don't see her. Here she comes, there she is.

4                   K. SIMMS-COATES: Yes, I'm here. Good  
5 afternoon.

6                   CHAIR KEISER: Could you turn your  
7 camera on, please?

8                   K. SIMMS-COATES: My camera should be  
9 on.

10                  CHAIR KEISER: It's not, is there  
11 somebody that can help you?

12                  G.A. SMITH: Patrick, is there  
13 something we can do here so Karmon Simms-Coates  
14 can be viewed? The camera appears to be on, is  
15 there a privacy filter?

16                  Z. SMITH ELLIS: If you have a laptop  
17 and you don't have the laptop open, it's going to  
18 the laptop camera.

19                  K. SIMMS-COATES: I'm sorry, you're  
20 right. You have to slide it over, I apologize.  
21 Good afternoon, Mr. Chair, and Members of the  
22 Committee.

1                   My name is Karmon Simms-Coates and I  
2                   am providing a review of petition for renewal,  
3                   recognition for the Middle States Commission on  
4                   Secondary Schools.

5                   The Staff recommendation to the senior  
6                   department official for the Agency is to renew  
7                   the Agency's recognition as a nationally  
8                   recognized accrediting agency subject to the  
9                   submission of a compliance report due in 12  
10                  months and a review and decision on the report.

11                  If recognition is continued following  
12                  a decision on the compliance report, the period  
13                  of recognition will not exceed five years from  
14                  the due date the decision of renewal of  
15                  accreditation is issued by the senior department  
16                  official.

17                  This recommendation is based on a  
18                  review of the Agency's petition and is supporting  
19                  documentation as well as three virtual  
20                  observations, a site visit, Board Meeting, and  
21                  file review.

22                  The Agency's compliance report must

1 address two remaining issues. Under 60221B4 the  
2 Agency must provide documentation to demonstrate  
3 that it gave constituents an opportunity to  
4 review and provide input during the comprehensive  
5 review of standards.

6 And the Agency must also establish a  
7 policy that complies with requirements of 602.21C  
8 and 602.21D3 and provide documentation  
9 demonstrating the application of his policies for  
10 those sections.

11 The Department received one  
12 third-party comment, however, the Department did  
13 not receive any complaints during the recognition  
14 period. This concludes my presentation.  
15 Representatives of the Agency are here today to  
16 respond to your questions, thank you.

17 CHAIR KEISER: Questions for the Staff  
18 at this point? Kathleen? Do you have a question  
19 for the Staff?

20 K.S. ALIOTO: I just wondered, the  
21 financial factors that you've presented in the  
22 presentation made my stomach kind of knot up that

1 it isn't financially stable enough for us to  
2 continue or to help them enlarge their  
3 accreditation services.

4 CHAIR KEISER: We can ask the  
5 Commission about that, Kathleen.

6 K.S. ALIOTO: It's the actual  
7 documents that you presented in the proposal.

8 CHAIR KEISER: Let's go to the Agency  
9 then and we can ask them about that, your you can  
10 certainly. Representing the Agency, I'll  
11 introduce Mr. Christian Talbot, who's the  
12 President of MSA-CSS.

13 And if you would introduce those who  
14 are with you today and make your comments as it  
15 regards to your petition?

16 C. Talbot: Thank you, Mr. Chair, Ms.  
17 Alioto, Ms. Simms-Coates, and to Members of the  
18 NACIQI Committee for welcoming us today. I am  
19 very pleased to represent the Middle States as  
20 the new President.

21 I just joined July 1st so I'm still  
22 getting my feet wet and I am here today in the

1 same room with our Executive Vice President, Dr.  
2 Glenn Mort and Mr. Dan Ruffo, who is one of our  
3 Assistant Vice Presidents of accreditation.

4 And in a separate screen you can see  
5 Dr. Jim Kraft, who is the Chair of the Middle  
6 States Association Commission on Secondary  
7 Schools. Dr. Kraft will share some opening  
8 statements.

9 J. KRAFT: Hello, everyone, I'm Dr.  
10 James Kraft, Chair of the Secondary Commission  
11 for the Middle States Association of colleges and  
12 schools.

13 And again, today with me is again Mr.  
14 Christan Talbot, who is our new President, Dr.  
15 Glen Mort, Executive Vice President, and Mr. Dan  
16 Ruffo, Associate Vice President, who are in  
17 charge of the accreditation and coordinating the  
18 accreditation of our post-secondary non-degree-  
19 granting career institutions.

20 And we appreciate the opportunity to  
21 speak with all of you today regarding our success  
22 as a Titel IV gatekeeper and our petition for

1 reauthorization. Since nearly 1900,  
2 accreditation has held a major impact in the  
3 field of American education.

4 Accreditation response to the public's  
5 demands for improved quality and greater  
6 accountability for institutions serving society  
7 needs. Accreditation agencies enjoy a unique  
8 public trust role in the United States.

9 In other words, accredited schools can  
10 be trusted by the public to be what they claim to  
11 be and do what they claim to do.

12 Whatever an accredited school says  
13 about itself has both the sanction and the  
14 confidence of its profession.

15 Accreditation rests on the dual  
16 concepts of self-regulation and quality  
17 improvement. A given field such as education  
18 uses its own experts to define standards of  
19 acceptable operations and performance for the  
20 institutions and organizations within.

21 Thus, accreditation refers to a  
22 standard-setting annual review process.

1 Accreditation of an educational organization is  
2 an affirmation that the institution provides a  
3 quality of education that the community has a  
4 right to expect and the educational world  
5 endorses.

6 Accreditation is a means of showing  
7 confidence in an institution's performance.

8 When a Commission accredits an  
9 educational institution, it is certifying that  
10 the organization has met the prescribed  
11 qualitative and quantitative standards of the  
12 Commission within the terms of the organization's  
13 own stated philosophy and objectives.

14 Accreditation is granted on an  
15 institution-wide basis, not just one program or  
16 course offering. Since our renewal in 2017, the  
17 range in volume of our accreditation activities  
18 has remained the same.

19 MSA-CSS accredits 69 post-secondary  
20 non-degree-granting institutions, 47 of which  
21 participate in Title IV.

22 Of these 47 institutions, 19 are

1 small, private, for-profit career schools and we  
2 currently have 32 institutions in candidacy  
3 status for accreditation, 19 of which have a  
4 desire to participate in Title IV.

5 So, as you can see, we are planning on  
6 expanding our services. Early first actions have  
7 been taken since the renewal of our petition and  
8 overall, we have experienced favorable reports  
9 resulting from the accreditation protocol used by  
10 these institutions.

11 We also received and acted upon  
12 requests for substantive F change from our  
13 accredited institutions regarding addition,  
14 deletion, and changes to certificate programs in  
15 addition to discontinuation of campus locations.

16 Regarding standards and practices used  
17 by MSA-CSS to address student achievement, MSA-  
18 CSS requires all institutions to be in compliance  
19 with the indicators of quality identified for  
20 career and technology institutions for our 12  
21 standards for institutional quality.

22 Additionally, the MSA has set program-



1 level thresholds for completion rates, licensing  
2 pass rates, and job placement rates at 70  
3 percent. In our context as a national  
4 accreditor for non-degree-granting post-secondary  
5 career institutions, this rate is based on  
6 purpose requirements, as proven reasonable to  
7 support consistent expectations for success with  
8 respect to student achievement.

9 Our accredited institutions find that  
10 these expectations are challenging but  
11 appropriate.

12 We just completed a five-year process  
13 to update and revise our standards along with the  
14 template for our protocol to make the materials  
15 more user-friendly.

16 And we'll roll out the protocol on an  
17 online platform later this year.

18 The challenge we most frequently see  
19 regarding student performance is the lack of  
20 supporting documentation provided by institutions  
21 to demonstrate compliance at the time of the  
22 onsite evaluation, specifically regarding job

1 placement rates.

2 In our experience low job placement  
3 rates are often a function of the lack of  
4 effective strategies at the institution, provide  
5 documented evidence on the employment of program  
6 completers.

7 This results in monitoring issues in  
8 MSA-CSS requires institutions to demonstrate  
9 compliance with the threshold in their annual  
10 reports or submit improvement plans for any  
11 program that's out of compliance.

12 MSA-CSS takes pride in the fact that  
13 our accreditation protocol and reporting  
14 requirements serve as tools for continuous  
15 improvement and it's been our practice to work  
16 with institutions to identify gaps and student  
17 performance and to share current strategies and  
18 activities to elimination those gaps.

19 Our evaluation process, based on peer  
20 review and our annual reporting requirements  
21 reviewed by our Staff, reinforce the continuous  
22 improvement model.

1                   The monitoring process is in place,  
2                   annual documentation of the student performance  
3                   rates assisting the institution with  
4                   identification appropriate strategies and  
5                   activities to improve the rates and requiring  
6                   program-specific improvement plans.

7                   It has worked well in correcting any  
8                   issues related to student achievement that have  
9                   been identified through an onsite evaluation or  
10                  in the annual data provided by the institutions  
11                  for Staff review.

12                  Currently, MSA-CSS does not identify  
13                  any of our accredited post-secondary non-degree  
14                  granting career institutions at risk.

15                  MSA-CSS monitors not only student  
16                  performance rates and loan default rates but  
17                  institutional viability and financial stability  
18                  by requiring an accredited institution to submit  
19                  annual enrollment reports and independent audit  
20                  reports.

21                  MSA-CSS would identify an institution  
22                  at risk if aggregate student performance data

1 consistently falls below the established  
2 threshold or if the enrollment or financial  
3 reports indicate instability.

4 If such cases were to arise, MSA-CSS  
5 would employ the success of our current practice  
6 working with institutions to identify appropriate  
7 remedies requiring improvement plans and  
8 monitoring in annual progress.

9 Failure to demonstrate improvement  
10 would make the institution be placed on a  
11 probationary status.

12 Although MSA-CSS accredits only a  
13 small number of post-secondary non-degree-  
14 granting institutions in our region for Title IV  
15 purposes, our member schools appreciate the rigor  
16 of the protocol and find that obtaining and  
17 maintaining Middle States accreditation is  
18 invaluable in supporting their mission and in  
19 providing our own process for data-driven  
20 decision-making that engages all stakeholders,  
21 and continuous improvement to support the  
22 intended outcomes of student achievement.

1                   We appreciate the opportunity to be of  
2                   service to these institutions and to the U.S.  
3                   Department of Education and hope that you look  
4                   favorably on this service for approving our  
5                   petition for reauthorization.

6                   Finally, we would like thank Ms.  
7                   Karmon Simms-Coates, our Staff analyst, along  
8                   with Mr. Herman Bounds and their entire team for  
9                   their support and tireless work on behalf of  
10                  Middle States and our member institutions.

11                  Thank you.

12                  CHAIR KEISER: Questions from the  
13                  primary readers, Kathleen, Claude?

14                  VICE CHAIR PRESSNELL: You go,  
15                  Kathleen, I'll follow up.

16                  K.S. ALIOTO: First of all, you just  
17                  said that there are 32 new institutions that want  
18                  to become part of you.

19                  Where are those institutions now and  
20                  why have they chosen to go to you rather than  
21                  staying where they are?

22                  J. KRAFT: I'm going to defer it this

1 time to Dr. Mort, our Executive Vice President,  
2 to comment on the current technical schools and  
3 the fabulous work he's been doing to have them  
4 come in the fold of Title IV or designed to be  
5 Titel IV.

6 G. MORT: Thank you, Dr. Kraft and  
7 Kathleen, for that question. Unfortunately, I  
8 don't have at my disposal where all those 30-plus  
9 schools are coming from.

10 I will tell you that historically,  
11 that's an approximate amount of schools that we  
12 have reaching out to us on an annual basis. So,  
13 that number is not out of the ordinary for us.

14 If I could just kind of pat myself or  
15 ourselves on the back here a little bit I can  
16 tell you that schools do seek us out because of  
17 our long tenure and our reputation. If you have  
18 a more specific question that maybe I can answer  
19 I'd be more than happy to do so.

20 K.S. ALIOTO: I would like to know,  
21 you went from being regional and I first saw  
22 Middle States I was assuming that we were going

1 to be dealing with institutions in Ohio and the  
2 Midwest.

3 But you have recently -- when did you  
4 actually become a United States accreditor rather  
5 than a regional accreditor?

6 G. MORT: It happened shortly after  
7 Secretary DeVos made the decision to strip away  
8 the geographic areas, so we submitted that  
9 information to Mr. Bounds and his team and that's  
10 when we opened the Agency to obtain app locations  
11 from outside of our lower piece region.

12 K.S. ALIOTO: Although you don't know  
13 where these schools are coming from, they could  
14 be coming from any place in the country or in the  
15 Virgin Islands? All that you don't know, could  
16 somebody come up with that?

17 G. MORT: My colleague, Mr. Rufo, may  
18 have some more specific information.

19 D. Rufo: A lot of the schools that  
20 we've been working with recently are coming out  
21 of Florida, Virginia, and I have two in Texas  
22 right now.

1 K.S. ALIOTO: What is the default way  
2 that you -- what is the red line of loan default  
3 has occurred with one of your institutions, what  
4 is your cut-off from that since you say that no  
5 school has had a problem?

6 G. MORT: We follow the Department's  
7 protocol on that so during the annual report, we  
8 ask the school to report to us if they have had  
9 any findings from the department.

10 K.S. ALIOTO: I see, it's not you as  
11 accreditors who are looking at that, you're  
12 depending on the Department to do that?

13 G. MORT: We do look at it on an  
14 annual basis but it is part of the external audit  
15 that we look at and then we confirm that with the  
16 institution.

17 K.S. ALIOTO: So, if the Department of  
18 Education highlights any of your institutions as  
19 having problem in that area, then you address  
20 that point, rather than being proactive?

21 G. MORT: During the annual report,  
22 during the desk audit of the annual report, if



1 the associated Vice President sees that there is  
2 a consistent number that's fairly high, it will  
3 be addressed with the school.

4 K.S. ALIOTO: And how often has that  
5 happened?

6 G. MORT: I have not had any and Mr.  
7 Rufo is shaking his head so neither one of us  
8 have had any institutions that have fallen into  
9 an at-risk category.

10 K.S. ALIOTO: If you turn to Exhibit  
11 12 in the report, have you had an audit since  
12 2019?

13 G. MORT: We have, we have an annual  
14 audit done our organization every year.

15 K.S. ALIOTO: So, that audit is not  
16 part of our record so the audit, which said that  
17 you were okay, according to the audit in 2019 but  
18 the exhibits which indicate financial concerns I  
19 wondered what had happened.

20 You had some concerns in 2018, 2019  
21 and with COVID-19 in 2020 and I'm wondering in  
22 2021, is that your latest audit?

1 G. MORT: Yes, we are just about to  
2 enter 2021's audit so 2020 would be the last year  
3 that we had a full audit.

4 K.S. ALIOTO: That wasn't included in  
5 the documents but what you said in Exhibit 12 is  
6 investments are recovering and the limited  
7 availability of mail access hampered the  
8 depositing of cash flows.

9 What does that mean?

10 G. MORT: I'm going to have to defer  
11 a little bit on this question only because our  
12 finances were handled by our previous president  
13 and as you can see from Mr. Talbot's presence  
14 here in the room, Dr. Macoli is no longer  
15 president of the organization.

16 I will tell you that we have put in  
17 place since 2019 several new ways for schools to  
18 make dues payments towards us. No longer do they  
19 need to necessarily write a check and send it to  
20 us.

21 A lot of this can be done  
22 electronically through the lock box at the bank

1 through wire transfers and other avenues. So, I  
2 will tell you in the past two years I have not  
3 seen an obstacle to schools paying their dues.

4 K.S. ALIOTO: You also indicated in  
5 2012 that your budget had decreased \$150,000 due  
6 to school closings, 15 so far and more to follow.  
7 But you had 20 new schools in the pipeline  
8 seeking approval.

9 That gave me cause for concern.

10 G. MORT: If you remember back during  
11 that time, we had several natural disasters, some  
12 of which were in Puerto Rico, some of which were  
13 down in the United States Virgin Islands, which  
14 affected quite a few schools that needed to close  
15 during that time.

16 I will tell you that none of those  
17 were career and technical schools that would  
18 utilize us for gatekeeping for Title IV. These  
19 were all on the secondary side of the Commission.

20 K.S. ALIOTO: We also want to talk  
21 about writing off bad debts. What were those  
22 debts?

1                   G. MORT: That's where accumulated  
2 over a few years and that schools just did not  
3 pay their dues over a certain period of time.

4                   Our previous president made the  
5 decision that she was going to try to eliminate  
6 that debt at that time and gave those schools an  
7 opportunity to pay any outstanding dues, those  
8 that did not we removed from our membership ranks  
9 and that's the reason why that particular year  
10 there was a spike in dues that were written off.

11                  Kathleen, I didn't want to interrupt,  
12 none of those schools were post-secondary non-  
13 degree granting career and technical schools.  
14 They were, again, all on the secondary side.

15                  K.S. ALIOTO: It was natural  
16 disasters rather than anything else that caused  
17 all those colleges to close or institutions?

18                  G. MORT: That's correct.

19                  K.S. ALIOTO: They're not but they  
20 were.

21                  G. MORT: That's correct.

22                  K.S. ALIOTO: So, then we come to

1 Exhibit 25. It indicates that investments came  
2 in June. You invest your portfolio. What is  
3 that about?

4 G. MORT: Whenever we have a surplus,  
5 which we have had for the past several years, we  
6 do take that money and invest it into investment  
7 accounts.

8 K.S. ALIOTO: Was that a common  
9 practice? Is that common practice among the  
10 industry?

11 G. MORT: We've been doing it as long  
12 as we've been granted accreditation by you guys  
13 and probably before that.

14 K.S. ALIOTO: Then you said the PPP,  
15 the saving grace, was the COVID-19 relief fund  
16 and you were going to seek loan forgiveness on  
17 that. Did you get loan forgiveness on that?

18 G. MORT: We did apply for the PPE  
19 loan. We were granted that loan and we also  
20 applied for forgiveness and we were granted  
21 forgiveness.

22 K.S. ALIOTO: How much was that loan?

1 G. MORT: It was \$354,000.

2 J. KRAFT: There was one other major  
3 cost savings during that time. Middle States  
4 does accreditation in over 100 countries, there's  
5 a lot of travel but during the COVID-19 era the  
6 travel was curtailed.

7 So, there was a huge savings as well  
8 that was part of that financial report or should  
9 be part of the financial report for 2020 and  
10 2021.

11 K.S. ALIOTO: They would see that?

12 J. KRAFT: Yes, correct.

13 K.S. ALIOTO: I hope you can  
14 understand my sense of uneasiness when I was  
15 reading those exhibits but perhaps, Claude, do  
16 you have some other question sit down him?

17 VICE CHAIR PRESSNELL: Yes, I  
18 certainly do, thanks Kathleen. Those were good  
19 questions. I want to get to the finding right  
20 away. You had mentioned there was going to be  
21 enough data, the standards.

22 Obviously the compliance

1 issue deals with providing opportunity for your  
2 member institutions to actually weigh in and have  
3 comment on those.

4 Could you talk to the deficiency in  
5 how you plan to overcome that?

6 G. MORT: Absolutely, Claude, thank  
7 you for the opportunity to address that.

8 We work very closely with our analysts  
9 on this particular finding and I think it's  
10 important that we spend just a couple of minutes  
11 and I can walk you all through what that process  
12 was and what we're going to do to improve that  
13 process moving forward.

14 But we started our standard review  
15 process literally five years ago. It started  
16 with Staff, we met as a Staff to take a look at  
17 our current standards with really no direction in  
18 mind.

19 We just took a white board and said  
20 what's working for us, what's not working for us  
21 and started at that stage.

22 Then what we did is we reached out to

1 some of our cooperative partners and some of the  
2 other agencies that we are friendly with and took  
3 a look at what they were doing, shared what we  
4 were doing and asked them to take a look at what  
5 we were doing.

6 And we received comments back from  
7 those folks at that time. From there what we did  
8 is we put together many different focus groups  
9 that consisted of different characteristics of  
10 our membership.

11 That included the current impact role,  
12 that included residential programs, it included  
13 early education programs. So, we took a lot of  
14 time to take a look these special purpose areas  
15 that affects us.

16 From there what we did was we put  
17 together a small pilot group of 13 schools,  
18 correction, 13 organizations with 12 schools to  
19 take a look our new standards.

20 We actually asked them for feedback  
21 over a period of about 9 months. We met with  
22 them on three different occasions to talk about



1       what we were proposing.

2               They gave us feedback at that point.

3       Immediately, we took that feedback and put it  
4       right back into the document. So, as we received  
5       that feedback, it was immediately updated.

6               From there, we asked that same group  
7       of 12 schools to actually go through the entire  
8       process.

9               We put them through a self-study  
10       process, posted a visiting team, and we received  
11       feedback from the school, we received feedback  
12       from the visiting team and again, updated that  
13       document.

14              Where we realized in working with the  
15       Department that we should have done is also  
16       opened that up to public comment.

17              So, what we did in response to that  
18       conversation that we had with our analyst was on  
19       our website today folks can go to the career and  
20       technical page, click on it, and provide us with  
21       feedback on our standards anytime.

22              The second thing we did was we

1 realized that the policy that we currently have  
2 in place did not include the public members being  
3 able to comment.

4 So, at a recent Executive Committee  
5 meeting about a month or so ago, we actually  
6 updated that policy to state that we would  
7 receive public feedback as well.

8 So, we thought it was a very  
9 comprehensive process and we were thrilled to get  
10 the feedback from Karmon and her team to include  
11 the update to the policy and to update the  
12 ability for folks to provide comments on your  
13 website.

14 VICE CHAIR PRESSNELL: One, have you  
15 formalized that process? And two, is there ever  
16 an opportunity for all your member institutions  
17 to review and to comment?

18 G. MORT: Thank you, Claude, I can't  
19 believe I skipped over that. Yes, absolutely.

20 It was towards the beginning of that  
21 process as we started to codify some of the new  
22 standards. We did send that out to all of our

1 members and allow them to provide us with  
2 feedback as well.

3 We also ask our Commissioners and we  
4 also ask the Members of our Advisory Committees  
5 to take a look at that as well. Thank you for  
6 putting that out.

7 VICE CHAIR PRESSNELL: Did the pilot  
8 group, do you feel like they were representative  
9 of your full membership?

10 G. MORT: Yes.

11 VICE CHAIR PRESSNELL: That helps. If  
12 so, have you formalized this process into a  
13 policy?

14 G. MORT: We formalized this into a  
15 process that will align with the policy that we  
16 have in place.

17 VICE CHAIR PRESSNELL: That sounds  
18 good.

19 A few other questions, it sounded  
20 like, based on your comments, that institutions  
21 that are at the secondary level versus post-  
22 secondary level tend to be more fragile if you

1 will or may close more abruptly than those that  
2 are in the post-secondary space?

3 Is that accurate? And if it is, can  
4 you talk about the fragility of the secondary  
5 institution versus the post-secondary?

6 G. MORT: I've never heard it put that  
7 way but absolutely, you are correct. I will tell  
8 you that the private secondary schools, we do  
9 accredit.

10 They tend to be a little more, to use  
11 your word, fragile and at the post-secondary  
12 level because of the strong vetting process that  
13 we go through to bring folks into Middle States  
14 at the candidacy level.

15 We make sure that they're extremely  
16 financially viable even before they obtain an  
17 offer of candidacy. They're not even going to  
18 become part of our membership without showing  
19 that they have that financial ability to do so.

20 VICE CHAIR PRESSNELL: You had  
21 mentioned or it was mentioned, 70 percent, I  
22 think a 70 percent placement range is a

1 requirement, how did you derive the 70 percent  
2 mark?

3 G. MORT: That goes back several  
4 years. We basically just decided at that time to  
5 use the Perkins model. It works quite well so we  
6 adopted the Perkins model at 70 percent, we put  
7 that out to our members.

8 We're going back probably 10 or 12  
9 years, maybe even longer, receive that feedback  
10 from our member institutions say yes, we're  
11 comfortable with 70. Full disclosure, many of  
12 them said let's drop it to 60 and we said no.

13 But that's been the model that would  
14 have been using now for probably a dozen or 15  
15 years. Claude, that 707070 rule that we call it  
16 is 70 percent completion, 70 percent licensing,  
17 and 70 percent placement. That's where we draw  
18 the line in the sand.

19 G. MORT: There's not a lot of  
20 accrediting bodies that have line standards  
21 anymore so that's interesting that you still do  
22 that.

1                   Another question I have deals with the  
2                   Title IV eligible institutions and looking at  
3                   student debt, and particularly the default rate.  
4                   What are the institutional characteristics of  
5                   those who carry larger default rates?

6                   VICE CHAIR PRESSNELL: If I'm looking  
7                   at the dashboard statistics that you're probably  
8                   addressing, yes, if I was to look at the  
9                   accreditation dashboard, those are going to be  
10                  primarily public schools that opened their doors,  
11                  for example, for nursing programs or something  
12                  along those lines.

13                  I would have to really dig into those  
14                  numbers but quite a few of them are -- quite a  
15                  small amount of those are going to be those  
16                  private for-profit institutions.

17                  G. MORT: I think that answers most of  
18                  my questions, Mr. Chairman, if you want to open  
19                  it up.

20                  CHAIR KEISER: Questions from the  
21                  Committee?

22                  K.S. ALIOTO: I have one more.

1 CHAIR KEISER: Go ahead, it's still  
2 your floor.

3 K.S. ALIOTO: Does it cost \$10,000 to  
4 become a member? Because you had said that you  
5 were losing \$150,000 and there were 15 schools  
6 closing. Does it cost \$10,000 each?

7 G. MORT: It doesn't, our dues and  
8 fees schedule is quite abundant. It's going to  
9 depend on the number of students that enroll in  
10 the school, it's going to depend on the  
11 characteristics of the school.

12 But I will tell you it's not going to  
13 be in that \$10,000 range, it's going to be a lot  
14 lower than that.

15 CHAIR KEISER: If I may follow up on  
16 that, when you were at Commission, one of the  
17 Commissions of the Middle States Association I  
18 assume because you even introduce yourself as the  
19 Middle States Association of Colleges and Schools  
20 if this is the secondary Commission.

21 You do not do a separate financial  
22 audit from the parent organization?

1                   G. MORT: Thank you for that question.  
2                   We probably should have clarified this a little  
3                   bit better.

4                   We used to fall under the umbrella of  
5                   the Middle States Association and that included  
6                   the higher ed Commission, the secondary  
7                   Commission, and the elementary Commission.

8                   We are now two totally distinct and  
9                   separate organizations, we no longer have a  
10                  parent organization. Our parent organization is  
11                  the Middle States Association of Colleges and  
12                  Schools.                   The higher Ed Commission, we  
13                  allow them to still utilize our name if they so  
14                  choose but we are no longer under the auspice of  
15                  that parent organization. We are separate and  
16                  distinct.

17                  CHAIR KEISER: So, your corporation is  
18                  Middle States Colleges and Schools but you  
19                  operate under your recognition of secondary  
20                  schools.

21                  G. MORT: That's correct. We're the  
22                  Middle States Association of Colleges and Schools



1 and we're in front of you today with just one of  
2 our Commissions, which is the Commission on  
3 secondary schools.

4 CHAIR KEISER: Are other Commissions  
5 within the organization?

6 G. MORT: There is one other  
7 Commission and that is the Commission on  
8 elementary schools.

9 CHAIR KEISER: Have they broken out  
10 financial statements or is that a combined  
11 financial statement for the total corporation?

12 G. MORT: You're counting that, Mr.  
13 Chair, as of today we are one audit and one  
14 budget. Back in 2019 we might have still been  
15 split between the elementary and the secondary  
16 Commission.

17 CHAIR KEISER: How would we know the  
18 financial stability of the Commission we are  
19 recognizing if they're combined with another  
20 Commission?

21 G. MORT: It's all one and the same.

22 CHAIR KEISER: If you're including the

1 elementary school recognitions, you're not. You  
2 have two Commissions within the group, the  
3 secondary and element, your one corporation you  
4 have a similar audit. I don't think you break it  
5 out.

6 At least, in the audit it did say  
7 there are multiple Commissions within the  
8 organization. So, how do we know the Commission  
9 that we're recognizing today is financially  
10 responsible?

11 D. Rufo: If I may, we operate as one  
12 organization. The Commission you are looking to  
13 recognize and we're hoping you will recognize is  
14 responsible for secondary and post-secondary  
15 schools.

16 So, when the schools come through,  
17 they're responsible for the accreditations, the  
18 decisions and so forth but because there is the  
19 elementary Commission as well, their  
20 responsibility is just the elementary schools.

21 They combine together to form the  
22 Commission on Elementary and Secondary Schools,

1 which is what the budget is referencing to.

2 CHAIR KEISER: Okay, but in here it  
3 says the Commission on Secondary Schools, not  
4 Elementary and Secondary Schools. I'm just  
5 confused as to who is what and what are the  
6 audits reflecting.

7 And if, let's say, the  
8 elementary school is doing great but the  
9 secondary sized schools are not doing -- that  
10 group is not putting the money into it, we would  
11 not know, would we?

12 G. MORT: Mr. Chairman, we don't look  
13 at the schools as individual Commissions. The  
14 accreditation action is taken at that level but  
15 the revenue coming in goes to Middle States  
16 Association of Colleges and Schools' Commissions  
17 on Elementary and Secondary Schools.

18 CHAIR KEISER: I'm sorry, I took too  
19 much time. Questions from the Committee?

20 (Simultaneous Speaking.)

21 VICE CHAIR PRESSNELL: I will have one  
22 last --

1                   CHAIR KEISER: Raise your hand, Wally,  
2                   You're welcome, because I can see your hand.  
3                   There's Claude too.

4                   VICE CHAIR PRESSNELL: You see my  
5                   hand?

6                   CHAIR KEISER: I did not, now I do.  
7                   So, Wally, Claude, and then Bob, how about that?

8                   W. BOSTON: I think this is a question  
9                   for the General Counsel. I'm confused, I don't  
10                  know that we've had two agencies that are part of  
11                  one corporate shell.

12                  Art, I actually got where you were  
13                  going, which is what if the secondary schools  
14                  don't support this, they think it's losing too  
15                  much money.

16                  Although, at the same time, I'm not  
17                  sure that we have any precedent to look at it  
18                  from almost a cost accounting allocation  
19                  perspective, so I'm wondering if the General  
20                  Counsel has any advice for us.

21                  G. MORT: There's no attorney in the  
22                  room so I will try to answer your question. Are

1       you asking your General Counsel or ours?

2                   CHAIR KEISER:   Our General Counsel.

3                   (Simultaneous Speaking.)

4                   A. SIERRA:   This is Angela Sierra from  
5       the Office of the General Counsel.   I'm not sure  
6       whether the accreditation group Staff considered  
7       that.

8                   I'm not prepared to really answer the  
9       question from a legal standpoint right now off  
10      the top of my head.   So, I'm not sure if anybody  
11      else has comments.

12                  J. KRAFT:   Hello again, everyone, Jim  
13      Kraft. One important point would be that we have  
14      a joint Commission and all of the votes from the  
15      Commissioners are handled first by their  
16      individual Commissions and then it comes before  
17      the Joint Commission.

18                  So, if one person makes a motion we  
19      hear first elementary and then we hear a second  
20      by a Commissioner from the secondary.   So, there  
21      is an accountability in checks and balances  
22      between the two.

1                   And the same with Staff, we don't  
2                   divide the Staff or any of the bills, the  
3                   operating costs of Middle States by elementary  
4                   and secondary. It's always been that way, it's  
5                   been one joint process and one joint Commission  
6                   and the policies are all the same too.

7                   There aren't separate policies for  
8                   elementary and secondary, they're all handled  
9                   through the joint operation.

10                  G. MORT: Just a couple things to add  
11                  to what Dr. Kraft was saying, with respect to  
12                  policies, we do have additional policies in place  
13                  for our career and technical schools. That would  
14                  be in addition to the other policies that we have  
15                  already in place.

16                  But I think it's important to know  
17                  that for the past several years, Middle States  
18                  has had a surplus and to be quite honest with  
19                  you, I'm a little surprised that this was in  
20                  front of us today only because we are very  
21                  financially sound with quite a robust investment  
22                  portfolio as well as our accounts in the bank.

1 CHAIR KEISER: You've got to choose  
2 loss and operations.

3 G. MORT: That was the last year that  
4 we were in the red.

5 CHAIR KEISER: That's all we had.  
6 Wally, questions? Bob?

7 B. SHIREMAN: On this financial issue  
8 I'm not at all concerned about your finances. I  
9 did want to clarify, I think there are a lot of  
10 Commissions that have various operations that are  
11 not 100 percent about their higher ed  
12 accreditation.

13 But if for the purposes of the  
14 elementary Commission you took on a large  
15 liability that turned out to have been a poor  
16 decision to have made, I assume that liability  
17 would affect the whole organization and it would  
18 be something that we should be concerned about  
19 with regards to the secondary operation, even if  
20 it happened in the context of your elementary.

21 Is that right? Is that what you mean  
22 by your one overall organization?

1 G. MORT: That's exactly right, Bob.

2 CHAIR KEISER: Claude?

3 VICE CHAIR PRESSNELL: Beyond, I  
4 appreciate that statement because I think we've  
5 noticed in the last Agency we approved, the  
6 pharmacy does more than just the Title IV piece,  
7 they do a lot of different things as well.

8 I'm going to pivot a little bit and  
9 ask whether or not -- I notice on the review, at  
10 the very beginning the first review there were a  
11 lot of non-compliance pieces and you were able to  
12 get those into compliance except for the two  
13 citations that we've got here.

14 Talk to us a little bit, is that  
15 largely because of the change in the standards  
16 and how does that transition work for all of you?  
17 Can you speak a little bit to the a lot of non-  
18 compliance and then you were able to become  
19 compliant?

20 G. MORT: Thank you for that question.  
21 I'm going to be very transparent here and Ms.  
22 Sims-Coates can attest to this. We initially



1 sent in our initial submission, that was done by  
2 the previous president and by the previous  
3 president alone.

4 No other individuals worked on that  
5 report to the detriment of you guys getting that  
6 report. We tried several times to get other  
7 individuals to work with her on that submission.

8 She felt it was her responsibility and  
9 her responsibility alone.

10 After her departure, I took on the  
11 responsibility along with my colleague, Mr. Rufo,  
12 and what we found by going through that process  
13 was what she originally submitted was incorrect  
14 information and we corrected it immediately.

15 So, to answer your question, a lot of  
16 what was out of compliance we got in compliance  
17 with providing the Department the correct  
18 information.

19 G. MORT: Congratulations on making  
20 the adjustments in short order.

21 VICE CHAIR PRESSNELL: I'm sweating.  
22 That's all I had, Mr. Chairman.

1 CHAIR KEISER: Herman, do you have a  
2 comment?

3 H. BOUNDS: I did but I think  
4 everybody has pretty much settled on the  
5 financial issue.

6 I was going to say that the agency has been  
7 recognized under this structure for quite some  
8 time and we've had a long look to take a look at  
9 the Agency's finances and we thought they were  
10 adequate.

11 But I think it sounds like everybody  
12 has settled on that issue now so I don't have  
13 anything to add.

14 CHAIR KEISER: I don't see anymore  
15 hands, that's good. Thank you very much, will  
16 the staff person add to your observations?

17 K. SIMMS-COATES: I have no comments.

18 CHAIR KEISER: We'll go to the primary  
19 readers. Kathleen and Claude, entertain the  
20 motion.

21 K.S. ALIOTO: Do you want to make the  
22 motion?

1                   VICE CHAIR PRESSNELL: I'd be happy  
2 to.               I move that NACIQI recommend  
3 that the senior department official grant Middle  
4 States continued recognition with the required  
5 compliance report to be submitted to the  
6 Department within 12 months from the decision of  
7 the SDO.

8                   Is there a second?

9                   J. DERBY: I'll second the motion.

10                  CHAIR KEISER: Discussion? We had  
11 that on the last one. No more discussion so  
12 we'll call for a vote. Kathleen?

13                  K.S. ALIOTO: No.

14                  CHAIR KEISER: Roslyn?

15                  R. ARTIS: Yes.

16                  CHAIR KEISER: Jennifer?

17                  J. BLUM: Yes.

18                  CHAIR KEISER: Ronnie?

19                  R. BOOTH: Yes.

20                  CHAIR KEISER: Wally?

21                  W. BOSTON: Yes.

22                  CHAIR KEISER: Jill?

1 J. DERBY: Yes.

2 CHAIR KEISER: David?

3 D. EUBANKS: Yes.

4 CHAIR KEISER: Michael?

5 M. LINDSAY: Yes.

6 CHAIR KEISER: Molly?

7 M. HALL-MARTIN: Yes.

8 CHAIR KEISER: Robert?

9 R. MAYES: Yes.

10 CHAIR KEISER: Mary-Ellen?

11 M.E. PETRISKO: Yes.

12 CHAIR KEISER: Claude?

13 VICE CHAIR PRESSNELL: Yes.

14 CHAIR KEISER: Bob?

15 B. SHIREMAN: Yes.

16 CHAIR KEISER: Zakiya?

17 Z. SMITH ELLIS: Yes.

18 CHAIR KEISER: Steven? Are you still

19 with us? I guess he's not here. I don't see

20 him. We have a quorum and the motion passes.

21 Thank you very much, Members of the Middle State

22 Commission on Secondary Schools.

1 (Simultaneous Speaking.)

2 It is 3:00 p.m. We have a choice, we  
3 could take the afternoon off, are the people from  
4 ABA here, George?

5 G.A. SMITH: They should be. They are  
6 standing by, she can send an email if you wanted  
7 them too. All agencies, especially those on the  
8 following day are notified early on before the  
9 meeting begins to be on standby just in case the  
10 pace goes pretty quick.

11 CHAIR KEISER: If you do leave here  
12 this afternoon, George and I discussed it, we  
13 could have a policy discussion in the morning and  
14 then have our SACs in the afternoon so we could  
15 be sure that we have a quorum, unless there's an  
16 objection from the Members.

17 G.A. SMITH: Just to clarify, Art,  
18 it's still possible for us to have a quorum even  
19 though Ronnie can't join us until the afternoon.  
20 But in case --

21 CHAIR KEISER: Just in case it will  
22 give us comfort.

1 G.A. SMITH: I got you, I just wanted  
2 to make sure people understood we could still do  
3 SACs in the morning if you went with the next  
4 Agency.

5 J. DERBY: I like that plan.

6 (Simultaneous Speaking.)

7 CHAIR KEISER: How about ADA, are they  
8 around or no?

9 G.A. SMITH: They're saying they're  
10 here. They're here, it might take a moment. If  
11 you guys are interested maybe we could take a  
12 quick break.

13 CHAIR KEISER: We'll take a five-  
14 minute break, we'll be back here at 3:06 p.m.

15 (Whereupon, the above-entitled matter  
16 went off the record at 3:01 p.m. and  
17 resumed at 3:07 p.m.)

18 CHAIR KEISER: Thank you for waiting  
19 for us. We are going to have a fourth agency  
20 that we're going to review today and the current  
21 Agency up for renewal of recognition is the  
22 American Demo Associations, condition on Demo

1 accreditation, ADA CODA.

2 The primary readers are Jennifer Blum  
3 and Robert Shireman, the departmental staff is  
4 Mike Stein. Jennifer, Bob, you're up.

5 J. BLUM: Bob, I'll do the intro. The  
6 Commission on Dental Accreditation CODA is a non-  
7 Title IV programmatic accreditor.

8 The Agency's accrediting activities  
9 include the accreditation of pre-doctoral,  
10 dental education programs leading to the DDS or  
11 DMD degree, advanced general dentistry education  
12 programs, advanced dental specialty education  
13 programs, and the allied dental education  
14 programs, including dental assisting education  
15 programs, dental hygiene education programs,  
16 dental laboratory technology education programs  
17 and dental therapy education programs, and those  
18 developing programs that have attained initial  
19 accreditation status and those programs offered  
20 via distance education.

21 The Agency accredits more than 1400  
22 programs, currently covering 22 dental education

1 areas.

2 Recognition by the Secretary allows  
3 the programs accredited by CODA to participate in  
4 federal programs other than Title IV,  
5 specifically the Public Health Service Act  
6 administered by HHS.

7 The Agency is not required to meet  
8 separate and independent requirements because of  
9 its federal link. Its federal link is not Title  
10 IV federal assistance.

11 The predecessor to CODA was first  
12 recognized in 1952 and the last full review of  
13 the Agency was conducted at the June 2012 NACIQI  
14 meeting. The Agency completed a compliance  
15 report in 2013 and a focused review in 2017, at  
16 which time it was renewed for five years.

17 CHAIR KEISER: Mike?

18 M. STEIN: Thank you, Mr. Chair and  
19 Committee Members, my name is Mike Stein and I'm  
20 providing a summary of the petition for renewal  
21 of recognition for the American Dental  
22 Association Commission on Dental Accreditation,



1       also known as CODA or the Agency.

2               The accreditation to the senior  
3       department official is that the agency has  
4       substantial compliance in its recognition should  
5       be the need for five years.

6               Department Staff identified one  
7       outstanding issue regarding the agency laws  
8       related to the recognition area of basic  
9       eligibility, organizational, and administrative  
10      requirements.

11              Department Staff recommends the Agency  
12      submit a monitoring report 12 months from the  
13      date of the senior department official's letter.

14              The monitoring report should include  
15      rosters for each site visit conducted during the  
16      12-month period that clearly identifies each  
17      person and their role on each site visit team.

18              This recommendation is based on a  
19      review of the Agency's petition and supporting  
20      documentation as well as three virtual  
21      observations that included an AGC Commission  
22      meeting conducted in January of 2021, a file

1 review conducted during August 2021, and a review  
2 Committee meeting conducted January 2022.

3 The Department received one complaint  
4 against the Agency during the review period which  
5 was closed with no further action.

6 Therefore, as we said earlier, the  
7 Department Staff is recommending to the senior  
8 department official to renew the Agency's  
9 recognition of the nationally recognized  
10 accrediting agency at this time subject to  
11 refreshment and review of the monitoring report  
12 due in 12 months.

13 The representatives here from the  
14 organization will be happy to take any questions  
15 you may have.

16 CHAIR KEISER: Are there any questions  
17 by the Committee to any of the Staff?

18 J. BLUM: Yes, I have some. I just  
19 want to make sure that I understand -- I don't  
20 want to lose you on this but this issue that's  
21 causing the monitoring report, is it the  
22 Department is reading the regulation, the

1 criteria to require that the Agency, or any  
2 Agency for that matter, have each an educator and  
3 a practitioner as part of the site visiting teams  
4 as opposed to one person can't satisfy both  
5 roles?

6 M. STEIN: That's correct.

7 It's my understanding in the past that  
8 our understanding of that regulation is a  
9 problematic accrediting agency you have to have  
10 at least one educator and one practitioner on  
11 every site visit team as well as decision-making  
12 bodies and other review bodies.

13 J. BLUM: And there can't be a person  
14 who can satisfy both being an educator and a  
15 practitioner, which by the way happens? There  
16 are such people.

17 M. STEIN: Right, particularly in  
18 CODA's case, it's easy for someone to meet the  
19 definition of both roles, which is fine. There  
20 should be one person filling one role at a time.

21 They could be an  
22 educator/practitioner, which is how they're often

1       labeled but you would want each role separately  
2       identified on the site team.

3               I don't know if the Chairman will jump  
4       in if he has anything else to add from a  
5       historical perspective but that's my  
6       understanding of how we've enforced that in the  
7       past.

8               (Simultaneous Speaking.)

9               J. BLUM: Before Herman jumps in,  
10       because I am interested in Herman's point, the  
11       actual criteria reads educator, practitioners  
12       and/or employers on its evaluation.

13               So, that and/or, to me, if I were  
14       reading it as an Agency I might think it could be  
15       a single -- that you don't have have to have all  
16       three because you have an and/or.

17               I'm going to ask CODA similar  
18       questions but to me this is an example of a  
19       monitoring report that's one year out, which I  
20       also have a question about.

21               Can we just say they can accomplish  
22       the monitoring report in the next three weeks? I

1 looked at that and I believe you don't have to  
2 wait a year on monitoring reports.

3 And this one to me seems truly  
4 administrative if all that we're asking them for  
5 is to designate on their rosters that they have  
6 one of each. Although, in my personal view  
7 that's not necessarily required by the criteria.

8 So, I am interested in thoughts on  
9 this from the Staff perspective.

10 M. STEIN: Sure, and Herman can chime  
11 in with any historical perspective, I would say  
12 that the finding isn't one of significance. It  
13 seemed to me our definition is substantial  
14 compliance.

15 It was clear from a review of their  
16 documentation that in general, their policies  
17 speak to including education or education  
18 representative and practitioners on their site  
19 visit teams.

20 The details of the policy that talked  
21 about the composition of each site visit team was  
22 a little confusing and it wasn't clear that it

1 required educators and practitioners on every  
2 site visit team for each specialty discipline.

3 In fact, one of them, if not two, if  
4 I remember correctly, talked about including  
5 administrators, which isn't something that's  
6 required for programmatic accrediting agencies.

7 And it was clear from looking at the  
8 general roster of site visitors, they included  
9 minimum educators and practitioners.

10 I do understand from talking with the  
11 Director that within their specialty it's very  
12 easy for someone to be an educator and a  
13 practitioner.

14 And the documentation for each  
15 specific site visit team, some clearly indicated  
16 educators and practitioners, some it was just a  
17 little unclear. So, that was the reason for the  
18 recommendation.

19 I'll let Herman speak to any kind of  
20 historical knowledge about how we've interpreted  
21 or enforced that rule.

22 H. BOUNDS: In the past, that has been

1 our interpretation of having individuals serve a  
2 specific role on the site team. It would seem a  
3 little odd if you had a supply team and you had  
4 one person, say, serving in three different  
5 roles.

6 I think somebody could challenge that  
7 in some sort of complaint review or something in  
8 that matter. But we've always looked at that as  
9 having an educator, a practitioner now the new  
10 regulation says educator practitioner and/or  
11 employer.

12 That's some of the history on the  
13 background and whether NACIQI believes otherwise  
14 is something for NACIQI to evaluate.

15 CHAIR KEISER: Do we have questions  
16 from Staff?

17 J. BLUM: I had one other which is I  
18 noted and I'll ask the Agency about this as well,  
19 it seemed like in terms of negative actions,  
20 adverse actions that the Agency can take, looked  
21 like they only have two, denial, which presumably  
22 is from initial accreditation and withdrawal.

1                   And those are the only two adverse  
2                   actions. Mike, am I reading that correctly? I  
3                   just want to make sure. Is that your read too?

4                   M. STEIN: That's correct.

5                   J. BLUM: That seems somewhat unique,  
6                   I haven't seen that before and I'll ask about  
7                   that further but thank you.

8                   CHAIR KEISER: Now we have the Agency  
9                   to present and I'd recognize Dr. Sherin Took's,  
10                  the Director of CODA, and have you introduce your  
11                  fellow panel members.

12                  S. TOOKS: Thank you, Mr. Chairman.

13                  My name is Sherin Took's and I am the  
14                  Director of the Commission on Dental  
15                  Accreditation. I have with me Dr. Sanjay Malliya,  
16                  who is our current Vice Chair, and Ms. Kathryn  
17                  Albrecht, who is CODA's legal Counsel.

18                  I will turn it over to Dr. Malia to  
19                  make opening remarks and I believe that he will  
20                  present some information, Ms. Blum, to your  
21                  question regarding the site visit team  
22                  composition and then certainly, we're happy to



1 address any questions that NACIQI has.

2 Thank you so much.

3 S. Mallya: Good afternoon, my name is  
4 Dr. Sanjay Mallya and I'm the Vice Chair of the  
5 Commission of Dental Accreditation, also known as  
6 CODA. Dr. Tookes and Ms. Albrecht are here with  
7 me.

8 CODA's Chair, Dr. Bruce Rotter, was  
9 unable to join us today but sends his regards.  
10 We'd like to thank the USDA Staff, in particular  
11 Mike Stein and Dr. Bowens for their current  
12 review of the petition for readmission and  
13 guidance throughout the process.

14 We also thank the members of NACIQI  
15 for the review of our petition. CODA takes pride  
16 in ensuring fulfilment of its mission just to  
17 serve the public and the dental profession by  
18 developing and implementing accreditation  
19 standards.

20 But more importantly, continuous  
21 scholarship and improvement of dental education  
22 programs.

1                   Since its initial recognition in 1952,  
2 CODA has consistently applied a rigorous dental  
3 education program to all dental and dental  
4 -related education programs that seek  
5 accreditation for that standard developed through  
6 the broad communities of interest and nationally  
7 accepted.

8                   CODA's program review and due process  
9 mechanics allows for a fairer and consistent and  
10 objective review of dental education programs  
11 seeking accreditation, all the accreditation by  
12 the Commission to clear policies and procedures  
13 as well as robust interest protocols.

14                  Further the Commission applies a  
15 continuous monitoring process for education  
16 programs through various policies and procedures  
17 including its annual selling, program changes,  
18 and government increases and others.

19                  Further, students and the public have  
20 entertained CODA process through very mechanisms  
21 including student engagement through interviews  
22 with educational site visits, representation of a

1 public member on each of its 17 review Committees  
2 which are advisory to CODA, representation of a  
3 student and full public members on the Board of  
4 Commissioners, and the ability to fight  
5 complaints against programs under CODA's purview.

6 The engagement in the readmission  
7 process under the new regulations, the government  
8 took swift action to devise its policies and  
9 procedures to align with the changes made to the  
10 criteria for recognition.

11 In doing so, we believe the process of  
12 re-recognition has served its process of allowing  
13 the Commission to review and strengthen its  
14 accreditation program.

15 As we conclude our opening remarks, we  
16 would like provide further comment on the USDA  
17 analysis related to CODA's compliance in 602 15A4  
18 which states educators, practitioners, and are  
19 employers on its evaluation, policy, and  
20 decision-making values if the agency-accredited  
21 programs are single purpose institutions and  
22 their students are in specific professions.

1           The Commission believes that it has  
2 met this critical intent of 602.A4 and asks  
3 NACIQI to consider the following perspective in  
4 making a recommendation to the USDA.

5           First the most recent USDA recognition  
6 criteria indicates educators, practitioner and  
7 our employers, which I guess for the and/or and  
8 comma placement provide a list of potential  
9 individuals who may be enrolled in the process.

10          We note that the prior recognition  
11 criteria stated educators and practitioners. The  
12 new regulation appears to allow greater  
13 flexibility than the prior regulation. CODA also  
14 notes that we have educators and practitioners on  
15 our site visit team with the teams and the  
16 Commission.

17          Second, CODA believes that among  
18 program to program accreditation agencies and  
19 especially those with healthcare themes,  
20 professionals maybe hope educators and  
21 practitioners concurrently.

22          Students all complained in clinical

1 settings under the clinical license of an  
2 educator who is also a practitioner.

3 In fact, user individuals who can fill  
4 both roles concurrently schedule the  
5 accreditation review process because these  
6 individuals can apply the education principles  
7 needed for student learning along with the  
8 practice experience needed upon graduation.

9 The ability of the distance of  
10 knowledge and skill are critical in  
11 accreditation.

12 Third, we are unsure why an individual is  
13 prohibited from serving concurrently in two  
14 roles, namely, educator and practitioner since  
15 the criteria did not stipulate this provision as  
16 part of the requirement.

17 But the intent is that the site was  
18 the only real material based on the road side, we  
19 feel the value of having an individual who can  
20 serve marked roles is lost.

21 Site visitors draw upon all of their  
22 knowledge and experience as educators and

1 practitioners in conducted review and this study  
2 goes to the individual to see a varied  
3 perspective.

4 Following CODA's review of the initial  
5 staff analysis, CODA marked by its policies and  
6 procedures to more clearly identify the roles of  
7 educator and practitioner.

8 Further, following the review of the  
9 final report, that review of the team data will  
10 rely on the education program of the prior year  
11 using the criteria that an individual can only  
12 serve in one role.

13 CODA found that approximately 94 of  
14 the 95 advanced site visits and 85 of the 88  
15 advanced site visits in the last year included  
16 themes with one educator and one practitioner if  
17 CODA were to have assigned this role to  
18 individuals in a single program.

19 As noted, CODA revised its policies to  
20 require site visitors to inform CODA of the  
21 educator of practitioner status and will make  
22 site with team assignments available. However,

1 through a retrospective review, we believe that  
2 we have complied with this criteria.

3 The Commission will move forward with  
4 assigning site visitors to a single role and  
5 request that NACIQI consider this matter and the  
6 interpretation of 631 15A4.

7 Based on our recent data analysis, we  
8 respectfully request that CODA be found compliant  
9 with no further reporting required. Ms.  
10 Albrecht and I are happy to answer any questions  
11 that you may have.

12 Thank you for the opportunity to make  
13 this introductory statement.

14 CHAIR KEISER: Thank you. Our primary  
15 readers, Bob and Jennifer?

16 B. SHIREMAN: Jennifer, you go ahead  
17 and start.

18 J. BLUM: Thanks for the presentation  
19 and I'm inclined to agree with you. For the  
20 discussion purposes for particularly later when  
21 we're contemplating motions, I think it's good to  
22 have a conversation with you now about it.

1 I tend to agree with you because I  
2 don't think somebody who serves as both, there  
3 was somebody who was an educator and a  
4 practitioner, when they're going to do a site  
5 review all of the sudden can only put one hat on.

6 They're probably going to be looking  
7 at whatever it is they're reviewing with both  
8 hats, and actually, I think that's a good thing.

9 I think it would only become  
10 problematic if for some reason there was only one  
11 site visitor and that one site visitor was  
12 covering all three bases and that would get a  
13 little messy and squirrely. But that's not the  
14 situation here.

15 What I'm seeing and what I think I'm  
16 seeing is simply a really, really administrative-  
17 type error where people weren't labeled. It  
18 wasn't that the site visitors didn't comply with  
19 the requirements of the criteria.

20 And so I guess I assume that based on  
21 your presentation, that's pretty much exactly  
22 what your feelings are on this.



1                   S. Mallya: That's correct, and  
2 perhaps I would let Dr. Tooks state the question  
3 on these.

4                   S. TOOKS: If I may, we do believe  
5 that in the instances that we went back to  
6 retrospectively, as Dr. Mallya indicated, there  
7 were less than a handful that we didn't feel  
8 confident making the determination  
9 retrospectively.

10                  But moving forward, we certainly have  
11 put in place a form that our site visitors are  
12 actually going to be designating that they  
13 qualify in those two criteria, which either/or,  
14 or perhaps both, so that it aligns with the  
15 policy that we put in place to direct report the  
16 requirement.

17                  J. BLUM: I have a follow-up on this  
18 and then I have two different subject matter  
19 questions. On this, do you feel that you need a  
20 year to file a monitoring report that would  
21 satisfy the Department's request?

22                  S. TOOKS: No, not necessarily, it

1 would be a matter of whether -- if I may, I think  
2 there are a couple of issues here.

3 First of all, the comma placement and  
4 then the and/or lead us to the question as to  
5 whether you actually need all three or any of the  
6 combination of the three or perhaps you could  
7 have two educators or two practitioners on a  
8 team.

9 So, we believe that the language and  
10 comma placement and the use of and/or allow the  
11 accrediting agency the flexibility to dictate its  
12 team composition as it deems appropriate with any  
13 combination of those individuals, not necessarily  
14 two different distinct individuals.

15 That's Issue 1.

16 If we are to be held to the  
17 interpretation that has occurred we are in the  
18 process now, as we have implemented a new policy  
19 on this, we are in the process of collecting that  
20 information from our site visitors and moving  
21 forward will dictate you are the educator, you  
22 are the practitioner for the purpose of complying

1 with this requirement.

2           However, we still contend that the  
3 most robust process of an accreditation review  
4 comes from individuals who can actually serve in  
5 any role which they have background and  
6 experience and expertise to do.

7           J. BLUM: I'm going to move on to  
8 different topics.

9           As I mentioned with the Department  
10 Staff, I was kind of curious, I noted that it  
11 seems like you only have two adverse actions and  
12 in a way, only one because I assume you only use  
13 denial on the initial review.

14           I guess you could use it on a renewal.  
15 And then withdrawal.

16           So, you have no show-cause, you have  
17 no probation, do you provide, because the way I  
18 look at accreditation, not that it's great to  
19 have multi layers of negative action so I'm not  
20 suggesting that either but do you provide  
21 commentary on improvement?

22           I will say it made me a little bit

1 concerned because oh, my gosh, if you jump from  
2 approval to withdrawal and there's no gray space  
3 in between, it seems like you would be wanting to  
4 approve everybody.

5 And so that's just my interpretation,  
6 you can read the slip too. So, I really want to  
7 give an opportunity to you on what there is in  
8 between approval and withdrawal if there is  
9 anything in between.

10 S. TOOKS: Absolutely, that's a great  
11 question. I'll start by saying this is my 20th  
12 year with CODA and I have been serving as the  
13 Director of CODA for the last nine years.

14 I've been before this group, this is  
15 my third time with you and I say all of that to  
16 state that in my 20 years with CODA, these have  
17 been our accreditation standards.

18 I don't know the history or the  
19 statuses I should say, the accreditation statuses  
20 of programs. I don't know the initial history as  
21 to how these statuses came to be but I believe  
22 that they are in place to essentially simplify

1 the process.

2 And you're correct that denial of  
3 accreditation is an adverse action that is  
4 appealable related to an applicant program.

5 Withdrawal of accreditation is an  
6 adverse action that's appealable related to re-  
7 recognition or re-accreditation of a program,  
8 however, we also have an approval with reporting  
9 requirement status and we have an intent to  
10 withdraw that could be added to the approval with  
11 reporting requirement status.

12 And those statuses are used in between  
13 the full, if you will call it full,  
14 reaccreditation approval without reporting  
15 requirements leading to a potential withdrawal of  
16 accreditation.

17 So, those statuses certainly alert the  
18 program that there are deficiencies. All of our  
19 transmittal letters to programs provide them with  
20 details as to the deficiencies as well as the  
21 requested information.

22 So, they have very clear instruction

1 as to the deficiency citation and the information  
2 the CODA needs to see for them to become  
3 compliant. And the programs have generally  
4 speaking an 18 to 24-month timeframe to come in  
5 to compliance.

6 CODA will use the intent to withdraw add-on,  
7 if you will, to the approval with reporting  
8 requirement status typically in the last six  
9 months.

10 And CODA may extend for good cause if  
11 there is a good cause reason deemed appropriate  
12 by the Commission, but that's kind of the  
13 chronology if you will of our accreditation  
14 statuses.

15 J. BLUM: That's extremely helpful and  
16 actually makes me feel a lot better. My last  
17 question is on student achievement standards and  
18 I think Bob may have questions about this but I  
19 just have one.

20 On licensure pass rates, I saw a  
21 figure, I think it was Figure 9 of Exhibit 170,  
22 but anyway it was really a high impressive

1 licensure rate, which is great, but I just wanted  
2 to ask about that.

3 It's noted that it's the percentage of  
4 graduates who take the -- it's a pass rate for  
5 those who take the exam. Just out of curiosity,  
6 are there graduates who don't take the licensure  
7 exam that you know of?

8 Is there a certain percentage of folks  
9 who go through programs that are licensure  
10 programs and for whatever personal reasons don't  
11 take the exam?

12 S. TOOKS: With the Commission being  
13 large in the number of program disciplines that  
14 we accredit, I'm going to give you a different  
15 answer depending on the discipline.

16 In dental education, leading to the  
17 DDS or DMD, which is a practicing general  
18 dentist, those individuals generally have to  
19 attend a code-accredited program as well as sit  
20 for a national written and clinical exam to be  
21 licensed.

22 In those cases, generally anyone who

1 is a graduate of a program is going to have to  
2 take those licensing exams to be licensed to  
3 practice. The same applies for dental hygiene,  
4 those are licensed state regulated state  
5 licensure licensed professionals.

6 In advanced dental education, those  
7 individuals are already licensed dentists but  
8 they may be getting board-certified in a  
9 specific, quote, specialty of dentistry, which  
10 would be beyond the DDS or DMD degree.

11 And I used, quote, specialty, because  
12 CODA doesn't define the specialties of dentistry  
13 and we make a really big point of clarifying that  
14 to everyone but we accredit these advanced  
15 education disciplines.

16 In allied dental education, I  
17 mentioned dental hygiene as being a licensed  
18 profession. Two of the other allied disciplines  
19 that we accredit, dental assisting and dental  
20 laboratory technology, it depends on the state.

21 But generally speaking, if I were to  
22 generalization, I would say they're not generally



1 licensed so in other words you may not even have  
2 to attend a CODA-accredited program to practice  
3 in those two disciplines.

4 In those cases, the completion rate  
5 and the sitting for a certification exam may not  
6 correlation with one another as nicely because  
7 you don't have to have that certification of  
8 practice.

9 J. BLUM: That was helpful, and then  
10 one last question about the licensure rate that I  
11 saw and now I don't have it in front of me so I  
12 don't know which one it was but I was just  
13 curious, I know some age when we look at  
14 licensure rates, sometimes it's licensure pass  
15 rates of the first time they took the exam versus  
16 the second.

17 Do you know off the top of your head  
18 if the licensure pass rates that you're  
19 referencing are just based on a one attempt pass  
20 rate?

21 S. TOOKS: I don't know that off the  
22 top of my head but I do know that when we are

1       accrediting programs when we're doing the actual  
2       on-site visitation, those discussions are had by  
3       the site visit team and the programs as part of  
4       their outcomes assessment process.

5               J. BLUM: I was wondering because the  
6       rates that I saw were so high and not that it's  
7       possible that they are on the first attempt but I  
8       was wondering whether some of them are on --  
9       which is also fine, to have a second or third  
10      attempt.

11             But I was just curious. I think those  
12      will satisfy my questions. Bob?

13             B. SHIREMAN: Thank you for your  
14      presentation.

15             I'm glad that Jennifer brought up the  
16      issue of approval versus denial and I'm totally  
17      fine with the way that you are doing it and even  
18      to caution you about going in a direction of  
19      having a bunch of in between stops.

20             And the example I'll provide is that  
21      the IRS review of tax exempt entities used to be  
22      just approval or deny and a bunch of observers

1       said the IRS is too reluctant to do anything when  
2       there are problems.

3               We need to give them some intermediate  
4       sanctions but now some commentators are seeing  
5       that the intermediate sanctions have created a  
6       situation where people are more willing to  
7       violate the rules because they figure there will  
8       just be a penalty, I'll pay the penalty and deal  
9       with it afterwards.

10              So, as long as you actually are  
11       monitoring and notifying folks, there is a  
12       benefit to them knowing there are severe  
13       consequences if they do not come into compliance.  
14       So, I support what you're doing there.

15              You'll probably notice that I ask a  
16       lot about public members, the regulatory  
17       requirements for public members are pretty  
18       minimal. I'm just saying they cannot be  
19       associated with any of your accreditation  
20       colleges.

21              You go further, you say there cannot  
22       even be a dentist or a member of the allied

1 dental field. So, I think that's great, you've  
2 got the dean of a law school, professor of  
3 optometry and a nurse who actually as a Ph.D. in  
4 higher education leadership.

5 Can you tell me how this approach to  
6 public members evolved and what role you asked  
7 your public members to play?

8 S. TOOKS: Absolutely, I believe that  
9 the Commission values greatly the participation  
10 of public members.

11 As we've indicated in our petition, we  
12 have public members on each of our 17 review  
13 Committees which are advisory to the Commission  
14 and then we have four public members out of the  
15 33 Board of Commission Members.

16 The evolution of public member  
17 criteria has really been -- this has been a long-  
18 standing criteria of the Commission, that they  
19 not have any ties to dentistry and I believe that  
20 this is in place really to ensure that we have  
21 that public perspective, more so than input from  
22 individuals who already are aware of dentistry or

1 the dental education practicing professional  
2 characteristics.

3 We get a lot of that already from our other  
4 members who bring their expertise and so we're  
5 pretty firm about the expectation for our public  
6 members.

7 It is very difficult, I will say, to  
8 find public members but we somehow manage to do  
9 so and I think they bring a great perspective and  
10 they're valued very greatly.

11 B. SHIREMAN: Your annual surveys that  
12 you provided, thank you for providing that and  
13 that is quite a data book. I notice that Table  
14 21 has student loan volumes by institution,  
15 meaning the total amount of student loans that  
16 they have.

17 But I didn't see anything in terms of  
18 average student loan debt in different  
19 disciplines. Is that something that you track?

20 S. TOOKS: I suspected you would ask  
21 this question.

22 Having sat in on all of the other

1 sessions the last day and a half, it's actually  
2 not something that CODA tracks directly, however,  
3 I did look and find a sister agency, if you will,  
4 which is the American Dental education  
5 Association does collect information from  
6 graduating students and their latest data, and I  
7 apologize that I'm looking at the side, I'm  
8 looking at another screen, that I was able to  
9 find reflects that the average dental school debt  
10 in 2021 reported by senior dental students is  
11 about the same as it was in 2016.

12 So, that's the data that's available  
13 right now, CODA doesn't specifically collect that  
14 information.

15 B. SHIREMAN: I do suspect that some  
16 of the more importantly student loan debt and  
17 earnings data to track would be for some of the  
18 allied dental fields where the earnings I'm  
19 guessing are probably more variable.

20 So, I would encourage you to make use  
21 of that data which is more available than it's  
22 ever been before.

1           A couple of other items you have in  
2           the annual survey, you have a rank order of  
3           schools by the percentage of financial aid  
4           revenue and then there's also percentage of  
5           financial aid expenses.

6           I have two questions, when you say  
7           financial aid revenue, does that include loans or  
8           are we talking about grants? And then I wasn't  
9           sure what you meant by financial aid revenue of  
10          an institution.

11          They're very low numbers so I'm  
12          assuming it's not Title IVA because I would think  
13          that would be a high number.

14          S. TOOKS: I'm not 100 percent clear  
15          on what you're looking at but I would say a lot  
16          of the data that we collect is twofold.

17          B. SHIREMAN: Table 12 is the one that  
18          I'm asking is financial aid revenue if you happen  
19          to have it.

20          S. TOOKS: I do not, I apologize, but  
21          I would say this, the data that we collect  
22          related to our annual survey serves a couple of

1        purposes.                    One is that of course it's  
2        very important to the accreditation process and  
3        we actually use the annual survey data, we  
4        compile it for a program for the last five years  
5        and provide it to a site visit team.

6                    They have essentially a five-year  
7        compilation of the program's changes and things  
8        like that, so it's very valuable in that regard.

9                    Additionally, the dental education  
10       programs themselves like to benchmark against one  
11       another and so we publish a lot of what we  
12       consider publicly available information so the  
13       programs can utilize that to compare themselves  
14       with other educational programs.

15                   B. SHIREMAN: One other figure, Figure  
16       11, just to be aware of, it talks about dental  
17       assisting programs and it has the number of  
18       students requesting financial aid.

19                   My guess is that's grants and loans,  
20       it is very useful to differentiate at least from  
21       a student perspective.

22                   The school gets the money either way



1 but from a student perspective it has a very  
2 different feel and I think important to the  
3 monitoring those sorts of things.

4 On recruiting practices, a lot of  
5 agencies take a minimalist approach to the  
6 requirement that they have a policy on  
7 recruiting.

8 Your policy statement on advertising and  
9 recruiting is a quite strong statement that  
10 institutions should not only avoid outright lies  
11 but they must it says, quote, exhibit integrity  
12 and responsibility in advertising and recruitment  
13 and that responsible self-regulation requires  
14 rigorous attention to principles of et cetera  
15 practice, which seems like a good just general  
16 don't do sleazy things, don't try to come as  
17 close as possible to the line.

18 Be very et cetera. What kind of  
19 monitoring do you use to enforce this policy?

20 S. TOOKS: This policy along with I  
21 would say coupled with the standards that we have  
22 on admissions and student recruitment, the

1 standards along with admission talk about having  
2 written admissions policies and procedures.

3 And so those things are reviewed very  
4 closely during an accreditation site visit.  
5 something. That's when I would say the most  
6 rigorous review occurs.

7 Having said that, it is not too  
8 frequent but it does happen in which we learn of  
9 perhaps some advertising that's going on in which  
10 we will write to a program and say, look, you  
11 need to clean up your website, you're not stating  
12 this in accordance with what we allow for your  
13 accreditation status or it's incomplete or you're  
14 not clarifying your accreditation sponsoring  
15 organization.

16 We have written those letters and will  
17 take action when things are brought to our  
18 attention and do so as needed.

19 B. SHIREMAN: That leads well into my  
20 last question, which is you say in your narrative  
21 that you recently changed your policies so that  
22 you could respond to anonymous complaints and I

1        imagine that a complaint about an ad might  
2        sometimes be anonymous.

3                    Can you explain what led to your  
4        change in policy?

5                    S. TOOKS: We were advised many years  
6        ago to consider both formal written complaints,  
7        which we consider signed by an individual whom we  
8        can correspond and have a name to as well as  
9        anonymous complaints.

10                   So, the Commission will accept  
11        anonymous complaints and by that what we mean are  
12        individuals who we can't communicate with.  
13        They've either created perhaps a fake email  
14        account or sent something in the mail to us.

15                   We take all of those seriously and so  
16        in doing so an anonymous complaint, just because  
17        it's anonymous, shouldn't be this regarded.

18                   If it has merit and potential need for  
19        review, then the Commission will take action to  
20        proceed with that review and inform a program of  
21        the receipt of that information and desire to  
22        inquire as to their compliance with a potential

1 outstanding area.

2 B. SHIREMAN: Thank you so much.

3 CHAIR KEISER: Further questions while  
4 I have everybody on? Jill?

5 M.E. PETRISKO: Thank you very much  
6 for your presentation.

7 CHAIR KEISER: You need to get closer  
8 to your microphone.

9 J. DERBY: I'm doing my best, thank  
10 you for reminding me. Thank you for your  
11 presentation and your very clear answers to the  
12 questions that have been asked so far.

13 I want to actually encourage Members  
14 of the Department to take seriously what you have  
15 been saying about the educator and practitioner  
16 being together in one person.

17 I think that is tremendous strength to  
18 have both of those together and to allow that to  
19 happen, unless of course, as Jennifer said,  
20 there's only one person on a team, which I assume  
21 never happens for you.

22 I just wanted to say I think it's a

1 great idea for you to interpret it that way.

2 I apologize for this next question  
3 because it did not come up to me until the  
4 primary readers were talking so I did not look at  
5 your website about this but with regards to the  
6 statuses you have of approval or withdrawal, my  
7 understanding ordinarily has been that withdrawal  
8 is voluntary on the part of the institution.

9 Is withdrawal, as CODA uses that term,  
10 both voluntary and involuntary and however any  
11 member of the public know what the difference  
12 would be?

13 S. TOOKS: I believe I lost Dr.  
14 Petrisko. Is that me or is that everyone?

15 CHAIR KEISER: I think her question  
16 was how do you define withdrawal of recognition?

17 S. TOOKS: Sure.

18 I believe the intent here is to  
19 distinguish between an action that would be an  
20 adverse action, which is what we refer to as  
21 withdrawal versus the program voluntarily  
22 discontinuing its own accreditation with CODA,

1       which is the program choosing to close or no  
2       longer be accredited by CODA.

3               And the language or term we use for  
4       that, term of art if you will, is discontinue  
5       accreditation. We actually have two separate  
6       terms.

7               Discontinuing is the term that is the  
8       program's choice to discontinue, the withdrawal  
9       is CODA's adverse action against a program.

10              M.E. PETRISKO: Thank you, as long as  
11       it's defined that way and it's clear, thank you  
12       very much.

13              With regards to the approval with reporting,  
14       is there any gradation there because a report can  
15       be you haven't updated your student handbook or  
16       it could be we found that your faculty aren't  
17       qualified.

18              And those are very different things.  
19       So, again, as far as informing the public about  
20       how well an institution is doing, how is that  
21       communicated if there really are gradations in  
22       what's needed?

1           S. TOOKS: We don't rank, if you will,  
2           the severity of educational standards and their  
3           compliance thereof. So, in our view as CODA, the  
4           approval with reporting requirements status is  
5           used for any outstanding area in which the  
6           program is out of compliance.

7           The severity of it becomes impactful  
8           when the intent withdraw is added to it, which is  
9           typically within that last six months before the  
10          withdrawal adverse action may take effect.

11          But again, trying to be succinct and  
12          clear and as simple as possible, there's no  
13          variability, it's approval with reporting  
14          requirements if a program is out of compliance  
15          with any standards.

16          M.E. PETRISKO: Thank you, that's very  
17          helpful.

18          CHAIR KEISER: Jill?

19          J. DERBY: Yes, a quick question, on  
20          your Commission, particularly your site visits, I  
21          know that you accredit dental hygiene programs.  
22          Do you include dental hygienists in those groups?

1                   S. TOOKS: Absolutely, and thank you  
2                   for the question, Dr. Derby. Yes, CODA is a peer  
3                   review process and so the site visit teams are  
4                   peers in that particular discipline.

5                   So, using the discipline that you just  
6                   identified, the site visit team to a dental  
7                   hygiene program would be dental hygienists. The  
8                   site visit team to a pediatric dentistry program  
9                   would be pediatric dentists, et cetera.

10                  J. DERBY: That's helpful, thank you.

11                  CHAIR KEISER: Jennifer?

12                  J. BLUM: Apologies for another  
13                  question but Mary-Ellen prompted me to think of  
14                  something else related to her line. So, if you  
15                  only have the actions that you have and you don't  
16                  have probation, there are a number of federal  
17                  regulations.

18                  And again, I'm not necessarily  
19                  suggesting you should have probation but because  
20                  you don't, there are a number of regulations that  
21                  may even be at the state level too, I'm just not  
22                  thinking off the top of my head, but at the



1 federal level certainly.

2 There are a number of regulations  
3 where if a program or an institution is put on  
4 probation it triggers other things by the  
5 Department and by other regulators and perhaps  
6 even by the accreditor.

7 And the one that comes very top of  
8 mind is Teach Out Plans. If you have a program  
9 on probation, the program needs to submit a Teach  
10 Out Plan to your agency. Do you treat intent to  
11 withdraw as the equivalent thereof to probation?

12 What status do you decide the Teach  
13 Out Plan is necessary? And I'm just using that  
14 as an example of those types of triggers.

15 S. TOOKS: We don't have a  
16 probationary status. We have the two adverse  
17 actions being denied and withdrawn.

18 Regarding Teach Out plans in  
19 particular, the Commission modified its policy  
20 and procedure within the last two or three years  
21 I would say to strengthen the Teach Out/program  
22 closure requirements, which are that if a program

1 is closing, it must provide a Teach Out plan to  
2 the Commission.

3 And the Commission will monitor that  
4 program and all of its enrolled students and will  
5 not discontinue accreditation until that Teach  
6 Out plan has been fulfilled and all those  
7 students have matriculated through the program.

8 That's a specific monitoring  
9 mechanical for Teach Out.

10 J. BLUM: That's required I think by  
11 any agency, that if a school is closing  
12 technically they should have provided the Agency  
13 a Teach Out Plan.

14 So, while I'm glad you're doing it  
15 now, that's something that actually you probably  
16 should have been doing for a while.

17 I'm more interested in the issue of  
18 Teach Out Plans. What we often know in this  
19 world of school closures is that everything  
20 happens too late, for the student I mean.

21 And so there is a regulatory  
22 requirement now that requires at the time of

1       probation that an institution or program provide  
2       a Teach Out Plan.

3               And if you don't have probation, I'm  
4       not suggesting -- I want to be really sensitive  
5       here because I'm actually not taking issue with  
6       the way you have your structure on actions.

7               But if it means that you're not going  
8       to be on top of a potential closure, forget the  
9       actual closure, but when you're seeing weakness  
10      that might be intent to withdraw, intent to  
11      withdraw sounds pretty harsh to me.

12              I would think that might trigger a  
13      Teach Out Plan requirement. That's I think a  
14      question for you, I actually now think I might  
15      want to go back to Mike Stein who already has his  
16      hands up to ask how they meet the requirement.

17              If they don't have probation, how are  
18      they meeting the requirement that requires them  
19      to have a Teach Out Plan if you hit probation?  
20      So, maybe this is a question for Department  
21      Staff.

22              M. STEIN: Sure, I just wanted to

1 point out that probation, which is applicable to  
2 a few different areas, mostly is in areas that  
3 apply to institutional accrediting agencies so  
4 around Title IV requirements, so substantive  
5 change and the Teach Out Plan agreement.

6 They would apply to institutional  
7 accrediting agencies rather than programmatic.  
8 So, in this case they were not applied to CODA.

9 J. BLUM: That's helpful.

10 CHAIR KEISER: Are there any other  
11 questions? Sensing none, I would ask Mike to  
12 come back and make any comments.

13 M. STEIN: I don't have any further  
14 comment.

15 CHAIR KEISER: I do not believe there  
16 are any third-party commenters so we'll move to a  
17 motion by the two readers, Bob and Jennifer.

18 J. BLUM: I am hesitating, I'm either  
19 going to take the Department's or suggest that  
20 they have already been in compliance based on a  
21 very reasonable interpretation of the regulation  
22 as it stands currently with regards to educator

1 and practitioner.

2 B. SHIREMAN: Do you want my thoughts?

3 J. BLUM: Yes.

4 B. SHIREMAN: Because it's a close  
5 call, doing it without the additional signals the  
6 SDO that a reasonable case can be made either  
7 way. So, I kind of lean in that direction but  
8 I'm open to whichever direction you choose.

9 J. BLUM: I would like to strike the  
10 monitoring report and make a recommendation to  
11 the SDO for recognition for five years.

12 CHAIR KEISER: Is there a second to  
13 the motion?

14 M.E. PETRISKO: I second.

15 CHAIR KEISER: Seconded by Mary-Ellen  
16 Petrisko. Now we have discussion.

17 B. SHIREMAN: One thing is I think we  
18 should create a Subcommittee on the Oxford comma.

19 M.E. PETRISKO: I agree.

20 M. HALL-MARTIN: Team Oxford Comma.

21 CHAIR KEISER: We can do that after  
22 this motion. Any comments or questions on the

1 motion? Sensing none, I'll call for a vote.

2 We'll start with Kathleen.

3 K.S. ALIOTO: Yes.

4 CHAIR KEISER: Roslyn?

5 R. ARTIS: Yes.

6 CHAIR KEISER: Jennifer?

7 J. BLUM: Yes.

8 CHAIR KEISER: Ronnie?

9 R. BOOTH: Yes.

10 CHAIR KEISER: Wally?

11 W. BOSTON: Yes.

12 CHAIR KEISER: Jill?

13 J. DERBY: Yes.

14 CHAIR KEISER: David?

15 D. EUBANKS: Yes.

16 CHAIR KEISER: Michael?

17 M. LINDSAY: Yes.

18 CHAIR KEISER: Molly?

19 M. HALL-MARTIN: Yes.

20 CHAIR KEISER: Robert?

21 R. MAYES: Yes.

22 CHAIR KEISER: Mary-Ellen?

1 M.E. PETRISKO: Yes.

2 CHAIR KEISER: Claude?

3 VICE CHAIR PRESSNELL: Yes.

4 CHAIR KEISER: Bob?

5 B. SHIREMAN: Yes, and I encourage the  
6 Agency to monitor student loan debt and earnings  
7 for the allied and dentistry fields.

8 CHAIR KEISER: Zakiya?

9 Z. SMITH ELLIS: Yes, with the same  
10 support for the comment Bob just made.

11 CHAIR KEISER: Steven? I think he  
12 left us. The motion passes. Thank you and thank  
13 you, Members, we appreciate your time and efforts  
14 on behalf of your students. We have finished our  
15 day.

16 It's been a long day. tomorrow will  
17 be I hope our last day, meaning I don't think  
18 we're going to need to be meeting on Friday.

19 We are scheduled to start at 10:00  
20 a.m. tomorrow and I suggest that we do that and I  
21 also offer that we take the final morning agenda  
22 that's scheduled for that Friday morning, which

1 includes the policy discussion and we'll bring  
2 that into the morning and then at 1:00 p.m. begin  
3 the SACs recognition process.

4 G.A. SMITH: Do you mind if I  
5 interject just quickly?

6 We should have a disclaimer about  
7 dates and times listed for agenda items that are  
8 subject to change but there is a concern from the  
9 Agency that potentially the third-party  
10 commenters might not be available.

11 We're in the process of contacting the  
12 third-party commenters at this point just to see.  
13 But let's hope that the quorum can be achieved  
14 tomorrow morning and we won't even have to make  
15 the switch.

16 But I wanted to make you aware of  
17 that.

18 CHAIR KEISER: As long as you're  
19 watching everything. Bernie watches it all the  
20 time no matter what.

21 I think he's made a presentation at  
22 every meeting we've had that I can remember going



1 back to the Bush Administration and way before  
2 me. We'll do the best we can,  
3 hopefully we can do that tomorrow, otherwise, if  
4 you have a bigger problem with SACs because  
5 you've got a lot more presenters with the SACs.

6 G.A. SMITH: Right, and that's the  
7 concern, exactly.

8 M.E. PETRISKO: How do we know that?

9 CHAIR KEISER: We're meeting tomorrow  
10 at 10:00 a.m.

11 G.A. SMITH: We'll know whether or not  
12 the quorum is achieved and we're in the process  
13 of seeing whether or not the third-party  
14 commenters are available. So, more to come,  
15 maybe we can send you an email later today or  
16 surely we'll be discussing it.

17 B. SHIREMAN: You're checking to see  
18 whether the third-party commenters on SACs are  
19 available to do SACs imagine, is that what you're  
20 saying?

21 G.A. SMITH: It's the other way, it's  
22 those people who were supposed to be off need to

1 be available tomorrow morning. I see, it's the  
2 flexibility.

3 CHAIR KEISER: Then it will be harder  
4 to move SACs. If we convene at 10:00 a.m. and we  
5 can't move it, we may just take the morning off  
6 and start at 1:00 p.m.

7 G.A. SMITH: We'll be in touch either  
8 later today or first thing in the morning, we'll  
9 know the best route to take.

10 CHAIR KEISER: Wally, do you have a  
11 question?

12 J. DERBY: No, I just wondered if we  
13 could still get them both in tomorrow.

14 I know I only have couple of hours  
15 Friday morning if I needed to be on it and  
16 couldn't participate maybe in the whole  
17 discussion but is the issue about the  
18 availability of people? We couldn't just reverse  
19 the order and do policy first and the Agency  
20 second.

21 CHAIR KEISER: That's what we're  
22 trying to do, Jill, the policy in the morning,

1 and again, we don't need a quorum for policy,  
2 that's just a discussion.

3 J. DERBY: But if we can't, can we do  
4 policy in the afternoon?

5 CHAIR KEISER: We'll appraiser do SACs  
6 in the afternoon because we have a bigger group  
7 of presenters than we do for the policy  
8 discussion.

9 G.A. SMITH: You wouldn't need a  
10 quorum for policy too but there's no threat to it  
11 not being a quorum because no one is recusing for  
12 the policy conversation.

13 But just to let you know, there are  
14 also commenters for the policy part of the  
15 conversation to their third-party commenters that  
16 we want to reach out to.

17 CHAIR KEISER: Wally?

18 W. BOSTON: I just wanted to clarify,  
19 right now the plan is to do the policy in the  
20 morning unless you can move SACs up. I'm on both  
21 so I'll be here either way, I just wanted to get  
22 a bearing for which one would go first.

1 CHAIR KEISER: We're going to say  
2 tomorrow morning, 10:00 a.m. either way George  
3 gets organized. If not, we're going to need a  
4 half-day tomorrow and a half-day on Friday but I  
5 hope we can get everything done tomorrow.

6 K.S. ALIOTO: George, send an email to  
7 us if you found out.

8 G.A. SMITH: If we find out anything  
9 this evening, we'll be sure to reach out via  
10 email but the latest you'll hear from us is  
11 around 9:00 a.m. tomorrow morning.

12 K.S. ALIOTO: Thank you so much.

13 CHAIR KEISER: Everybody have a good  
14 evening and we will reconvene at 10:00 a.m.  
15 tomorrow morning.

16 (Whereupon, the above-entitled matter  
17 went off the record at 4:07 p.m.)  
18  
19  
20  
21  
22

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<p><b>a.m</b> 1:9 5:2 96:9,10 271:20 273:10 274:4 276:2,11,14</p> <p><b>ABA</b> 221:4</p> <p><b>abbreviated</b> 173:3</p> <p><b>ABHE</b> 2:8 4:6 10:13 12:7 14:13,20,22 15:1 15:3,4,9 16:21 17:1,6 18:2 19:18 20:7,15,19 21:1,3,4,12 22:16 23:5,12 24:6 26:3,16 27:18 28:2,13 29:12 30:12 31:1,5 32:16 33:21 34:18 35:19 36:4 37:16,19 38:1,16 39:11 44:20 46:2,13 46:21 47:2 48:9 50:6 50:13</p> <p><b>ABHE's</b> 21:7 26:9 31:1</p> <p><b>ABHE-</b> 16:3</p> <p><b>ability</b> 81:20 121:3 131:2 161:14 202:12 204:19 235:4 237:9</p> <p><b>able</b> 41:22 47:21 48:21 49:22 50:4,22 51:2 101:19 102:2 120:7 132:17 136:20,21 142:17 146:15 152:8 156:7 158:4 168:9 169:21 202:3 216:11 216:18 254:8</p> <p><b>above-entitled</b> 96:8 173:8 222:15 276:16</p> <p><b>above-mentioned</b> 13:3</p> <p><b>abruptly</b> 204:1</p> <p><b>absent</b> 167:10</p> <p><b>absolutely</b> 71:21 81:1 126:12 143:8 199:6 202:19 204:7 244:10 252:8 264:1</p> <p><b>abundance</b> 24:13</p> <p><b>abundant</b> 207:8</p> <p><b>academia</b> 105:13 119:5</p> <p><b>academic</b> 6:16 15:2 18:18 20:1 31:3,10 34:5 46:10 61:18 63:16 105:17 106:1 121:16 134:5</p> <p><b>academicians</b> 119:15</p> <p><b>academics</b> 118:12</p> <p><b>academy</b> 124:3</p> <p><b>accept</b> 71:19 133:21 165:6 259:10</p> <p><b>acceptable</b> 32:9 57:22 77:7 182:19</p> <p><b>accepted</b> 90:14 234:7</p> <p><b>accepting</b> 91:14</p>	<p><b>access</b> 147:9 151:21 153:6 194:7</p> <p><b>accident</b> 122:15</p> <p><b>accommodate</b> 31:6 42:4</p> <p><b>accommodation</b> 79:20</p> <p><b>accompanied</b> 53:2</p> <p><b>accompanying</b> 33:17</p> <p><b>accomplish</b> 228:21</p> <p><b>account</b> 122:17 123:12 259:14</p> <p><b>accountability</b> 109:5 182:6 213:21</p> <p><b>accounting</b> 212:18</p> <p><b>accounts</b> 163:16 197:7 214:22</p> <p><b>accredit</b> 6:3 75:12 107:17,21 108:12 204:9 247:14 248:14 248:19 263:21</p> <p><b>accreditations</b> 210:17</p> <p><b>accredited</b> 11:3,4 15:3 16:4 17:8 20:7,20,22 22:17 23:5,8,20 25:11 26:16 30:13 32:15,21 35:2 36:5 45:1 46:1 59:5 99:7 108:8 110:3 111:22 112:6 165:15 182:9,12 184:13 185:9 187:13,18 224:3 262:2</p> <p><b>accrediting</b> 5:20,21 11:5 44:7 79:19 96:13 98:13 99:8,21 100:7 107:3 108:7,10 110:18 113:1 117:15 127:6 167:19 171:4 178:8 205:20 223:8 226:10 227:9 230:6 242:11 250:1 268:3,7</p> <p><b>accreditor</b> 11:3 12:8 19:19 20:14 22:20 24:9 37:10 99:9 108:14 175:15 185:4 191:4,5 223:7 265:6</p> <p><b>accreditors</b> 192:11</p> <p><b>accredits</b> 10:20 20:2 98:21,22 99:2 108:2 175:16 176:17 183:8 183:19 188:12 223:21</p> <p><b>accumulated</b> 17:10 196:1</p> <p><b>accurate</b> 204:3</p> <p><b>ACE</b> 119:7,11</p> <p><b>achieve</b> 26:9 32:15</p> <p><b>achieved</b> 31:12 272:13 273:12</p> <p><b>achievement</b> 27:17</p>	<p>28:13,15 29:2,13 30:2 52:22 54:1 55:13,20 60:2 67:7 72:6,18 73:6,19 74:13,14 75:7 75:11 82:19 83:13,18 84:2,12 85:13 86:11 87:13,19 89:16 149:3 161:10 168:22 184:17 185:8 187:8 188:22 246:17</p> <p><b>achievements</b> 19:13</p> <p><b>achieving</b> 33:15 34:7,8 54:16 60:14</p> <p><b>acknowledge</b> 16:17</p> <p><b>ACP</b> 148:11</p> <p><b>ACPE</b> 2:12,15 4:10 98:14 99:9 100:1 104:4,9,14,21,22 105:10,22 106:2,5,5 106:12,21 107:8,14 108:2,12,14,17 109:18,20 110:10,11 110:12,22 111:4,14 112:1,11,18 113:16 114:15,18 115:5,12 115:15 130:16</p> <p><b>ACPE's</b> 107:13 109:7 111:2 114:2 115:2,17 115:21 116:1</p> <p><b>acquisition</b> 29:3</p> <p><b>Act</b> 5:11,13,18 41:7 176:13 224:5</p> <p><b>acted</b> 54:21 184:11</p> <p><b>acting</b> 81:5</p> <p><b>action</b> 24:6 25:7,7,8 32:9 38:15 40:3,4,6 56:12,20 57:9 68:1 111:5,15 113:16 114:9,11,18,20 115:22 125:17 126:14 126:17 128:21 144:9 144:10,19 145:8,20 163:12 211:14 226:5 235:8 243:19 245:3,6 258:17 259:19 261:19 261:20 262:9 263:10</p> <p><b>actions</b> 24:2,21 26:22 37:9 40:12 65:5 66:11 67:6 72:19 101:4 102:22 103:2 112:3 115:6 147:12 158:19 172:14 184:6 231:19 231:20 232:2 243:11 264:15 265:17 267:6</p> <p><b>activation</b> 106:2</p> <p><b>active</b> 136:12</p> <p><b>activities</b> 11:6 19:13 107:15 111:2 183:17</p>	<p>186:18 187:5 223:8</p> <p><b>activity</b> 23:10 110:18 136:13</p> <p><b>actual</b> 84:2,12 180:6 228:11 250:1 267:9</p> <p><b>ad</b> 259:1</p> <p><b>ADA</b> 222:7 223:1</p> <p><b>ADA-CODA</b> 3:10 4:18</p> <p><b>add</b> 42:19 70:19 78:18 82:14 91:22 92:19 130:12 142:2 150:17 154:7 214:10 218:13 218:16 228:4</p> <p><b>add-on</b> 246:6</p> <p><b>added</b> 68:5 245:10 263:8</p> <p><b>addition</b> 6:15 35:14 36:8 75:3 82:17 100:19 111:14 115:12 184:13,15 214:14</p> <p><b>additional</b> 17:18 36:15 68:15 81:20 102:13 107:14 110:17 111:12 111:18 112:1,18 131:10 154:5 168:7 214:12 269:5</p> <p><b>Additionally</b> 184:22 256:9</p> <p><b>address</b> 10:3 27:3 32:22 110:18 113:12 114:12 115:5 124:22 125:3 126:21 135:8 137:4 138:20 139:8 140:10 144:4 145:18 148:6 152:14 161:22 179:1 184:17 192:19 199:7 233:1</p> <p><b>addressed</b> 30:21 57:7 58:11 116:11 117:7 124:9 126:17 159:19 193:3</p> <p><b>addresses</b> 116:4</p> <p><b>addressing</b> 25:17 50:8 76:13 81:11 86:15 88:8 206:8</p> <p><b>adequate</b> 112:15 134:9 159:16 218:10</p> <p><b>adequately</b> 125:4</p> <p><b>adjustments</b> 111:19 157:6 217:20</p> <p><b>administered</b> 224:6</p> <p><b>administration</b> 43:14 76:15 109:3 273:1</p> <p><b>administrative</b> 53:15 110:1 225:9 229:4</p> <p><b>administrative-</b> 240:16</p> <p><b>administrators</b> 230:5</p> <p><b>admire</b> 42:22</p>

**admission** 153:19,20  
154:2 155:10 156:11  
258:1  
**admissions** 156:4,16  
156:22 257:22 258:2  
**admit** 155:20  
**admitted** 88:2 122:2  
149:9  
**adopted** 113:3 174:17  
205:6  
**adult** 21:14,22  
**advanced** 223:11,12  
238:14,15 248:6,14  
**advancement** 25:21  
26:5 107:2  
**advances** 133:8  
**advancing** 17:7  
**advantage** 152:7  
167:18  
**adverse** 101:4 102:22  
112:3 113:16 114:11  
114:17 115:6 158:19  
172:14 231:20 232:1  
243:11 245:3,6  
261:20 262:9 263:10  
265:16  
**advertising** 257:8,12  
258:9  
**advice** 6:11 212:20  
**advised** 259:5  
**advises** 6:9  
**Advising** 9:10  
**advisory** 1:3,8,11 5:5  
5:12,14 7:6 9:6 27:14  
82:7 131:1 203:4  
235:2 252:13  
**advocate** 9:7  
**affect** 215:17  
**affirmation** 183:2  
**afternoon** 104:17  
172:22 177:5,21  
221:3,12,14,19 233:3  
275:4,6  
**AGC** 225:21  
**age** 249:13  
**agencies** 5:19,20,21  
6:17 9:14 69:6,7  
75:19 84:8 99:8  
117:15 125:21 127:6  
131:8 161:2 164:20  
164:22 165:4 168:3  
168:12 169:14 172:22  
176:3,12 182:7 200:2  
212:10 221:7 230:6  
236:18 257:5 268:3,7  
**agency's** 9:18 11:12  
12:12,15,17 13:4,14  
13:19 19:6 23:11

35:22 39:6 71:16  
84:20 91:21 100:2,6  
100:18,21 113:20  
157:15 158:8,10  
165:14 168:20 171:3  
176:2 178:7,18,22  
218:9 223:8 225:19  
226:8  
**agency-accredited**  
235:20  
**Agency-based** 163:17  
**agenda** 9:15 30:16  
39:22 271:21 272:7  
**aggregate** 21:7 187:22  
**ago** 57:21 137:14  
199:15 202:5 259:6  
**agree** 71:3 91:1 92:21  
93:3 127:5 164:18  
165:19,20 170:21,22  
239:19 240:1 269:19  
**agreeing** 94:9  
**agreement** 68:3 69:1  
268:5  
**Ah** 133:19  
**ahead** 36:21 207:1  
239:16  
**aid** 6:13 44:4 176:13,22  
255:3,5,7,9,18 256:18  
**Alan** 2:1 5:8  
**Albrecht** 3:11 232:17  
233:6 239:10  
**alert** 66:18,19 245:17  
**align** 203:15 235:9  
**aligns** 241:14  
**Alioto** 1:12 92:21 93:11  
165:19 166:2 171:6  
175:8,11 179:20  
180:6,17 189:16  
190:20 191:12 192:1  
192:10,17 193:4,10  
193:15 194:4 195:4  
195:20 196:15,19,22  
197:8,14,22 198:11  
198:13 206:22 207:3  
218:21 219:13 270:3  
276:6,12  
**allied** 223:13 248:16,18  
251:22 254:18 271:7  
**allocation** 212:18  
**allow** 203:1 208:13  
236:12 242:10 258:12  
260:18  
**allowed** 66:21  
**allowing** 235:12  
**allows** 224:2 234:9  
**amazing** 50:7  
**amend** 174:4  
**amended** 5:11,13 78:11

83:7  
**amendment** 71:20  
77:10,11 78:12 79:14  
84:13 90:4,5,9,10,11  
90:12,13,14,17,20  
91:10,11,15,18  
174:17,20  
**amendments** 91:6  
**American** 3:9 4:17 7:12  
48:20 105:19 107:20  
119:1 132:1 182:3  
222:22 224:21 254:4  
**American-serving**  
20:10  
**amount** 98:10 135:12  
190:11 206:15 253:15  
**amounts** 120:9 121:2  
**analysis** 13:5,17 110:19  
113:13 114:13,14  
115:12 116:1 122:9  
124:6 125:9 130:4  
151:10 153:9 156:8  
156:10 157:7 235:17  
238:5 239:7  
**analyst** 97:7,11,14,18  
97:20 98:1 100:3  
189:7 201:18  
**analysts** 199:8  
**analyzing** 64:5  
**and/or** 33:8 228:12,13  
228:16 231:10 236:7  
242:4,10  
**Angela** 78:12,17,19  
81:17 85:8,10 86:1  
87:9 88:13 96:18  
213:4  
**anniversary** 16:22  
**announced** 113:6  
**annual** 12:19 17:17  
22:20 26:6,8 27:18  
28:6 32:1 33:7,13  
34:2,3,22 44:11 45:19  
76:17 121:12 122:5  
124:13 140:5 182:22  
186:9,20 187:2,10,19  
188:8 190:12 192:7  
192:14,21,22 193:13  
234:17 253:11 255:2  
255:22 256:3  
**Annualized** 20:5  
**annually** 17:22 19:6  
**anonymous** 39:14  
258:22 259:2,9,11,16  
259:17  
**answer** 36:16 42:20  
47:2 83:17 88:22  
121:6 150:14 153:5  
159:6 190:18 212:22

213:8 217:15 239:10  
247:15  
**answered** 37:1  
**answering** 116:16  
**answers** 206:17 260:11  
**anticipate** 64:17 66:8  
66:10  
**anticipated** 30:8 53:12  
**anybody** 60:16 81:11  
213:10  
**anymore** 205:21 218:14  
**anytime** 124:13 201:21  
**anyway** 246:22  
**apologies** 51:15 66:1  
67:12 264:12  
**apologize** 177:20 254:7  
255:20 261:2  
**app** 191:10  
**appealable** 245:4,6  
**appeals** 135:9  
**appear** 25:5 133:19  
**appearance** 23:11  
**appeared** 53:10  
**appears** 177:14 236:12  
**applaud** 81:4 87:21  
88:7  
**applicable** 268:1  
**applicant** 23:22 33:5,11  
154:11 245:4  
**applicants** 17:18 28:7  
60:16  
**application** 9:18 82:1  
85:14 86:7 120:11  
179:9  
**applied** 33:4 77:22  
149:8 197:20 234:2  
268:8  
**applies** 234:14 248:3  
**apply** 74:16 197:18  
237:6 268:3,6  
**applying** 75:10 78:6  
88:12,20 169:3  
**appoint** 119:9  
**appointed** 18:15 105:11  
118:22 119:12  
**appointing** 119:7  
**appraiser** 275:5  
**appreciate** 9:12 40:22  
42:22 47:14 58:3,4  
73:1 80:18 87:8 96:3  
135:6 137:5 148:22  
173:18 181:20 188:15  
189:1 216:4 271:13  
**appreciating** 130:2  
**appreciation** 16:6  
106:14  
**approach** 17:15 27:10  
118:2 131:7 252:5

257:5  
**approaches** 42:6  
**appropriate** 29:9 34:15  
 40:12 47:16 72:19  
 78:5 82:18 112:13  
 157:6 164:15 185:11  
 187:4 188:6 242:12  
 246:11  
**appropriately** 78:1,6  
 170:1  
**appropriateness** 55:19  
**approval** 5:19,21 39:10  
 50:1 195:8 244:2,8  
 245:8,10,14 246:7  
 250:16,22 261:6  
 262:13 263:4,13  
**approve** 71:5,15 244:4  
**approved** 24:1 33:11  
 68:18 91:10,17 216:5  
**approving** 189:4  
**approximate** 190:11  
**approximately** 20:6  
 23:7 24:2 99:3 108:3  
 172:18 238:13  
**April** 12:22 13:1 39:7  
 114:12  
**area** 24:19 25:18 28:21  
 37:18 52:2,21 61:7  
 67:8 75:13 82:4 94:19  
 100:22 129:16 131:14  
 140:9 150:5 151:9  
 192:19 225:8 260:1  
 263:5  
**areas** 30:18 33:19 62:1  
 102:11 125:10 128:10  
 128:12 191:8 200:14  
 224:1 268:2,2  
**arose** 16:15  
**art** 7:2 43:2 76:7 90:22  
 98:8 139:3,19 212:12  
 221:17 262:4  
**Arthur** 1:9,11  
**articulates** 31:8  
**Artis** 1:14 8:9,9 93:14  
 166:5 170:5,19 171:8  
 219:15 270:5  
**asked** 54:18 55:7 56:1  
 56:10 65:19 124:5  
 200:4,20 201:6 252:6  
 260:12  
**asking** 32:11 55:8 59:6  
 73:4,10 86:18 91:12  
 163:10 213:1 229:4  
 255:18  
**asks** 32:22 236:2  
**aspects** 47:7 51:9  
**assembly** 18:14  
**assess** 61:22 67:15

156:4  
**assessment** 12:14  
 13:13 14:5 17:19 24:4  
 24:8 26:20 27:4,7,9  
 27:17,20 28:1,3,9,15  
 35:16 36:8 53:14,19  
 54:4,17,19 60:9 61:12  
 61:20 62:18,19 67:14  
 71:17 156:19 157:7  
 250:4  
**assessment-related**  
 30:21  
**assign** 169:18  
**assigned** 9:17 238:17  
**assigning** 239:4  
**assignments** 238:22  
**assist** 25:16 27:15 33:8  
 35:12 135:1 154:5  
**assistance** 16:8 27:14  
 116:15 224:10  
**Assistant** 2:16 181:3  
**assisting** 187:3 223:14  
 248:19 256:17  
**assists** 34:9  
**associate** 2:9,10,12,19  
 2:21 3:11 14:1 15:17  
 15:19 105:16,22  
 110:21 181:16  
**associated** 193:1  
 251:19  
**Association** 2:7 3:9 4:5  
 4:17 8:19 10:11,19  
 12:6 14:19 36:11 71:6  
 105:19 132:1 175:14  
 181:6,11 207:17,19  
 208:5,11,22 211:16  
 224:22 254:5  
**associations** 164:13  
 222:22  
**assume** 156:12 207:18  
 215:16 240:20 243:12  
 260:20  
**assumed** 153:13  
**assuming** 32:14 57:6  
 57:20 190:22 255:12  
**assure** 35:18 36:3  
 106:22 116:10  
**assuring** 118:7  
**asterisk** 22:4  
**at-risk** 193:9  
**attained** 223:18  
**attempt** 61:4,9,9 249:19  
 250:7,10  
**attend** 51:2 247:19  
 249:2  
**attendance** 25:22 26:7  
 97:3  
**attendees** 28:4

**attending** 20:19  
**attention** 33:18 85:17  
 137:6 151:18 257:14  
 258:18  
**attest** 216:22  
**attorney** 212:21  
**attract** 50:22  
**attrition** 122:6,12  
**audible** 159:2  
**audio** 78:21  
**audit** 187:19 192:14,22  
 193:11,14,15,16,17  
 193:22 194:2,3  
 207:22 209:13 210:4  
 210:6  
**audits** 211:6  
**AUDRA** 2:19  
**August** 226:1  
**Ausdle** 1:19 9:1,2 95:22  
**auspice** 208:14  
**authorities** 6:1  
**authority** 130:6 135:7  
**authorization** 6:18  
**authorized** 6:10,14  
**authorizes** 6:16  
**automatically** 153:1  
**automotive** 175:22  
**availability** 16:14 194:7  
 274:18  
**available** 6:20 30:9 59:4  
 108:21 113:17 115:1  
 133:10 159:17 238:22  
 254:12,21 256:12  
 272:10 273:14,19  
 274:1  
**avenues** 195:1  
**average** 21:8,9 22:15  
 23:4,7 41:13 124:2  
 132:3,8 140:13,14  
 253:18 254:9  
**averaged** 17:21  
**averages** 24:2 44:9  
**avocation** 28:19  
**avoid** 257:10  
**awarded** 109:9  
**aware** 61:1 70:17  
 119:11 157:13 252:22  
 256:16 272:16  
**awkward** 173:19

---

**B**


---

**B** 8:15 53:9 55:4 81:18  
 89:5 95:18 98:19  
 101:18 102:18 103:8  
 103:21 117:1 118:16  
 119:18 125:19 126:22  
 131:6 133:4,17 137:5  
 138:2,5,9 158:2

159:13 160:12 165:8  
 167:22 168:12 170:6  
 170:11 172:8 173:15  
 174:11,21 175:3  
 215:7 220:15 239:16  
 250:13 253:11 254:15  
 255:17 256:15 258:19  
 260:2 269:2,4,17  
 271:5 273:17  
**bachelor** 14:1  
**back** 39:6 51:12,15  
 58:20 59:5 67:21 72:8  
 72:16 73:22 76:3,12  
 76:14 85:3 86:14  
 90:11 91:5,18 92:2  
 96:11 98:4 118:10  
 139:12 149:2 154:1  
 155:1 161:3 162:13  
 162:15,20 163:13  
 164:1 173:1,6,7,11  
 190:15 195:10 200:6  
 201:4 205:3,8 209:14  
 222:14 241:5 267:15  
 268:12 273:1  
**background** 119:17  
 127:22 231:13 243:5  
**backlog** 50:2  
**bad** 44:16 195:21  
**balance** 52:13 140:14  
**balances** 213:21  
**ball** 84:21  
**bank** 194:22 214:22  
**bar** 153:20  
**based** 12:17 13:3 30:1  
 38:22 39:13 42:6,8  
 43:19 48:12 58:7  
 59:20 80:8 81:5,9  
 100:17 132:8 157:6  
 158:9 159:1 178:17  
 185:5 186:19 203:20  
 225:18 237:18 239:7  
 240:20 249:19 268:20  
**bases** 240:12  
**basic** 225:8  
**basically** 205:4  
**basis** 114:10 133:1,7,10  
 140:5 183:15 190:12  
 192:14  
**BCPS** 2:16  
**bearing** 275:22  
**Beatty** 2:8 14:12,16,21  
 37:12 40:21 43:8  
 44:17 45:16 47:19  
 48:6 49:12 58:4 63:12  
 64:21 66:16 68:4 69:2  
 69:17 70:11  
**Beatty's** 60:5  
**beginning** 61:6 118:4

202:20 216:10  
**begins** 126:10 221:9  
**behalf** 14:19 36:11  
 98:11 100:2 104:19  
 189:9 271:14  
**behold** 128:4 154:1  
**believe** 53:3 66:1 75:9  
 110:13 116:2 202:19  
 229:1 232:19 235:11  
 239:1 241:4 242:9  
 244:21 252:8,19  
 261:13,18 268:15  
**believes** 144:1 231:13  
 236:1,17  
**benchmark** 123:10  
 142:10 153:17 256:10  
**benchmarks** 122:6  
 154:2  
**Benedict** 8:9  
**benefit** 251:12  
**Bernie** 272:19  
**best** 27:19 36:3 47:21  
 118:14 122:2 130:20  
 153:3 260:9 273:2  
 274:9  
**better** 37:7 52:16 76:1  
 84:17 141:3 142:20  
 151:22 165:2 171:6  
 208:3 246:16  
**beyond** 63:5 84:18  
 103:21 114:19 216:3  
 248:10  
**Bible** 10:20 29:3 46:19  
 51:3  
**biblical** 2:7 4:5 10:12  
 10:20 12:6 13:22  
 14:20 17:3 19:21 29:1  
 36:11 71:6  
**big** 119:19 248:13  
**bigger** 273:4 275:6  
**bills** 214:2  
**bit** 52:15 60:1 61:19  
 88:18 120:22 123:2  
 135:5 140:22 141:8  
 145:16 150:8 155:6  
 169:19 190:15 194:11  
 208:3 216:8,14,17  
 243:22  
**black** 144:13  
**blueprint** 123:13  
**Blum** 1:13 9:9,9,9 67:20  
 68:19 69:3 70:8,15  
 77:11,19 87:8 93:16  
 161:1 166:8 167:2  
 168:19 171:10 219:17  
 223:2,5 226:18  
 227:13 228:9 231:17  
 232:5,20 239:18

241:17 243:7 246:15  
 249:9 250:5 264:12  
 266:10 268:9,18  
 269:3,9 270:7  
**blurb** 137:16,20  
**board** 26:12,15,18  
 100:19 104:22 109:11  
 109:14 111:11,17  
 115:14,14 117:14,14  
 117:19 118:5,17,20  
 119:15 121:10 122:19  
 122:22 123:4 124:5  
 124:15,17 125:16  
 126:18 127:10 128:21  
 129:10 130:9 131:1,3  
 136:3,4 142:12  
 143:16 178:20 199:19  
 235:3 252:15  
**board-certified** 248:8  
**Boards** 8:19 128:10  
**Bob** 8:14,15 75:1 79:12  
 81:16 83:6 87:7 89:3  
 92:2 94:10,17 95:17  
 116:21 138:17 159:11  
 165:6 168:8 172:7  
 173:13 212:7 215:6  
 216:1 220:14 223:4,5  
 239:15 246:18 250:12  
 268:17 271:4,10  
**bodies** 113:1 205:20  
 227:12,12  
**body** 79:19 90:17  
 167:20  
**book** 253:13  
**bootcamps** 141:10  
**Booth** 1:13 8:5,5 84:16  
 93:20 94:4 166:10  
 171:12 219:19 270:9  
**borrowing** 141:8  
**boss** 127:16  
**Boston** 1:14 7:11,11  
 43:7 45:15,22 47:3,4  
 48:4 76:7 77:7 78:8  
 91:13 93:22 94:5  
 139:18 166:13 171:14  
 212:8 219:21 270:11  
 275:18  
**bounce** 51:12 140:22  
 150:8  
**Bounds** 2:2 71:14  
 74:19 78:14 96:21,22  
 97:9,12,16,19,22 98:3  
 98:8 106:14 189:8  
 191:9 218:3 230:22  
**Bowens** 233:11  
**box** 157:14 194:22  
**Boyer** 2:12 105:21  
 106:2 110:10,17,20

110:21 116:19,20  
 117:2 123:5 126:12  
 127:14 134:19 140:17  
 142:13 145:5 147:15  
 147:20 148:2,10  
 150:6 152:2 154:8  
 156:14  
**branch** 68:15 111:10  
**break** 50:9 96:5 97:5  
 210:4 222:12,14  
**brief** 101:2,6 103:1  
 106:9  
**briefing** 9:20  
**bring** 86:14 204:13  
 253:4,9 272:1  
**bringing** 52:9 131:9  
 155:5  
**broad** 234:6  
**broader** 143:16  
**broken** 209:9  
**brought** 155:15 250:15  
 258:17  
**Bruce** 233:8  
**budget** 6:19 195:5  
 209:14 211:1  
**bunch** 250:19,22  
**burden** 89:8 164:9  
**burdensome** 83:20  
**Bureau** 109:3 132:9  
**Bush** 273:1  
**business** 46:16 141:13  
 155:3

---

**C**

---

**C** 97:10 99:17 102:16  
 102:19 103:13 157:20  
 157:22 158:4,7 159:5  
 180:16  
**C-O-N-T-E-N-T-S** 4:1  
**calendar** 47:13  
**call** 93:8 124:11 161:14  
 205:15 219:12 245:13  
 269:5 270:1  
**called** 89:11 142:11  
**calling** 161:11  
**camera** 177:7,8,14,18  
**campus** 21:8 61:16  
 68:15 184:15  
**campus-based** 10:22  
**CampusEdu** 18:6  
**Canada** 11:7  
**Canadian** 20:4  
**candidacy** 69:19,20  
 184:2 204:14,17  
**candidate** 13:21 17:18  
 23:13 25:8 45:7 59:13  
 69:17,22 112:2,6,8  
 176:19

**capacity** 128:17  
**care** 19:7 127:22 137:6  
 169:9,11,12  
**career** 21:21 28:20 29:6  
 176:4 181:19 184:1  
 184:20 185:5 187:14  
 195:17 196:13 201:19  
 214:13  
**careers** 28:18 149:7  
 175:20  
**careful** 16:12 19:3  
 79:18 164:19  
**carefully** 73:12 94:14  
 123:9 152:13  
**CARES** 41:7,15  
**Carolina** 8:7,10  
**carry** 206:5  
**carrying** 54:14  
**case** 53:16,21 55:4  
 59:14 158:12 163:6  
 221:9,20,21 227:18  
 268:8 269:6  
**cases** 27:6 58:13 84:8  
 136:18 137:4 141:7  
 152:19 188:4 247:22  
 249:4  
**cash** 22:8 194:8  
**catch** 121:19 133:13  
**category** 193:9  
**CATHRYN** 3:11  
**caught** 60:17  
**cause** 25:11 70:7,14  
 122:8 124:6 125:9  
 151:10 153:9 195:9  
 246:10,11  
**caused** 196:16  
**causes** 82:20  
**causing** 226:21  
**caution** 250:18  
**celebrated** 16:21  
**centered** 113:14  
**century** 8:16 24:15  
**CEO** 8:13  
**certain** 44:11 47:7  
 104:9 123:19 126:10  
 140:18 150:15 151:9  
 151:9 196:3 247:8  
**certainly** 46:3,6 47:13  
 156:17 180:10 198:18  
 232:22 241:10 245:17  
 265:1  
**certainty** 88:11  
**certificate** 46:9 184:14  
**certificated** 175:21  
**certificates** 14:1,2  
 47:10  
**certification** 6:12 26:9  
 26:10 249:5,7



<b>certify</b> 107:18	208:14 215:1 269:8	233:6,15 234:2,20	<b>comfortable</b> 72:5
<b>certifying</b> 183:9	<b>choosing</b> 262:1	235:2 236:13,17	205:11
<b>cetera</b> 118:19 257:14	<b>chosen</b> 189:20	238:5,13,17,19,20	<b>coming</b> 43:4 127:9
257:18 264:9	<b>Christan</b> 181:14	239:8 244:12,13,16	157:3 190:9 191:13
<b>CFOs</b> 18:18 26:5	<b>Christian</b> 2:21 180:11	246:2,6,10 248:12	191:14,20 211:15
<b>Chairman</b> 3:13 90:7	<b>chronology</b> 246:13	254:2,13 261:9,22	<b>comma</b> 236:8 242:3,10
99:17 104:17 167:17	<b>churches</b> 24:11 42:16	262:2 263:3 264:2	269:18,20
206:18 211:12 217:22	<b>circumstances</b> 32:14	268:8	<b>commend</b> 43:8
228:3 232:12	<b>citation</b> 147:13 246:1	<b>CODA's</b> 227:18 232:17	<b>comment</b> 11:14 74:11
<b>Chairperson</b> 7:2	<b>citations</b> 216:13	233:8 234:8 235:5,17	84:7 86:1 94:8,9
<b>challenge</b> 152:18	<b>cited</b> 44:14 114:10	238:4 262:9	101:13 112:19 114:2
185:18 231:6	<b>claim</b> 182:10,11	<b>CODA-accredited</b>	138:17 155:1 156:10
<b>challenges</b> 16:11	<b>clarification</b> 44:18 81:8	249:2	157:14 160:22 161:4
101:22	81:14	<b>code-accredited</b>	161:18 162:10,12
<b>challenging</b> 185:10	<b>clarified</b> 208:2	247:19	164:15 165:18,19,21
<b>chance</b> 75:3 84:14	<b>clarify</b> 64:2 74:16 87:10	<b>codify</b> 202:21	166:3,6,8,11 167:20
<b>change</b> 2:10 15:20 27:5	88:1 174:14 215:9	<b>cohort</b> 21:16,19	168:18 169:8 170:3
32:20 33:11 42:8 50:8	221:17 275:18	<b>cohorts</b> 21:15 22:11	179:12 190:2 199:3
50:11 63:18 86:22	<b>clarifying</b> 77:20 88:17	26:15	201:16 202:3,17
92:1 135:4,16 146:11	92:3 248:13 258:14	<b>colleague</b> 191:17	218:2 235:16 268:14
151:5 173:19 184:12	<b>clarity</b> 86:19	217:11	271:10
216:15 259:4 268:5	<b>CLARK</b> 1:14	<b>colleagues</b> 105:9	<b>commentary</b> 243:21
272:8	<b>Claude</b> 1:12 7:18,19	<b>collect</b> 45:17 254:5,13	<b>commentators</b> 251:4
<b>changed</b> 48:18 86:8	79:12 95:15 163:21	255:16,21	<b>commenters</b> 10:3,6,8
146:7,12 159:21	172:5 175:8,10	<b>collected</b> 31:22 35:13	268:16 272:10,12
258:21	189:13 198:15 199:6	<b>collecting</b> 64:4 242:19	273:14,18 275:14,15
<b>changes</b> 24:1 36:1 42:3	202:18 205:15 212:3	<b>collection</b> 35:12	<b>comments</b> 9:22 10:2
50:12 51:15 64:9	212:7 216:2 218:19	<b>college</b> 8:6,10 9:3 15:3	33:21 68:5 70:17,18
123:12 151:14 153:19	220:12 271:2	15:12 47:5 133:9	85:4 87:9 93:5,6 95:1
184:14 234:17 235:9	<b>clean</b> 258:11	144:13,16,18 152:17	104:6 113:21 115:18
256:7	<b>clear</b> 45:14 53:21 129:4	175:14	157:12 159:3,5
<b>changing</b> 35:7	129:16 229:15,22	<b>colleges</b> 7:21 8:20	169:16,17 177:2
<b>characteristic</b> 41:20	230:7 234:12 245:22	10:21 19:20 51:3	180:14 200:6 202:12
<b>characteristically</b>	255:14 260:11 262:11	112:21 132:1 181:11	203:20 213:11 218:17
150:7	263:12	196:17 207:19 208:11	268:12 269:22
<b>characteristics</b> 200:9	<b>clearer</b> 47:1	208:18,22 211:16	<b>commission's</b> 31:2
206:4 207:11 253:2	<b>clearly</b> 52:19 57:10	251:20	<b>Commissioner</b> 213:20
<b>characterizes</b> 129:11	145:16 225:16 230:15	<b>Columbia</b> 8:10,13	<b>commissioners</b> 19:1,5
<b>charge</b> 135:22 181:17	238:6	176:8	58:17 203:3 213:15
<b>charges</b> 6:15	<b>click</b> 134:2 145:7,19	<b>combination</b> 87:10	235:4
<b>Charitable</b> 26:14	148:2,10 201:20	242:6,13	<b>commissions</b> 18:13
<b>Charity</b> 2:4 97:9,10	<b>clicked</b> 163:1	<b>combine</b> 210:21	175:13 207:17 209:2
98:17 99:16,19	<b>clinical</b> 236:22 237:1	<b>combined</b> 45:20 46:22	209:4 210:2,7 211:13
101:16,19 106:17	247:20	209:10,19	211:16 213:16 215:10
139:12 157:19 159:10	<b>close</b> 195:14 196:17	<b>come</b> 46:7,9,10 48:20	<b>committed</b> 106:21
<b>chat</b> 157:14	204:1 257:17 262:1	49:21 50:1 63:2 72:8	<b>committee</b> 1:3,8,11 5:5
<b>check</b> 138:2 194:19	269:4	72:16 73:15,17,21	5:13 7:6,22 10:9 12:3
<b>checking</b> 273:17	<b>closed</b> 226:5	76:3 80:2 88:6 117:8	14:18 18:16 35:19
<b>checklist</b> 115:6,10	<b>closely</b> 199:8 258:4	124:15 128:12 135:3	36:14 74:20 79:1,8
146:8 159:22	<b>closer</b> 52:17 260:7	139:12 141:11 154:14	82:8 85:16 86:19
<b>checks</b> 213:21	<b>closing</b> 207:6 266:1,11	190:4 191:16 196:22	96:13,14 99:18
<b>Chief</b> 9:6	<b>closings</b> 195:6	210:16 246:4 251:13	104:18 116:7,10,17
<b>child</b> 128:5	<b>closure</b> 265:22 267:8,9	257:16 261:3 268:12	177:22 180:18 202:4
<b>chime</b> 121:7 229:10	<b>closures</b> 266:19	273:14	206:21 211:19 224:19
<b>CHIN</b> 2:19	<b>coaching</b> 25:16	<b>comes</b> 47:5 60:8 86:14	226:2,17
<b>choice</b> 221:2 262:8	<b>Coates</b> 177:2	177:3 213:16 243:4	<b>committee's</b> 14:8
<b>choices</b> 154:12	<b>CODA</b> 223:1,6 224:3,11	265:7	<b>committees</b> 5:15 203:4
<b>choose</b> 76:4 168:21	225:1 228:17 232:10	<b>comfort</b> 221:22	235:1 252:13

<b>common</b> 197:8,9	268:20	<b>confident</b> 116:11 241:8	<b>conversation</b> 48:1
<b>Commonwealth</b> 176:7	<b>compliant</b> 54:22 55:18	<b>confidentiality</b> 37:22	58:16 127:18 130:9
<b>communicate</b> 61:5,10	57:13 79:2,9,16 80:2	<b>confirm</b> 125:20 192:15	130:10 159:4,12
62:1 259:12	86:4 88:5,21 89:2	<b>conflict</b> 19:6,10	201:18 239:22 275:12
<b>communicated</b> 31:3	93:17 103:17 158:20	<b>confuse</b> 45:18	275:15
262:21	162:20 216:19 239:8	<b>confused</b> 102:13,15	<b>conversations</b> 51:16
<b>communicating</b> 60:11	246:3	211:5 212:9	67:17 129:12 143:15
<b>communication</b> 13:7	<b>complicated</b> 74:8	<b>confusing</b> 229:22	<b>convinced</b> 89:5
29:17 60:10 62:20	<b>complied</b> 239:2	<b>Congratulations</b>	<b>cooperative</b> 200:1
<b>communities</b> 234:6	<b>complies</b> 88:12 179:7	217:19	<b>coordinating</b> 181:17
<b>community</b> 9:2 137:18	<b>compliment</b> 138:14	<b>conjunction</b> 87:4	<b>copy</b> 145:13
183:3	149:11	107:20	<b>Corder</b> 2:3 97:20,20
<b>compare</b> 256:13	<b>comply</b> 116:12 158:15	<b>consequences</b> 251:13	<b>core</b> 19:20
<b>compared</b> 44:8	240:18	<b>consider</b> 74:3 76:10	<b>corporate</b> 128:16
<b>compilation</b> 256:7	<b>complying</b> 158:13	103:15 116:7 161:8	212:11
<b>compile</b> 256:4	242:22	172:13 236:3 239:5	<b>corporation</b> 208:17
<b>compiled</b> 136:8	<b>component</b> 46:10,10	256:12 259:6,7	209:11 210:3
<b>complainant</b> 134:11,16	127:5 129:7 156:5,19	<b>consideration</b> 125:17	<b>corporations</b> 128:15
134:22 136:18	<b>composite</b> 22:19 32:3	<b>considered</b> 77:12,15	<b>correct</b> 56:17 60:5 80:6
<b>complained</b> 236:22	<b>composition</b> 229:21	119:8 176:19 213:6	92:14 94:3 126:12
<b>complaint</b> 39:15 101:9	232:22 242:12	<b>considering</b> 49:2	146:3,3 160:12
134:12,20 135:15,19	<b>comprehensive</b> 26:17	<b>consisted</b> 200:9	196:18,21 198:12
226:3 231:7 259:1,16	28:8 30:4 34:20 35:15	<b>consistency</b> 110:14	204:7 208:21 217:17
<b>complaints</b> 11:13 39:22	37:3 56:2 62:20 111:5	129:3 130:20	227:6 232:4 241:1
133:19,21 135:3	136:6 137:1 179:4	<b>consistent</b> 19:4 185:7	245:2
136:4,7,12,17 137:7	202:9	193:2 234:9	<b>corrected</b> 217:14
179:13 235:5 258:22	<b>comprised</b> 109:11	<b>consistently</b> 140:9,11	<b>correcting</b> 187:7
259:6,9,11	<b>computer</b> 175:22	188:1 234:2	<b>correction</b> 200:18
<b>complete</b> 18:2 19:1	<b>concept</b> 162:1	<b>consists</b> 109:22	<b>correctly</b> 102:19 230:4
22:1 33:12 46:8	<b>concepts</b> 182:16	<b>constituents</b> 51:17	232:2
<b>completed</b> 26:17 64:22	<b>concern</b> 24:19 77:20	179:3	<b>correlation</b> 249:6
72:9 185:12 224:14	80:17 81:5 123:11	<b>constitute</b> 20:21	<b>correlations</b> 156:21
<b>completely</b> 89:12	124:10 125:10 130:5	<b>consultants</b> 84:10	<b>correspond</b> 259:8
<b>completers</b> 186:6	130:11 137:1 160:22	<b>consultation</b> 28:6	<b>corresponding</b> 164:8
<b>completion</b> 185:1	195:9 272:8 273:7	<b>consume</b> 151:17	<b>corroborating</b> 62:8
205:16 249:4	<b>concerned</b> 51:13 82:4	<b>consumer</b> 29:18 119:5	<b>cosmetology</b> 176:1
<b>compliance</b> 26:21 30:5	85:15 215:8,18 244:1	<b>contacting</b> 272:11	<b>cost</b> 198:3 207:3,6
32:17 33:2,9,16 34:10	<b>concerning</b> 29:15	<b>contemplated</b> 79:11	212:18
54:5,7,8,8,12 57:12	<b>concerns</b> 27:12 54:1	<b>contemplating</b> 239:21	<b>costs</b> 83:22 214:3
58:8 59:10,12 60:21	86:16 89:6 125:1	<b>contend</b> 243:2	<b>Council</b> 2:11 4:9 98:14
64:13,14 65:18 66:20	193:18,20	<b>content</b> 125:12 135:19	98:20 99:22 104:20
67:2 73:7,8 74:6	<b>conclude</b> 117:5 235:15	<b>context</b> 29:11 185:3	119:1
76:11 77:3 78:3,15	<b>concludes</b> 14:6 36:10	215:20	<b>counsel</b> 3:12 75:16
79:7 80:5,9 82:7,11	179:14	<b>continue</b> 42:9 69:21	82:13 85:11 212:9,20
82:18 83:3 85:2,3,18	<b>conclusion</b> 30:7 35:18	116:12 159:22 165:7	213:1,2,5 232:17
100:8,10,13 101:1,12	<b>concurrently</b> 236:21	180:2	<b>counseling</b> 46:16
102:4 103:4 109:17	237:4,13	<b>continued</b> 23:17 38:10	150:12
111:20 115:13 116:8	<b>condition</b> 222:22	38:14 100:12 111:19	<b>count</b> 20:5
126:1,3,7 138:22	<b>conditions</b> 25:4 32:17	114:2 178:11 219:4	<b>counted</b> 45:12
139:6 158:8,10,17,21	<b>conducted</b> 13:1 111:4	<b>continuing</b> 33:22 47:20	<b>counting</b> 209:12
159:14 160:7 162:14	224:13 225:15,22	51:5 107:18 173:12	<b>countries</b> 49:21 198:4
178:9,12,22 184:18	226:1,2 238:1	<b>continuous</b> 76:21	<b>country</b> 191:14
185:21 186:9,11	<b>conference</b> 27:22 28:3	186:14,21 188:21	<b>couple</b> 37:7 40:16
198:22 216:12,18	28:4 34:9,12 60:15	233:20 234:15	43:13 151:1 199:10
217:16,16 219:5	<b>conferences</b> 25:20 26:1	<b>contradict</b> 83:11	214:10 242:2 255:1
224:14 225:4 229:14	26:7 34:3,4,5	<b>contribute</b> 130:8	255:22 274:14
235:17 246:5 251:13	<b>confidence</b> 182:14	<b>control</b> 122:11	<b>coupled</b> 257:21
259:22 263:3,6,14	183:7	<b>convene</b> 274:4	<b>course</b> 18:6 40:17

49:10 53:18 75:6  
 122:18 124:20 129:22  
 136:3 169:9,12  
 183:16 256:1 260:19  
**covered** 111:16  
**covering** 223:22 240:12  
**COVID** 19:16 42:10  
**COVID-19** 193:21  
 197:15 198:5  
**CPA** 18:21  
**create** 269:18  
**created** 251:5 259:13  
**creating** 152:7  
**creation** 118:1  
**creative** 42:5  
**credentials** 17:10 32:4  
**criteria** 13:9 79:2 80:6  
 85:15,16 86:4 101:1  
 103:7 156:5,11,16,22  
 227:1 228:11 229:7  
 235:10 236:6,11  
 237:15 238:11 239:2  
 240:19 241:13 252:17  
 252:18  
**criterion** 77:21 101:8  
 108:16 116:4 158:21  
**critical** 92:1 123:6  
 236:2 237:10  
**CSS** 184:18  
**curiosity** 247:5  
**curious** 48:11,15 49:5  
 76:19,22 79:15  
 102:16 140:6 144:6  
 144:20 243:10 249:13  
 250:11  
**current** 21:17 35:5  
 47:13 52:3 112:17  
 113:3 143:12 176:2  
 186:17 188:5 190:2  
 199:17 200:11 222:20  
 232:16 233:11  
**currently** 12:9 18:5,21  
 34:19 35:15 40:5 45:8  
 59:20 60:18 69:15  
 70:12,14 80:12 99:2  
 112:1 176:17 184:2  
 187:12 202:1 223:22  
 268:22  
**curricular** 151:4  
**curriculum** 121:9  
 125:12 150:22 151:5  
**curtailed** 198:6  
**customarily** 150:15  
**customary** 162:18  
 163:5,6  
**cut-off** 192:4

---

**D**


---

**D** 1:16 8:2 74:10 83:10  
 95:5 142:2 148:15  
 149:2 151:15 153:5  
 153:14 155:17 157:8  
 166:17 171:18 191:19  
 210:11 220:3 270:15  
**Daggett** 97:2  
**Dan** 2:21 181:2,15  
**danger** 167:22  
**dangerous** 167:21  
**dashboard** 20:14 21:2  
 21:17 22:2,7 41:11  
 43:11,12,17 44:19  
 45:13,17,19 46:5,19  
 76:14 206:7,9  
**dashboard's** 22:15  
**data** 19:13 20:14 21:2  
 22:20 24:16 31:22  
 32:13 35:12,13,14  
 41:6 47:5,22 52:10  
 56:15,17 64:5,5,8  
 65:2 66:1 67:4,14,16  
 76:13 84:9 109:4  
 132:12 133:9 149:6,6  
 149:16 187:10,22  
 198:21 238:9 239:7  
 253:13 254:6,12,17  
 254:21 255:16,21  
 256:3  
**data-driven** 188:19  
**dataset** 21:17  
**date** 30:2 52:9 100:14  
 178:14 225:13  
**dated** 55:6  
**dates** 272:7  
**Dave** 8:3  
**David** 1:15 8:1 74:9  
 81:16 83:9 84:17 85:5  
 86:4 87:11 89:6 95:4  
 149:1 166:16 171:17  
 220:2 270:14  
**David's** 87:12  
**Dawn** 2:16 106:3  
**day** 5:4 7:5 39:12 85:3  
 114:8 115:5,9,21  
 221:8 254:1 271:15  
 271:16,17  
**days** 101:4 113:18  
 114:16  
**DDS** 223:10 247:17  
 248:10  
**deadline** 79:5  
**deal** 17:16 50:18 53:11  
 150:12 173:4 251:8  
**dealing** 191:1  
**deals** 199:1 206:1  
**dealt** 40:20  
**dean** 2:15 15:11 105:1

105:16 135:21 148:7  
 252:2  
**dean's** 136:1  
**deans** 136:15  
**debt** 120:9 121:3,21  
 131:16 132:3,11,17  
 133:10,14 160:5,8,17  
 164:8 165:17 168:4  
 168:11,13,15 169:6,9  
 169:11,12 172:9,12  
 196:6 206:3 253:18  
 254:9,16 271:6  
**debts** 195:21,22  
**decide** 69:6,7 87:21  
 265:12  
**decided** 205:4  
**decides** 122:12  
**decision** 19:4,8,13  
 23:10 50:10 62:2 74:5  
 82:10 83:1 100:9,12  
 100:15 113:16,19,20  
 114:4,8 115:18 130:6  
 131:2 178:10,12,14  
 191:7 196:5 215:16  
 219:6  
**decision-making**  
 188:20 227:11 235:20  
**decisions** 101:5 118:14  
 125:18 129:1 138:22  
 210:18  
**decrease** 41:18  
**decreased** 195:5  
**decreases** 41:19  
**dedicated** 110:9  
**deemed** 54:4,11 59:16  
 246:11  
**deems** 242:12  
**deep** 41:18 42:12  
**default** 63:6 132:11  
 164:7 187:16 192:1,2  
 206:3,5  
**defeat** 90:4,20  
**defeating** 153:3  
**defer** 163:9 189:22  
 194:10  
**deferred** 25:7,7,8  
**deferring** 27:5 164:12  
**deficiencies** 245:18,20  
**deficiency** 102:15  
 199:4 246:1  
**deficient** 33:3 102:12  
 103:11  
**define** 152:3 182:18  
 248:12 261:16  
**defined** 31:11 111:8  
 262:11  
**definitely** 40:11 66:17  
**definition** 31:2,6 227:19

229:13  
**degree** 2:13 46:12  
 56:21,22 98:22 99:2  
 107:9,10,19 110:8  
 111:1 119:20 154:18  
 162:3 196:13 223:11  
 248:10  
**degrees** 6:16 14:1,2,3  
 110:3 164:4  
**Delaware** 176:5  
**delay** 12:2  
**delayed** 121:17  
**delegate** 18:14  
**deletion** 184:14  
**deliberate** 19:4  
**deliberations** 6:22  
**delivery** 42:3 51:2  
**demands** 182:5  
**Demo** 222:22,22  
**demonstrate** 32:16  
 59:10 61:3 101:5  
 102:20 114:15 116:8  
 179:2 185:21 186:8  
 188:9  
**demonstrated** 86:7  
 92:22 115:13 116:9  
**demonstrating** 30:2,20  
 60:20 87:20 179:9  
**denial** 115:18 231:21  
 243:13 245:2 250:16  
**denied** 112:7 115:15  
 265:17  
**denominations** 42:16  
**dental** 3:9,9 4:17,17  
 223:6,10,12,13,14,15  
 223:16,17,22 224:21  
 224:22 232:14 233:5  
 233:17,21 234:2,3,3  
 234:10 247:16 248:3  
 248:6,16,17,19,19  
 252:1 253:1 254:4,9  
 254:10,18 256:9,16  
 263:21,22 264:6,7  
**dentist** 247:18 251:22  
**dentistry** 223:11 248:9  
 248:12 252:19,22  
 264:8 271:7  
**dentists** 248:7 264:9  
**deny** 250:22  
**department** 1:1 2:1  
 9:19 10:7,15 11:9,13  
 12:9,10,11,16 13:7  
 16:6 17:1 36:6,13  
 42:7 53:5 71:5 73:4  
 74:8 75:4,6 82:9,9,17  
 82:21 88:6 94:13  
 98:17 100:5,16  
 101:11 105:3,5,15

106:15 107:5,8,14 108:11,22 109:8 110:19 111:3 112:4 115:11 116:7,14 143:21 144:5 146:2 146:19 158:20 159:20 160:3,11,15 161:7 162:7 175:8 178:6,15 179:11,12 189:3 192:9,12,17 201:15 217:17 219:3,6 225:3 225:6,11,13 226:3,7,8 226:22 243:9 260:14 265:5 267:20	35:15 223:18 233:18 <b>development</b> 25:1,20 28:8 33:20 34:5 55:8 62:15 111:10,18 125:13 150:22 <b>deviation</b> 149:13 153:17 <b>deviations</b> 123:11 140:1 <b>devise</b> 235:8 <b>DeVos</b> 191:7 <b>dictate</b> 242:11,21 <b>difference</b> 261:11 <b>different</b> 26:2 40:15 43:15 49:7 86:11 119:9 162:19 200:8,9 200:22 216:7 231:4 241:18 242:14 243:8 247:14 253:18 257:2 262:18 268:2 <b>differentiate</b> 256:20 <b>differently</b> 40:16 155:2 <b>difficult</b> 47:8 84:18 128:2 133:5 253:7 <b>dig</b> 206:13 <b>diligent</b> 25:12 <b>diluted</b> 154:19 <b>direct</b> 12:14 13:13 14:5 36:8 71:17 79:20 81:10 85:16 126:6 135:8 145:13 149:5 241:15 <b>direction</b> 199:17 250:18 269:7,8 <b>directly</b> 28:16 115:8 135:21 254:2 <b>director</b> 2:1,2,8,10,13 2:13,14,16,19 3:14 5:9 14:13,22 15:17,20 16:19 96:22 104:4 105:10,12,22 106:1,4 106:12 110:22,22 230:11 232:10,14 244:13 <b>Director/Substantive</b> 2:9 <b>directors</b> 104:22 <b>directs</b> 141:2 <b>disadvantaged</b> 108:21 <b>disagree</b> 87:11 <b>disasters</b> 195:11 196:16 <b>discharge</b> 6:9 <b>discipline</b> 230:2 247:15 264:4,5 <b>disciplines</b> 120:4 247:13 248:15,18 249:3 253:19	<b>disclaimer</b> 272:6 <b>disclosure</b> 205:11 <b>discontinuation</b> 184:15 <b>discontinue</b> 262:4,8 266:5 <b>discontinuing</b> 261:22 262:7 <b>discovered</b> 80:19 81:13 <b>discuss</b> 25:6 <b>discussed</b> 47:12 131:19 153:15 221:12 <b>discussing</b> 48:3 90:9 273:16 <b>discussion</b> 10:9 47:12 66:17 71:12 77:18 94:15 95:2,3 117:8 125:6 143:22 157:15 165:12 169:17 219:10 219:11 221:13 239:20 269:16 272:1 274:17 275:2,8 <b>discussions</b> 103:7 124:20 125:15 135:18 250:2 <b>dismissals</b> 121:16 <b>disposal</b> 190:8 <b>disqualifies</b> 128:6 <b>dissertation</b> 15:5 <b>distance</b> 11:1 14:4 50:11,14,16 107:11 176:10 223:20 237:9 <b>distinct</b> 208:8,16 242:14 <b>distinctions</b> 54:10 <b>distinctly</b> 52:19 <b>distinguish</b> 261:19 <b>distribution</b> 149:15,17 <b>District</b> 176:7 <b>diverse</b> 109:11 <b>diversity</b> 29:7 31:7 35:9 118:5 <b>divide</b> 41:11 214:2 <b>DMD</b> 223:11 247:17 248:10 <b>doctor</b> 99:1 107:10 113:7 <b>doctoral</b> 110:3 <b>doctorate</b> 56:22 <b>document</b> 102:14 201:4 201:13 <b>documentation</b> 12:18 13:6 16:14 40:11 53:17 55:19 100:18 134:11 146:6,11 149:12 156:8 178:19 179:2,8 185:20 187:2 225:20 229:16 230:14 <b>documented</b> 186:5	<b>documenting</b> 34:9 56:1 <b>documents</b> 128:21 180:7 194:5 <b>doing</b> 42:9 47:10 55:1 72:10 76:20 80:1,14 81:13 84:3,5,14 87:5 92:4,6 124:16,17 131:11 141:15 150:21 151:3 155:2,7 161:16 167:5 169:1,1 190:3 197:11 200:3,4,5 211:8,9 235:11 250:1 250:17 251:14 259:16 260:9 262:20 266:14 266:16 269:5 <b>dollars</b> 109:9 <b>Donna</b> 2:5 96:18 <b>doors</b> 206:10 <b>downturn</b> 40:14 <b>downward</b> 51:9 <b>dozen</b> 205:14 <b>Dr</b> 12:4 14:12 15:8,12 15:16,19,21 16:7,11 16:18 43:8 45:22 47:3 48:6 49:18 58:15 59:21 60:5 70:17 97:7 98:6 104:4,14 105:9 105:11,21 106:2,3,8 110:10,10,12,16,21 116:20 117:2,13,20 137:12 181:1,5,7,9,14 190:1,6 194:14 214:11 232:9,15,18 233:4,6,8,11 241:2,6 261:13 264:2 <b>draft</b> 13:4 114:14 115:11 116:1 <b>draw</b> 205:17 237:21 <b>drink</b> 19:15,17 <b>drop</b> 83:13 155:14 205:12 <b>dropped</b> 72:3 153:21 167:13 <b>dropping</b> 133:15 <b>dual</b> 45:11 182:15 <b>due</b> 21:19 22:4 40:5 100:9 178:9,14 195:5 226:12 234:8 <b>dues</b> 194:18 195:3 196:3,7,10 207:7
<b>E</b>			
<b>E</b> 1:9,11,14 52:8,14,18 <b>earlier</b> 33:21 50:6 67:7 69:21 73:1 150:12 155:1 226:6 <b>early</b> 120:8 121:20 133:14 184:6 200:13			

221:8  
**earning** 143:4  
**earnings** 43:20 131:17  
 133:11,15 160:5,8,17  
 161:9 164:8 165:17  
 168:13 169:6,10,11  
 169:12 172:9,12  
 254:17,18 271:6  
**easier** 134:21  
**easily** 83:17  
**east** 138:1  
**Eastern** 173:7  
**easy** 134:1,14 137:12  
 227:18 230:12  
**echo** 84:16 170:5  
**echoed** 86:5  
**ECP** 145:8  
**ed** 48:15 208:6,12  
 215:11  
**EDU** 61:16  
**education** 1:1,1 2:1,7  
 2:11 4:5,9 5:11,22 6:2  
 6:12 8:13 9:10 10:12  
 10:20 11:1,9 12:7  
 13:22 14:5,20 17:2,4  
 29:1 33:22 34:6 35:7  
 36:12 40:14 48:13  
 49:3,13 51:7,22 71:6  
 98:14,21 99:22  
 104:20 106:16 107:1  
 107:5,11,16,18,22  
 109:10 110:5 112:14  
 112:15 118:8 119:1  
 156:1 159:21 175:16  
 176:10,13 182:3,17  
 183:3 189:3 192:18  
 200:13 223:10,11,12  
 223:13,14,15,16,17  
 223:20,22 229:17,17  
 233:21 234:3,4,10,15  
 237:6 238:10 247:16  
 248:6,15,16 252:4  
 253:1 254:4 256:9  
**educational** 6:4 14:4  
 20:12 31:12,20  
 176:10 183:1,4,9  
 234:22 256:14 263:2  
**educator** 15:2 227:2,10  
 227:14 228:11 230:12  
 231:9,10 237:2,14  
 238:7,16,21 240:3  
 242:21 260:15 268:22  
**educator/practitioner**  
 227:22  
**educators** 109:12 230:1  
 230:9,16 235:18  
 236:6,11,14,20  
 237:22 242:7

**effect** 146:7 151:14  
 263:10  
**effective** 113:4 186:4  
**effectiveness** 15:11  
 18:19 30:1 34:18  
 35:17 67:16  
**effort** 120:4 138:20  
 139:7  
**efforts** 81:5 116:8 141:4  
 271:13  
**eight** 22:14 55:11 56:11  
 111:7 136:9 141:22  
 142:3,6 156:18  
**eight-month** 55:7  
**either** 30:10 49:22  
 53:11 56:16 62:9  
 73:22 74:5 75:5 80:18  
 81:21 129:18 156:9  
 159:11 174:8 243:20  
 256:22 259:13 268:18  
 269:6 274:7 275:21  
 276:2  
**either/or** 241:13  
**elaborate** 153:12  
**elected** 18:14 105:18  
**electronic** 133:21  
 134:20  
**electronically** 194:22  
**element** 34:16 60:20  
 152:20 156:15 210:3  
**elementary** 208:7 209:8  
 209:15 210:1,19,20  
 210:22 211:4,8,17  
 213:19 214:3,8  
 215:14,20  
**elements** 32:18 33:17  
 34:14 37:17 51:21  
 156:20  
**eligibility** 6:4,11 32:17  
 108:18 176:21 225:9  
**eligible** 206:2  
**eliminate** 196:5  
**elimination** 186:18  
**Elizabeth** 97:2  
**Ellen** 1:17 43:6 52:6,11  
 72:2,21 76:8 77:17  
 79:15 80:4 85:12 86:3  
 88:10 95:12  
**Ellen's** 91:2  
**Ellis** 1:18 9:5,5 92:3,9  
 92:15 95:20 143:19  
 146:13 147:19 148:1  
 148:9,14,21 161:22  
 170:9,15 172:11  
 177:16 220:17 271:9  
**else's** 45:13  
**email** 221:6 259:13  
 273:15 276:6,10

**emerged** 38:6  
**Emeritus** 7:12 8:6 9:2  
**emphasis** 29:13  
**employ** 188:5  
**employability** 140:12  
**employer** 231:11  
**employers** 228:12  
 235:19 236:7  
**employment** 49:1 186:5  
**empowered** 17:5  
**encourage** 35:13 133:4  
 133:12,12 160:4,7,16  
 161:5,14 165:16  
 172:8,11 254:20  
 260:13 271:5  
**encouraged** 160:10  
**encouragement** 27:11  
 162:4 165:3,10  
**encouraging** 161:1  
 162:2  
**endangering** 168:5  
**endorses** 183:5  
**enforce** 257:19  
**enforced** 228:6 230:21  
**engage** 31:16  
**engaged** 30:4 34:19  
 50:16 141:6  
**engagement** 17:16 18:7  
 35:14 234:21 235:6  
**engages** 107:14 188:20  
**engaging** 62:16 136:13  
**Engle** 2:14 104:3,4,7,13  
 105:9,11 106:9,11,11  
 117:13,20 118:3  
 119:11 121:5 130:14  
 131:20 133:16 145:21  
 150:17  
**enjoy** 182:7  
**enjoyable** 127:17  
**enlarge** 180:2  
**enlightenment** 58:2  
**enroll** 207:9  
**enrolled** 108:4 149:9  
 152:4 154:4 236:9  
 266:4  
**enrollment** 25:21 26:5  
 32:1 40:15 41:18,19  
 44:1 49:10 51:10  
 125:11 153:9,12  
 154:10 187:19 188:2  
**enrollments** 154:21,22  
**ensure** 35:12 37:10  
 107:15 111:19 112:13  
 115:6 121:1 152:14  
 155:7 252:20  
**ensuring** 17:3,7 233:16  
**enter** 194:2  
**entering** 123:7

**entertain** 218:19  
**entertained** 234:20  
**entire** 86:20 173:20  
 174:13 189:8 201:7  
**entirely** 108:6 170:5  
**entities** 250:21  
**entity** 119:9  
**entry** 141:12  
**environment** 35:7  
 134:5  
**equivalent** 265:11  
**era** 198:5  
**error** 240:17  
**errors** 32:13  
**escalates** 126:16  
**especially** 83:21 164:3  
 221:7 236:19  
**ESQ** 1:13  
**essential** 32:18 33:16  
 34:14,15 37:17 51:21  
 60:19 127:4 143:8  
**essentially** 127:8  
 244:22 256:6  
**EST** 1:9  
**establish** 176:21 179:6  
**established** 5:10  
 111:13 174:12 188:1  
**establishing** 111:10  
**et** 118:19 257:14,18  
 264:9  
**Eubanks** 1:15 8:2,3  
 74:10 83:10 95:5  
 149:2 151:15 153:5  
 155:17 157:8 166:17  
 171:18 220:3 270:15  
**evaluate** 30:1 35:16  
 47:8 57:11 112:15  
 231:14  
**evaluated** 54:21 80:11  
 111:14 156:17  
**evaluating** 78:3  
**evaluation** 12:21 17:20  
 24:18 27:4 28:10 29:8  
 29:22 30:11,14 32:19  
 58:14 62:4,7 65:10,11  
 65:13 128:20 156:6  
 164:1 185:22 186:19  
 187:9 228:12 235:19  
**evaluations** 66:22  
 111:5,8,8  
**evaluator** 18:6 61:15,19  
**evaluators** 18:1 19:5  
 58:17 60:1,22 61:20  
 62:11,17  
**evening** 276:9,14  
**event** 100:11  
**events** 39:5  
**everybody** 96:6 139:11

218:4,11 244:4 260:4  
276:13  
**evidence** 30:20 34:15  
56:4 61:3 62:8 72:14  
102:7 113:22 163:4  
186:5  
**evidenced** 84:5  
**evolution** 252:16  
**evolved** 134:18 252:6  
**exactly** 64:2 78:21  
79:17 86:13 102:7  
216:1 240:21 273:7  
**exam** 120:7,14,15,16,18  
122:22 123:4,13  
140:2 141:7 142:18  
149:22 151:3 247:5,7  
247:11,20 249:5,15  
**example** 84:9 88:5  
122:11 125:22 133:20  
134:7 153:18 154:9  
206:11 228:18 250:20  
265:14  
**examples** 34:14  
**exams** 120:2,12,14  
121:10 122:19 248:2  
**exceed** 100:14 178:13  
**excellence** 26:12  
**excellent** 16:18 76:13  
84:20  
**exceptional** 109:14  
**excuse** 12:2 19:14  
71:16 77:5 90:2  
**executive** 2:1,8,12,14  
5:8 14:12,22 18:15  
26:10 104:3 105:10  
105:11,16,22 106:12  
110:21 181:1,15  
190:1 202:4  
**exempt** 250:21  
**exercise** 29:9  
**exhibit** 69:12 102:20  
114:13 116:2,3,9  
146:2 158:13 193:10  
194:5 197:1 246:21  
257:11  
**exhibits** 53:1 69:11  
84:6 102:17 143:21  
149:5 193:18 198:15  
**existence** 88:6  
**exists** 80:22  
**expand** 140:6 143:14  
**expanding** 184:6  
**expansion** 12:13 13:12  
71:16  
**expect** 183:4  
**expectation** 18:3 253:5  
**expectations** 131:2  
185:7,10

**expected** 61:2 156:4  
**expenses** 255:5  
**expensive** 89:10 162:3  
**experience** 16:3 17:11  
31:17 48:17 49:16,17  
50:14 51:5 105:12  
106:6 110:4 134:17  
174:2 186:2 237:8,22  
243:6  
**experienced** 18:12  
24:13 184:8  
**experiences** 31:13  
109:16  
**experiencing** 49:14  
52:5  
**expert** 174:1  
**expertise** 17:13 109:16  
163:9 243:6 253:4  
**experts** 182:18  
**explain** 43:10 259:3  
**explained** 130:15  
**explaining** 43:18  
**explanation** 32:6,8,11  
47:18 103:20 140:2  
145:1  
**explanatory** 145:4  
**explicit** 28:22  
**explore** 130:10  
**exposed** 60:22  
**express** 16:5  
**expressing** 106:13  
**extend** 246:10  
**extension** 68:12  
**extensive** 16:2 18:2  
33:22 105:12 106:6  
**extent** 120:11  
**extenuating** 32:13  
**external** 43:4 192:14  
**extraneous** 166:11  
167:20 170:2  
**extraordinarily** 109:19  
**extraordinary** 144:8  
163:12,20  
**extremely** 18:11 110:9  
204:15 246:15

---

**F**


---

**F** 184:12  
**fabulous** 190:3  
**face** 17:16,16  
**face-to-face** 152:16  
**faced** 89:14  
**facilities** 134:5  
**facing** 66:11  
**fact** 44:14 45:16 54:12  
68:17 80:18 94:10  
117:5 142:21 186:12  
230:3 237:3

**factoring** 152:19  
**factors** 179:21  
**faculty** 31:17 32:3  
56:12,19,21 57:2  
125:13 137:3 150:22  
262:16  
**fail** 125:3  
**failure** 120:19 188:9  
**fair** 135:12  
**fairer** 234:9  
**FAIRESS** 2:19  
**fairing** 49:6  
**fairly** 44:19 62:14  
120:19 123:20 132:14  
141:19 193:2  
**faith-** 48:11  
**faith-based** 24:9 48:8  
**fake** 259:13  
**fall** 25:20,22 26:7 27:21  
28:2,5 34:3 38:19  
208:4  
**fallen** 193:8  
**falls** 153:16 188:1  
**familiar** 48:9  
**family** 128:7  
**FAPhA** 2:14  
**far** 9:15 35:4 51:13,15  
84:8 119:11 162:4  
195:6 260:12 262:19  
**fashion** 29:19  
**favor** 85:4 94:16  
**favorable** 184:8  
**favorably** 189:4  
**FCCP** 2:14  
**February** 12:20 18:9  
22:9 26:6 33:10 34:21  
38:9,13,14,18 100:20  
**federal** 2:2 5:9,12 6:6  
6:13,16 21:6 41:14  
44:4 69:8 77:21  
108:15,16 133:8  
176:13,21 224:4,9,9  
224:10 264:16 265:1  
**federally** 176:12  
**feedback** 102:2 200:20  
201:2,3,5,11,11,21  
202:7,10 203:2 205:9  
**feeder** 157:1  
**feel** 38:12 43:17 163:16  
169:13 203:8 237:19  
241:7,19 246:16  
257:2  
**feeling** 78:7,8  
**feelings** 240:22  
**feels** 79:16 161:2  
**fees** 207:8  
**feet** 180:22  
**fell** 24:17

**fellow** 8:18 232:11  
**felt** 73:14 217:8  
**fewer** 22:11 57:4  
**field** 182:3,17 252:1  
**field-based** 19:22  
**fields** 254:18 271:7  
**fight** 235:4  
**figure** 86:12 102:6  
147:11 246:21,21  
251:7 256:15,15  
**figuring** 143:9  
**file** 13:1 22:20 178:21  
225:22 241:20  
**filled** 101:9  
**filing** 134:20  
**fill** 237:3  
**filled** 62:8  
**filling** 227:20  
**filter** 177:15  
**final** 13:16 40:6 84:7  
110:19 113:13,16  
114:4 141:6 144:10  
238:9 271:21  
**finally** 66:13 189:6  
**finances** 49:11 194:12  
215:8 218:9  
**financial** 22:18 24:7,13  
24:19 25:1,2,4,6,14  
25:17,22 26:3,11 32:2  
32:4 40:18 67:9  
179:21 187:17 188:2  
193:18 198:8,9  
204:19 207:21 209:10  
209:11,18 215:7  
218:5 255:3,5,7,9,18  
256:18  
**financially** 180:1  
204:16 210:9 214:21  
**find** 69:12 73:5 74:20  
74:22 75:13 79:1,6,8  
122:9 144:22 145:2  
146:15,20 147:5  
148:15,20 149:8  
156:7,9 185:9 188:16  
253:8 254:3,9 276:8  
**finding** 81:21 113:13,14  
144:17 198:19 199:9  
229:12  
**findings** 39:17 192:9  
**fine** 99:16 119:2 139:14  
227:19 250:9,17  
**finished** 64:18 138:8  
271:14  
**firm** 253:5  
**firmly** 106:21  
**first** 21:21 22:22 28:1  
31:10 32:12 36:22  
37:15 48:13 58:5

60:13 91:7 92:17  
 93:10 102:1 105:3  
 106:12 111:1 143:2  
 143:11 146:4,18  
 149:19 155:8 184:6  
 189:16 190:21 213:15  
 213:19 216:10 224:11  
 236:5 242:3 249:15  
 250:7 274:8,19  
 275:22  
**first-generation** 152:17  
**first-time** 21:15 46:3  
 47:6 142:15 143:17  
**fit** 142:1  
**five** 12:12 16:22 22:10  
 33:17 36:8 49:8 59:17  
 71:7 73:10 74:7 85:5  
 90:1 91:16,21 96:4  
 100:14 124:10,11,14  
 129:22 160:4,15  
 161:18 165:16 171:4  
 178:13 199:15 224:16  
 225:5 256:4 269:11  
**five-** 222:13  
**five-year** 142:11 185:12  
 256:6  
**five-year-old** 142:9  
**fix** 147:10 150:21  
**fixable** 150:1  
**fixed** 80:22  
**flexibility** 29:10 42:7  
 51:1 94:10,18 236:13  
 242:11 274:2  
**floor** 10:16 98:18 207:2  
**Florek** 2:3 98:1,1  
**Florida** 134:8 191:21  
**flows** 194:8  
**FNAP** 2:14  
**focus** 28:7,17,19 35:6  
 76:17 200:8  
**focused** 15:5 17:7 27:4  
 27:19 33:1 38:20  
 46:19 67:13 111:7  
 224:15  
**focuses** 33:18  
**fold** 190:4  
**folks** 200:7 201:19  
 202:12 204:13 247:8  
 251:11  
**follow** 47:19 66:3  
 126:15 137:9 189:15  
 192:6 195:6 207:15  
**follow-up** 13:6 241:17  
**followed** 10:1 34:22  
 138:16  
**following** 24:20 37:22  
 38:18 68:6 100:12  
 113:5 178:11 221:8

236:3 238:4,8  
**follows** 138:17  
**for-profit** 184:1 206:16  
**forced** 170:2  
**forget** 71:14 267:8  
**forgiveness** 197:16,17  
 197:20,21  
**form** 117:18,18 210:21  
 241:11  
**formal** 71:20 259:6  
**formalized** 202:15  
 203:12,14  
**formation** 5:14 19:22  
 61:18  
**former** 9:6  
**forth** 5:13 149:9 162:21  
 210:18  
**fortunately** 37:1  
**forums** 26:4  
**forward** 73:18 80:15  
 115:7 116:5,13,16  
 125:6 145:13 199:13  
 239:3 241:10 242:21  
**forwarded** 115:4  
**fosters** 27:10  
**found** 27:12 33:3 69:13  
 100:22 101:11 103:11  
 103:16 132:13 148:21  
 149:4 153:13 158:19  
 217:12 238:13 239:8  
 262:16 276:7  
**Foundation** 8:16  
**foundational** 29:2  
**founding** 17:1  
**four** 15:22 22:11 26:1  
 31:8 142:21 155:13  
 252:14  
**four-year** 44:9  
**fourth** 9:15 31:17  
 222:19  
**fragile** 203:22 204:11  
**fragility** 204:4  
**frame** 86:13  
**frames** 73:13  
**FRCS** 23:1,2,4,7 41:3  
**Freeman** 96:17  
**frequent** 258:8  
**frequently** 140:19  
 185:18  
**Friday** 47:12 271:18,22  
 274:15 276:4  
**friendly** 29:18 77:13,16  
 78:11 90:14 91:14  
 174:16 200:2  
**front** 65:3 66:1 103:10  
 103:12 209:1 214:20  
 249:11  
**fruitful** 124:19

**frustrating** 170:3  
**FTE** 41:12  
**fulfill** 31:9,19  
**fulfilled** 266:6  
**fulfillment** 28:16 29:6  
**fulfilment** 233:16  
**full** 49:1 62:10 109:21  
 114:22 115:7 194:3  
 203:9 205:11 224:12  
 235:3 245:13,13  
**full-time** 16:1 21:15  
 46:3 47:7  
**fully** 61:7 116:3,11  
 130:10  
**function** 186:3  
**functions** 6:10  
**fund** 197:15  
**funded** 26:13  
**funds** 41:7,7,14 99:11  
 108:14  
**Furman** 8:3  
**further** 84:11 94:9  
 117:8 124:18 134:11  
 165:12 226:5 232:7  
 234:14,19 235:16  
 238:8 239:9 251:21  
 260:3 268:13  
**future** 142:14 146:9  
 158:15 160:1

## G

**G** 190:6 191:6,17 192:6  
 192:13,21 193:6,13  
 194:1,10 195:10  
 196:1,18,21 197:4,11  
 197:18 198:1 199:6  
 202:18 203:10,14  
 204:6 205:3,19  
 206:17 207:7 208:1  
 208:21 209:6,12,21  
 211:12 212:21 214:10  
 215:3 216:1,20  
 217:19  
**G.A** 5:3 96:16 177:12  
 221:5,17 222:1,9  
 272:4 273:6,11,21  
 274:7 275:9 276:8  
**gaining** 59:13  
**Gallatin** 15:12  
**gaps** 186:16,18  
**gate** 99:10  
**gatekeeper** 20:16 21:3  
 45:3 108:13 181:22  
**gatekeeping** 195:18  
**gather** 56:7  
**gathered** 54:20  
**general** 3:11 82:13  
 85:11 212:9,19 213:1

213:2,5 223:11  
 229:16 230:8 247:17  
 257:15  
**generalization** 248:22  
**generally** 246:3 247:18  
 247:22 248:21,22  
**generation** 48:14  
**gentlemen** 16:2  
**geographic** 191:8  
**George** 2:1 5:8 7:3  
 96:14,20 221:4,12  
 276:2,6  
**getting** 53:20 86:9  
 92:18 180:22 217:5  
 248:8  
**give** 58:2 101:21 131:21  
 136:16,22 151:13  
 153:18 167:14 170:6  
 221:22 244:7 247:14  
 251:3  
**given** 44:14 55:11  
 56:10 66:11 67:1  
 69:20 72:6 78:1 94:15  
 140:11 156:21 163:20  
 182:17  
**gives** 47:1 94:17  
**glad** 48:2 130:14  
 250:15 266:14  
**Glen** 2:20 181:15  
**Glenn** 181:2  
**goal** 84:12  
**goals** 28:14 29:21  
 63:15 87:13  
**Google** 147:3,9  
**Googled** 144:22  
**gosh** 73:16 244:1  
**governance** 26:13  
 115:2  
**governed** 5:12  
**Governing** 8:19  
**government** 41:14  
 109:6 234:18 235:7  
**Governor** 9:6  
**GPA** 155:6,9  
**GPA's** 141:11  
**grace** 197:15  
**gradation** 262:14  
**gradations** 262:21  
**grade** 135:4,16  
**grades** 84:3,10,10  
**graduate** 6:16 10:22  
 14:2 20:17 22:6 56:22  
 108:5 132:16 162:3  
 168:14 248:1  
**graduates** 131:17  
 140:12 143:1,6 247:4  
 247:6  
**graduating** 254:6

**graduation** 21:15,16  
22:2,10,13,16 32:2  
44:6,13 45:17 47:8,16  
63:6 84:4 121:14  
237:8  
**graduation/transfer**  
45:20,21 46:22  
**Grand** 137:15,20  
**grant** 26:14 108:21  
109:4 219:3  
**granted** 23:12,13  
111:21 183:14 197:12  
197:19,20  
**grantee** 175:17  
**granting** 176:18 181:19  
187:14 188:14 196:13  
**grants** 107:8 109:6,8  
255:8 256:19  
**graphic** 46:16  
**gratified** 36:6  
**gray** 150:5 244:2  
**greater** 148:11 182:5  
236:12  
**greatly** 42:22 252:9  
253:10  
**Greg** 105:21 110:17,21  
121:7 123:2 130:18  
130:22 142:2,9  
153:15 154:6  
**GREGORY** 2:12  
**grey** 94:19  
**ground** 38:20  
**group** 2:2 8:13 97:1,8  
97:11,15,18,21 98:2  
106:15 109:14 119:14  
127:19 155:5 200:17  
201:6 203:8 210:2  
211:10 213:6 244:14  
275:6  
**groups** 200:8 263:22  
**Guam** 176:9  
**guess** 43:21,22 63:3  
64:16 73:4 75:16 76:7  
91:13 97:5 101:20  
170:7,11 220:19  
236:7 240:20 243:14  
256:19  
**guessing** 254:19  
**guidance** 27:8 29:15  
61:21 106:19 116:15  
233:13  
**guide** 126:1

---

**H**


---

**H** 71:14 74:19 78:14  
96:21 97:9,12,16,19  
97:22 98:3,8 218:3  
230:22

**half** 66:2 254:1  
**half-day** 276:4,4  
**HALL** 1:16  
**Hall-** 10:14  
**Hall-Martin** 7:16,17  
10:18 36:22 40:8  
71:10 72:1 95:9  
166:21 171:22 220:7  
269:20 270:19  
**hampered** 194:7  
**hand** 52:7 71:13 72:3  
78:18 83:2 121:22  
162:12 212:1,2,5  
**handbook** 262:15  
**handful** 241:7  
**handle** 101:19 123:3  
132:17  
**handled** 194:12 213:15  
214:8  
**hands** 78:12 218:15  
267:16  
**happen** 70:10 159:22  
255:18 258:8 260:19  
**happened** 39:19 49:7  
65:8 80:16 122:15  
146:10,15 163:2,20  
191:6 193:5,19  
215:20  
**happening** 55:9 167:8  
**happens** 91:7 227:15  
260:21 266:20  
**happy** 14:8 36:16  
127:14 138:3 190:19  
219:1 226:14 232:22  
239:10  
**hard** 96:3 109:20  
**harder** 274:3  
**harm** 84:14  
**Harris** 2:4 10:16 11:21  
12:1,4 14:11,11 16:7  
70:18,19 85:22 98:5,6  
**Harris'** 16:12  
**harsh** 80:17 267:11  
**harsher** 66:11  
**hat** 240:5  
**hats** 240:8  
**hazard** 119:22 120:20  
**HBCUs** 20:10  
**HEA** 5:17 6:8,14  
**head** 20:5 193:7 213:10  
249:17,22 264:22  
**headlines** 37:8  
**health** 5:17 107:20  
108:19,22 109:2,3  
127:22 224:5  
**healthcare** 236:19  
**hear** 11:21 43:1 48:3  
76:8 85:22 124:16

138:4 140:13 157:18  
157:20 158:4 213:19  
213:19 276:10  
**heard** 85:12 139:22  
147:2 204:6  
**hearing** 79:15 142:22  
**hearings** 112:19  
**heavily** 24:10 28:8  
**heavy** 119:14  
**HEERF** 41:6,15  
**heightened** 22:8 141:4  
**held** 182:2 242:16  
**Hello** 97:13 181:9  
213:12  
**help** 42:17 66:18 105:7  
121:1 126:20 146:20  
155:16 177:11 180:2  
**helpful** 67:5 119:17  
124:22 130:18 141:8  
246:15 249:9 263:17  
264:10 268:9  
**helping** 25:13 124:22  
**helps** 88:18 130:19  
152:3 203:11  
**Helton** 2:4 97:10,10  
99:17,19 102:16,19  
103:13 106:17 157:20  
157:22 158:4,7 159:5  
**Herman** 2:2 71:12  
74:16,18 76:9 78:12  
78:22 81:19 83:11  
96:19,22 98:9 106:14  
189:8 218:1 228:9  
229:10 230:19  
**Herman's** 228:10  
**hesitating** 268:18  
**Hester** 2:9 15:8,13  
**hey** 61:5,21  
**HHS** 109:5 224:6  
**hi** 48:6 78:19 85:10  
**high** 21:12 24:12 29:13  
44:8 110:14 120:19  
168:15 193:2 246:22  
250:6 255:13  
**high-earning** 164:6  
**higher** 2:7 4:5 5:10 6:12  
9:10 10:12,20 12:6  
13:22 14:20 17:3 29:1  
35:7 36:12 40:14  
48:15 49:3,13 71:6  
122:7 155:22 176:12  
208:6,12 215:11  
252:4  
**highlight** 129:14  
**highlights** 192:18  
**Hillsborough** 137:22  
**Hilton** 98:18  
**historical** 228:5 229:11

230:20  
**historically** 144:13  
190:10  
**history** 17:2 66:11  
137:17 145:5,7,17  
147:5,15 148:8  
162:16,18 163:13  
231:12 244:18,20  
**hit** 40:17 48:22 124:12  
126:2,10,13 267:19  
**hits** 123:18 124:4  
**hitting** 150:9,9  
**hold** 42:1 56:21  
**holding** 112:2,6  
**Hon** 2:14  
**honest** 214:18  
**honor** 29:8  
**hope** 80:3 88:18 159:2  
189:3 198:13 236:20  
271:17 272:13 276:5  
**hopefully** 62:14 273:3  
**hoping** 57:6 210:13  
**host** 27:8 60:14  
**hosted** 18:6 38:19  
**hosting** 28:10  
**hours** 129:9 274:14  
**HR** 128:14  
**huge** 120:9 121:2 164:9  
198:7  
**Human** 108:22  
**hygiene** 223:15 248:3  
248:17 263:21 264:7  
**hygienists** 263:22  
264:7  
**Hypothetically** 151:16

---

**I**


---

**idea** 59:14 118:11 261:1  
**ideas** 124:16  
**identification** 187:4  
**identified** 24:5,18 26:21  
30:18 60:3,4 61:16  
62:9 117:6 159:15  
184:19 187:9 225:6  
228:2 264:6  
**identifies** 225:16  
**identify** 125:10 134:2,4  
151:2 186:16 187:12  
187:21 188:6 238:6  
**identifying** 32:13 62:5  
102:11  
**imagine** 128:18 259:1  
273:19  
**immediately** 55:22  
201:3,5 217:14  
**impact** 41:15 73:20  
140:12 143:10 182:2  
200:11



**impactful** 263:7  
**implement** 68:9 88:1  
**implementation** 25:3  
 55:9  
**implemented** 56:3,9  
 64:4 113:11 242:18  
**implementing** 28:1  
 233:18  
**implicit** 28:22  
**important** 37:19 82:3  
 105:5 122:20 130:22  
 143:7 152:20 199:10  
 213:13 214:16 256:2  
 257:2  
**importantly** 233:20  
 254:16  
**impressive** 246:22  
**improve** 41:4 51:20  
 62:19 150:13 187:5  
 199:12  
**improved** 22:22 23:2,6  
 31:10 182:5  
**improvement** 17:14  
 24:6 25:18 27:16 34:2  
 56:4,6 76:22 80:19  
 81:4 129:7 150:2  
 182:17 186:10,15,22  
 187:6 188:7,9,21  
 233:21 243:21  
**improvements** 22:13  
 36:2 64:9  
**improving** 34:10  
 141:17  
**inclination** 117:4  
 159:13  
**inclined** 76:10 239:19  
**include** 18:17,21 20:8  
 22:7 25:19 34:4 71:16  
 83:7 87:15,16 160:7  
 202:2,10 223:9  
 225:14 255:7 263:22  
**included** 64:11 107:13  
 112:20 115:22 194:4  
 200:11,12,12 208:5  
 225:21 230:8 238:15  
**includes** 27:22 71:15  
 108:5 272:1  
**including** 14:3 20:9  
 24:22 32:1 34:2 45:5  
 55:19 105:13 107:11  
 109:12 176:8 209:22  
 223:14 229:17 230:4  
 234:17,21  
**inclusion** 12:13 13:13  
**income** 143:4  
**incomplete** 258:13  
**incorrect** 217:13  
**increase** 18:7

**increases** 234:18  
**increasingly** 62:18  
**incurring** 121:21  
**independent** 7:21  
 99:12 176:15 187:19  
 224:8  
**Indiana** 48:8  
**indicate** 35:4 44:16  
 158:14 188:3 193:18  
**indicated** 39:9 68:11,16  
 195:4 230:15 241:6  
 252:11  
**indicates** 21:4 22:21  
 46:2 168:2 197:1  
 236:6  
**indicating** 68:8 89:1  
**indication** 80:20 120:6  
 131:16  
**indications** 132:15  
**indicative** 164:7  
**indicator** 32:5  
**indicators** 31:22 32:4  
 44:11 45:19 47:17  
 76:17 184:19  
**individual** 152:3 211:13  
 213:16 237:12,19  
 238:2,11 259:7  
**individuals** 24:11 26:2  
 61:17 109:12 217:4,7  
 231:1 236:9 237:3,6  
 238:18 242:13,14  
 243:4 247:18 248:7  
 252:22 259:12  
**industry** 197:10  
**ineffective** 81:22  
**inform** 238:20 259:20  
**information** 12:5 19:12  
 30:9 36:15 38:21  
 39:13 59:4 60:11 61:1  
 63:19 64:7 66:5 73:14  
 73:17 81:21 110:17  
 111:12,18 115:20,21  
 116:3 120:10 133:6  
 136:19 146:20 148:6  
 148:20 159:1,17  
 163:11 168:7 191:9  
 191:18 217:14,18  
 232:20 242:20 245:21  
 246:1 254:5,14  
 256:12 259:21  
**Informed** 28:13  
**informing** 262:19  
**inherent** 16:11  
**initial** 23:14 59:17  
 114:2,20 130:4 217:1  
 223:18 231:22 234:1  
 238:4 243:13 244:20  
**initially** 216:22

**initiated** 40:3  
**initiatives** 111:16,19  
**innovation** 35:9  
**input** 105:7 112:18  
 131:4 179:4 252:21  
**inquire** 259:22  
**insist** 83:16  
**inspiring** 155:19  
**instability** 188:3  
**instance** 158:16 163:7  
**instances** 241:5  
**institutes** 51:3  
**institution** 18:17 19:9  
 21:9 22:7,8 23:17,20  
 23:21,22 27:11 29:16  
 31:9,18 32:6,21 37:6  
 38:4,8,10,13,19 39:1  
 39:6,10,15 40:2,4  
 46:13 48:9 53:8,9,22  
 54:4,11,15 55:3,4,17  
 56:11 57:3 58:9,10,19  
 59:13,15,16 61:11  
 62:12,21 63:16 64:9  
 65:10,16,18 66:4,19  
 67:22 68:1,3,6,8  
 69:13 70:11 72:17  
 75:9 105:15 134:8,12  
 144:8 162:20 163:14  
 183:2,9 186:4 187:3  
 187:18,21 188:10  
 192:16 204:5 253:14  
 255:10 261:8 262:20  
 265:3 267:1  
**institution's** 24:16 63:4  
 66:7 147:4 183:7  
**institution-wide** 183:15  
**institutional** 1:4 5:6 7:6  
 11:2 12:8 15:6,10  
 17:14 18:13,19 19:14  
 19:19 25:5,18 26:8  
 28:3 29:21 30:1,5,22  
 31:4,5 33:19 34:1,13  
 36:4 37:10,18 53:4  
 56:2,5 59:4 63:14,19  
 99:9 108:10 184:21  
 187:17 206:4 268:3,6  
**instruction** 11:1 125:12  
 245:22  
**instructional** 35:8  
 50:19  
**integrated** 53:18  
**integrity** 1:4 5:6 7:7  
 17:3 37:11,18 257:11  
**intend** 46:11 176:20  
**intended** 55:13 63:8  
 188:22  
**intending** 46:7  
**intent** 236:2 237:17

245:9 246:6 261:18  
 263:8 265:10 267:10  
 267:10  
**intention** 63:11 67:10  
 113:6 158:14  
**interest** 19:6 51:5 69:5  
 127:3,16,19 129:9,12  
 130:11,17 131:7  
 153:3 168:2 234:6,13  
**interested** 89:20 222:11  
 228:10 229:8 266:17  
**interesting** 65:1 117:12  
 127:5 131:9 205:21  
**interim** 111:15  
**interject** 272:5  
**intermediate** 251:3,5  
**internally** 146:8  
**international** 48:13,19  
 49:15 107:19  
**interpret** 261:1  
**interpretation** 231:1  
 239:6 242:17 244:5  
 268:21  
**interpreted** 230:20  
**interrupt** 196:11  
**interview** 50:1  
**interviews** 234:21  
**intricate** 126:19  
**intrigued** 69:5  
**intro** 223:5  
**introduce** 7:8,9 9:18  
 11:16 14:12,14 96:15  
 97:1,4 104:3,5 105:8  
 180:11,13 207:18  
 232:10  
**introducing** 96:12  
**introduction** 19:11 41:1  
 58:21  
**Introductions** 4:2  
**introductory** 239:13  
**invaluable** 16:15 32:12  
 109:16 188:18  
**invest** 197:2,6  
**investment** 35:11 197:6  
 214:21  
**investments** 194:6  
 197:1  
**invitation** 124:20  
**invited** 9:22  
**involuntary** 261:10  
**involved** 48:12 60:20  
 61:14,17 154:17  
 159:16  
**irate** 135:13  
**IRS** 250:21 251:1  
**Islands** 176:8 191:15  
 195:13  
**issue** 49:15 72:6 82:20

88:8 116:11 117:6,10  
 123:1 141:1,17  
 144:16 146:4 147:1  
 151:4 166:2 168:11  
 199:1 215:7 218:5,12  
 225:7 226:20 242:15  
 250:16 266:17 267:5  
 274:17  
**issued** 23:19 100:15  
 178:15  
**issues** 13:10 25:13,17  
 27:3,7 30:21 32:22  
 37:20 38:5,11 49:13  
 51:18 65:20 80:10  
 103:17 111:16 119:19  
 121:20 126:21 129:3  
 129:14 130:10 179:1  
 186:7 187:8 242:2  
**item** 82:1 102:3 117:5  
 145:20  
**items** 39:11 43:16  
 127:9 133:18 255:1  
 272:7  
**IV** 6:14 12:8 20:15 21:3  
 21:7 45:2,5,8,12  
 99:10 108:13 176:21  
 181:22 183:21 184:4  
 188:14 190:4,5  
 195:18 206:2 216:6  
 223:7 224:4,10 268:4  
**IVA** 255:12  
**IX** 34:6

---

**J**

---

**J** 2:12 8:18 9:9 67:20  
 68:19 69:3 70:8,15  
 77:11,19 87:8 93:16  
 94:8 104:7,13 106:11  
 118:3 119:11 121:5  
 130:14 131:20 133:16  
 138:13 139:14 145:21  
 150:17 157:17 159:8  
 160:20 161:1 166:8  
 166:15 167:2 168:19  
 170:22 171:10,16  
 181:9 189:22 198:2  
 198:12 213:12 219:9  
 219:17 220:1 222:5  
 223:5 226:18 227:13  
 228:9 231:17 232:5  
 239:18 241:17 243:7  
 246:15 249:9 250:5  
 260:9 263:19 264:10  
 264:12 266:10 268:9  
 268:18 269:3,9 270:7  
 270:13 274:12 275:3  
**J.G** 110:20 123:5  
 126:12 127:14 134:19

140:17 142:13 145:5  
 147:15,20 148:2,10  
 150:6 152:2 154:8  
 156:14  
**Jackson** 2:9 15:19,21  
**James** 2:20 181:10  
**Jan** 106:11 130:12  
**Janet** 2:14 104:3 105:9  
 106:9  
**January** 113:4,6 115:14  
 225:22 226:2  
**Jennifer** 1:13 9:8,9 43:6  
 67:19 70:16 72:20  
 76:8 85:9 87:7 93:3  
 93:15 94:1,9 160:22  
 165:4 166:7 168:17  
 170:5 171:9 219:16  
 223:2,4 239:15,16  
 250:15 260:19 264:11  
 268:17 270:6  
**Jennifer's** 164:1  
**jeopardizing** 167:19  
**Jersey** 9:7 176:6  
**Jill** 1:15 8:17,18 94:7  
 98:15,18 116:21  
 138:10,12 139:13  
 157:16 159:6,11  
 160:21 166:14 170:21  
 171:15 219:22 260:4  
 263:18 270:12 274:22  
**Jim** 181:5 213:12  
**Joan** 155:13  
**job** 43:18 50:7 76:13  
 120:1 168:22 185:2  
 185:22 186:2  
**join** 22:3 221:19 233:9  
**joined** 16:1 105:9,21  
 106:3 180:21  
**joining** 15:15 167:13  
**joint** 213:14,17 214:5,5  
 214:9  
**journey** 27:21  
**joy** 138:14  
**judgment** 55:16  
**July** 1:6 68:6 113:4,11  
 114:5 180:21  
**jump** 228:3 244:1  
**jumps** 228:9  
**June** 39:21 40:2 67:13  
 197:2 224:13  
**jurisprudence** 120:15  
 120:18

---

**K**

---

**K** 97:13 177:4,8,19  
 218:17  
**K.S** 92:21 93:11 165:19  
 166:2 171:6 175:11

179:20 180:6 189:16  
 190:20 191:12 192:1  
 192:10,17 193:4,10  
 193:15 194:4 195:4  
 195:20 196:15,19,22  
 197:8,14,22 198:11  
 198:13 206:22 207:3  
 218:21 219:13 270:3  
 276:6,12  
**Karimi** 2:15 104:9,12,15  
 104:16,21 110:10  
 137:12,21 138:3  
**Karmon** 2:6 97:12,13  
 175:9 177:13 178:1  
 189:7 202:10  
**Kathleen** 1:12 92:2,19  
 92:20 93:8 165:18  
 171:5 175:7,10  
 179:18 180:5 189:13  
 189:15 190:7 196:11  
 198:18 218:19 219:12  
 270:2  
**Kathryn** 232:16  
**keep** 95:1,14 133:2  
 136:11,13 148:7  
 165:8,10  
**keeper** 99:10  
**kerfuffle** 173:15  
**Kevin** 2:9 15:8 42:18  
**key** 136:19 156:15  
**kick** 75:2  
**kinds** 83:19 128:11  
 141:12 145:18 156:8  
 157:5  
**knew** 137:13  
**knot** 179:22  
**knowing** 57:17 251:12  
**knowledge** 16:12 17:13  
 29:3 230:20 237:10  
 237:22  
**known** 5:6 84:22 113:9  
 225:1 233:5  
**Kraft** 2:20 181:5,7,9,10  
 189:22 190:6 198:2  
 198:12 213:12,13  
 214:11  
**Kroll** 16:18

---

**L**

---

**L** 1:13 14:16 37:12  
 40:21 44:17 45:16  
 47:19 49:12 58:4  
 63:12 64:21 66:16  
 68:4 69:2,17 70:11  
 97:20  
**labeled** 228:1 240:17  
**Labor** 132:9  
**laboratory** 223:16

248:20  
**lack** 185:19 186:3  
**Lagaard** 96:19 167:11  
**language** 7:15 58:6  
 59:11,19,19 72:7  
 82:12 94:11,17 242:9  
 262:3  
**languish** 150:20  
**laptop** 177:16,17,18  
**large** 47:9,9 157:2  
 215:14 247:13  
**largely** 216:15  
**larger** 206:5  
**lastly** 101:13 137:11  
**late** 37:8 64:1 172:19  
 266:20  
**latest** 193:22 254:6  
 276:10  
**launched** 34:21 112:10  
**law** 69:9 120:15 161:13  
 252:2  
**laws** 225:7  
**lawyers** 128:16  
**lax** 149:14  
**lay** 28:19  
**layers** 243:19  
**layperson** 131:13  
**lead** 107:10 128:3 242:4  
**leader** 18:21  
**leaders** 18:18 25:21,21  
 26:9 34:6 70:22 175:7  
**leadership** 16:3 25:19  
 34:2 252:4  
**leading** 21:14 56:4 99:1  
 223:10 245:15 247:16  
**leads** 125:4 136:3 153:7  
 258:19  
**lean** 269:7  
**learn** 50:18 258:8  
**learned** 64:19 72:9  
 74:12  
**learners** 21:14,22  
**learning** 18:19 31:11,13  
 31:17 50:12,14,17  
 53:15 54:16 55:20  
 56:5 57:16 63:7 74:1  
 74:13 80:11 83:12  
 84:11 87:17 89:12  
 237:7  
**leave** 221:11  
**led** 38:7 259:3  
**left** 136:19 271:12  
**legal** 75:16 213:9  
 232:17  
**legitimate** 135:15  
**length** 22:1 110:13  
**let's** 139:11 140:7 180:8  
 205:12 211:7 272:13

**letter** 6:19,20 39:8,17  
54:15 55:6,14 56:12  
56:20 68:7,7,16  
225:13  
**letters** 24:6 38:15  
245:19 258:16  
**level** 48:2 110:14  
149:12 185:1 203:21  
203:22 204:12,14  
211:14 264:21 265:1  
**levels** 131:17 133:11,14  
**leverage** 50:18  
**LG** 2:3 97:19,20  
**liability** 215:15,16  
**license** 237:1  
**licensed** 110:2 132:17  
140:16 175:21 247:21  
248:2,4,5,7,17 249:1  
**licensee** 149:22  
**licensing** 123:7 185:1  
205:16 248:2  
**licensure** 140:2 143:7  
246:20 247:1,6,9  
248:5 249:10,14,14  
249:18  
**lied** 66:9  
**lies** 257:10  
**life** 28:20 51:6  
**light** 35:22 52:4 81:13  
141:1  
**liked** 154:8  
**limited** 151:21 161:7,13  
194:6  
**Lindsay** 1:16 48:6,7  
49:18 95:7 166:19  
171:20 220:5 270:17  
**line** 56:18 73:1 113:8  
129:17 192:2 205:18  
205:20 257:17 264:14  
**lined** 139:17  
**lines** 206:12  
**link** 102:13 108:15  
128:6,7 159:17  
176:12 224:9,9  
**linked** 28:16  
**Lisa** 2:8 14:12,21  
**list** 103:3,14,18 140:19  
140:21 148:19 152:9  
236:8  
**listed** 6:7 57:4 70:4  
93:7 103:10 108:18  
114:20 272:7  
**listen** 73:12  
**listening** 34:21 35:1  
73:12 76:9  
**listing** 145:6,17 147:16  
147:20  
**lists** 5:19

**literally** 55:12 199:15  
**little** 19:15 52:15 60:1  
61:19,21 88:18 102:3  
102:6 120:22 123:2  
130:5 140:22 143:9  
145:15 150:8 154:12  
154:19 155:6 169:19  
172:20 190:15 194:11  
204:10 208:2 214:19  
216:8,14,17 229:22  
230:17 231:3 240:13  
243:22  
**lives** 128:10  
**lo** 128:4  
**lo'** 154:1  
**load** 132:17  
**loan** 140:13 160:5,17  
165:17 168:4 187:16  
192:2 197:16,17,19  
197:19,22 253:14,18  
254:16 271:6  
**loans** 21:6 108:20,20  
119:21,22 253:15  
255:7 256:19  
**local** 137:18  
**located** 11:4 108:8  
**location** 17:19 68:15  
**locations** 184:15  
191:10  
**lock** 194:22  
**Lodge** 137:15,20  
**log** 136:11  
**long** 17:2 67:11 110:13  
129:21 190:17 197:11  
218:8 251:10 262:10  
271:16 272:18  
**long-** 252:17  
**longer** 48:21 68:18  
73:19 172:20 194:14  
194:18 205:9 208:9  
208:14 262:2  
**look** 44:7 47:16 51:19  
54:3 61:5 70:8 82:21  
82:22 86:11 94:13  
103:9 116:16 119:3  
121:8,10,12,14,16,17  
121:17 122:4,18  
131:8,20 133:1,13  
137:10 142:14,14  
145:15 148:18 157:1  
162:15 164:3 189:3  
192:13,15 199:16  
200:3,4,14,19 203:5  
206:8 211:12 212:17  
218:8,8 243:18  
249:13 254:3 258:10  
261:4  
**looked** 57:15 72:3

102:8,9 103:9 120:17  
229:1 231:8,20  
**looking** 16:10 41:5  
43:15 53:1,7 65:2  
67:5 81:8 86:13 88:19  
102:17 103:1,6,20  
127:20 129:2 132:12  
142:1,16 143:16,19  
144:2 146:14 154:3  
156:20 164:11,20,21  
165:4 175:5 192:11  
206:2,6 210:12 230:7  
240:6 254:7,8 255:15  
**looks** 80:7 129:17  
157:19  
**LORNA** 2:19  
**lose** 226:20  
**losing** 207:5 212:14  
**loss** 215:2  
**lost** 45:10 237:20  
261:13  
**lot** 52:10 83:22 84:1  
89:9 119:21,21 127:9  
149:18 151:18 168:12  
191:19 194:21 198:5  
200:13 205:19 207:13  
215:9 216:7,11,17  
217:15 246:16 251:16  
253:3 255:15 256:11  
257:4 273:5  
**lots** 132:20 149:5  
152:18  
**loud** 74:2 158:2  
**louder** 52:19  
**love** 127:15 169:6  
**low** 43:20 132:14 140:3  
157:21 186:2 255:11  
**lower** 140:9,11 141:11  
149:18,21 150:7  
151:17 155:6 191:11  
207:14  
**lowered** 153:20  
**lowering** 154:22  
**lunch** 172:21 173:2

---

**M**

---

**M** 7:16 10:18 36:22 40:8  
48:6 52:8,14,18 71:10  
72:1 95:7,9 97:17  
166:19,21 171:20,22  
220:5,7 224:18 227:6  
227:17 229:10 232:4  
267:22 268:13 269:20  
270:17,19  
**M.E** 63:1,11 64:16 66:8  
67:18 72:4 80:7 81:15  
95:13 164:18 172:4  
220:11 260:5 262:10

263:16 269:14,19  
271:1 273:8  
**Macoli** 194:14  
**mail** 194:7 259:14  
**main** 101:20  
**maintain** 154:21  
**maintaining** 188:17  
**major** 128:15 139:7  
168:11 182:2 198:2  
**majority** 117:15,19  
135:3  
**maker** 90:14 91:11  
**makers** 19:4 82:15  
89:17  
**making** 19:8 66:5 79:19  
118:14 125:17 129:1  
130:7 131:2 161:19  
162:8 173:20 217:19  
236:4 241:8  
**Malia** 232:18  
**Mallory** 97:2 100:3  
106:17  
**Mallya** 3:13 232:15  
233:3,4 241:1,6  
**manage** 24:14 134:21  
135:19 253:8  
**Management** 6:19  
**manages** 31:18  
**Mangold** 2:5 96:18  
**manipulative** 169:19  
**March** 13:1 55:6  
**marginal** 61:4  
**mark** 205:2  
**marked** 237:20 238:5  
**Martin** 1:16 10:15  
**Mary** 1:17 43:5 52:6,11  
72:2,21 76:8 77:17  
79:15 80:4 85:12 86:3  
88:10 91:2 95:12  
**Mary-Ellen** 164:17  
172:3 220:10 264:13  
269:15 270:22  
**Maryland** 176:5  
**master's** 14:2 56:21  
**material** 237:18  
**materials** 53:5 78:1  
106:18 144:1 146:1  
185:14  
**math** 41:10  
**MATHX** 140:20 141:5  
141:17 142:18 143:1  
143:11 151:3 153:21  
155:14  
**matriculated** 266:7  
**matter** 96:8 173:8  
222:15 227:2 231:8  
239:5 241:18 242:1  
272:20 276:16

- maximum** 140:8  
**Mayes** 1:17 8:12,12  
 10:15 36:20 40:10  
 42:20 71:2,21 77:14  
 77:17 90:22 92:16  
 95:11 96:7 172:2  
 220:9 270:21  
**McKISSIC** 2:5 97:6,7  
**mean** 54:8 55:3 57:13  
 58:10 75:21 117:20  
 123:12 131:20 140:1  
 194:9 215:21 259:11  
 266:20  
**meaning** 253:15 271:17  
**meaningful** 29:18 35:14  
 47:22  
**meaningless** 89:13  
**means** 29:7 124:12  
 183:6 267:7  
**meant** 255:9  
**measure** 84:11  
**measured** 51:11  
**measurement** 81:11  
**measurements** 79:21  
**measures** 42:10 87:16  
 154:5 161:9  
**mechanical** 266:9  
**mechanics** 151:6 234:9  
**mechanisms** 234:20  
**media** 37:14 39:7,14,16  
**median** 43:20  
**meet** 31:13 99:11 122:5  
 124:15 140:19 142:12  
 145:3 163:3 176:14  
 224:7 227:18 267:16  
**meeting** 5:4 7:5 18:9  
 26:6,8 27:18 30:17  
 32:8 34:3,22 38:19  
 39:21 40:1 67:13  
 72:11 100:19 114:5  
 114:19 115:14 118:6  
 128:21 129:10,18  
 136:4 146:18 163:2  
 163:17 165:1 173:12  
 178:20 202:5 221:9  
 224:14 225:22 226:2  
 267:18 271:18 272:22  
 273:9  
**meetings** 12:20 18:10  
 66:3 129:9,19  
**meets** 13:8  
**member** 7:17 18:22  
 65:8,13 77:13 109:13  
 117:14,18 118:13,22  
 118:22 119:8,10,12  
 119:13,16 127:8  
 137:3 188:15 189:10  
 199:2 202:16 205:10  
 207:4 235:1 251:22  
 252:16 261:11  
**members** 1:11 7:9 12:3  
 14:14,17 15:15 18:13  
 18:15,17,21 54:2,2,9  
 57:11 58:14 96:18  
 99:18 104:17 106:14  
 110:8 118:20 128:13  
 129:20 177:21 180:17  
 202:2 203:1,4 205:7  
 220:21 221:16 224:19  
 232:11 233:14 235:3  
 251:16,17 252:6,7,10  
 252:12,14,15 253:4,6  
 253:8 260:13 271:13  
**membership** 196:8  
 200:10 203:9 204:18  
**memo** 129:11  
**mention** 67:10  
**mentioned** 34:4 41:1  
 44:10 50:6 58:21 59:1  
 67:7 69:21 75:1 81:19  
 92:10 110:10 119:14  
 144:3,21 147:2,16  
 153:7 155:13 198:20  
 204:21,21 243:9  
 248:17  
**mentioning** 64:3  
**merit** 32:11 259:18  
**messy** 240:13  
**met** 1:8 63:9,9 183:10  
 199:16 200:21 236:2  
**methods** 123:6  
**metric** 45:21 161:15  
**Michael** 1:16 2:6,9  
 15:19 43:5 48:5,7  
 95:6 166:18 171:19  
 220:4 270:16  
**microphone** 52:12  
 157:19 260:8  
**middle** 2:18 4:13  
 170:10 173:4 175:5  
 175:11,13 178:3  
 180:19 181:5,11  
 188:17 189:10 190:22  
 198:3 204:13 207:17  
 207:19 208:5,11,18  
 208:22 211:15 214:3  
 214:17 219:3 220:21  
**midst** 80:1  
**Midwest** 191:2  
**Mike** 97:16,17 223:4  
 224:17,19 232:2  
 233:11 267:15 268:11  
**miles** 137:22  
**million** 21:8,9 109:9  
**mind** 91:4 153:11  
 199:18 265:8 272:4  
**mindset** 143:5  
**minimal** 61:3 251:18  
**minimalist** 257:5  
**minimally** 54:7 57:12  
**minimum** 230:9  
**Ministers** 128:16  
**ministry** 18:22 19:22  
 21:20 28:18,19 29:3  
 46:20  
**ministry-oriented**  
 42:13  
**minority-serving** 20:9  
**minute** 96:5 222:14  
**minutes** 67:11 199:10  
**missed** 51:14 145:4  
 147:14  
**missing** 62:9  
**mission** 28:14,16 29:1  
 29:4,7,9,11,14 30:2  
 31:4,7,19 42:14,21  
 43:20 106:22 110:9  
 152:2,19 188:18  
 233:16  
**missions** 31:5  
**mistake** 57:5  
**mix** 152:6  
**mixed** 120:10  
**modalities** 35:8 50:19  
 176:11  
**model** 131:8 186:22  
 205:5,6,13  
**moderate** 61:4 140:20  
**moderately** 54:5,7,12  
 54:22 57:12  
**modest** 24:14  
**modified** 171:2 265:19  
**modify** 77:5  
**Molly** 1:16 7:14,16  
 10:14,16 36:18,20  
 70:22 71:12,22 74:18  
 77:16 92:16 95:8  
 166:20 171:21 220:6  
 270:18  
**Molly's** 67:22  
**moment** 58:15 59:22  
 69:8 144:7 149:3  
 222:10  
**money** 84:1 197:6  
 211:10 212:15 256:22  
**Monica** 96:17 167:1,9  
**monitor** 33:8 69:22  
 123:8 131:16 132:2  
 160:4,8,11,13,16  
 162:2 165:16 168:13  
 172:9,12 266:3 271:6  
**monitoring** 22:8 24:17  
 73:9 76:10 77:2 78:4  
 78:16 79:4,9 82:6,11  
 82:18 83:7 84:19 85:6  
 85:17 89:1,7,20 91:16  
 93:18 121:9,12 122:5  
 123:18,20 124:4,13  
 131:15 165:21 168:3  
 186:7 187:1 188:8  
 225:12,14 226:11,21  
 228:19,22 229:2  
 234:15 241:20 251:11  
 257:3,19 266:8  
 269:10  
**monitors** 22:18 31:21  
 187:15  
**month** 137:14 202:5  
**months** 55:11 56:11  
 100:9 178:10 200:21  
 219:6 225:12 226:12  
 246:9 263:9  
**morning** 5:3 7:4 8:2,12  
 10:18 12:2 14:17  
 96:21 97:6,17 99:17  
 104:7 221:13 222:3  
 271:21,22 272:2,14  
 274:1,5,8,15,22  
 275:20 276:2,11,15  
**Mort** 2:20 181:2,15  
 190:1,6 191:6,17  
 192:6,13,21 193:6,13  
 194:1,10 195:10  
 196:1,18,21 197:4,11  
 197:18 198:1 199:6  
 202:18 203:10,14  
 204:6 205:3,19  
 206:17 207:7 208:1  
 208:21 209:6,12,21  
 211:12 212:21 214:10  
 215:3 216:1,20  
 217:19  
**motion** 71:1,3,9 77:5,6  
 77:13 78:11 82:15  
 83:6 89:1,4,18,21  
 90:3,4,5,12,21 91:1,5  
 91:20 92:7 93:2,7  
 96:1 159:12 160:2,6  
 160:19,20 161:5,20  
 164:2,16 165:11,14  
 168:6 171:1,2 172:17  
 173:16,17 174:4,4,17  
 174:18,19 213:18  
 218:20,22 219:9  
 220:20 268:17 269:13  
 269:22 270:1 271:12  
**motions** 58:6,7 239:21  
**motto** 155:22  
**move** 71:4 78:20 80:15  
 96:19 113:12 174:10  
 219:2 239:3 243:7  
 268:16 274:4,5

275:20  
**moved** 174:21  
**movements** 79:20  
**moving** 73:18 141:8  
 199:13 241:10 242:20  
**MSA** 184:22  
**MSA-** 184:17  
**MSA-CSS** 2:18 4:14  
 175:6,12 180:12  
 183:19 184:17 186:8  
 186:12 187:12,15,21  
 188:4,12  
**muddying** 169:13  
**multi** 243:19  
**multifaceted** 121:6  
**multiple** 57:10 142:19  
 210:7  
**Murdock** 26:14  
**Murphy** 9:6  
**mute** 43:5 67:21 139:18  
**muted** 8:21 11:18,19,20  
 14:15 92:20

# N

**N** 11:21 12:1 70:19  
 85:22 98:5  
**NACIQI** 2:1 5:7,9 6:8,15  
 6:21 10:1 23:11 48:3  
 71:4 76:4 180:18  
 219:2 224:13 231:13  
 231:14 233:1,14  
 236:3 239:5  
**NACIQI's** 6:22  
**NAFLAC's** 123:19  
**name** 7:16 12:3 14:21  
 46:17 53:8 96:22 97:6  
 99:18 104:21 119:4  
 145:18 147:4 178:1  
 208:13 224:19 232:13  
 233:3 259:8  
**names** 53:9  
**narrative** 33:18 114:18  
 114:22 115:3,7,16  
 126:4 149:4 156:3  
 258:20  
**nascent** 57:16  
**national** 1:3 5:5 7:6  
 99:7 124:1 185:3  
 247:20  
**nationally** 5:20 100:6  
 165:15 171:3 178:7  
 226:9 234:6  
**Native** 7:15 20:10  
**natural** 195:11 196:15  
**nature** 21:19 163:20  
**nearby** 137:20  
**nearly** 182:1  
**necessarily** 44:15

119:5 137:8 194:19  
 229:7 241:22 242:13  
 264:18  
**necessary** 31:19 139:1  
 139:6 265:13  
**need** 19:15,16 52:11  
 64:6,12 72:7,13 90:17  
 92:19 111:12,17  
 137:8 164:19 167:3  
 194:19 225:5 241:19  
 242:5 251:3 258:11  
 259:18 260:7 271:18  
 273:22 275:1,9 276:3  
**needed** 18:10 24:6  
 33:19 54:16 58:11  
 68:8 80:19 126:15  
 195:14 237:7,8  
 258:18 262:22 274:15  
**needs** 31:14 118:6  
 182:7 246:2 265:9  
**negative** 231:19 243:19  
**neighborhood** 137:15  
**neither** 193:7  
**net** 21:10  
**never** 24:13 140:21  
 152:9 204:6 260:21  
**new** 9:7 16:10 18:6 36:1  
 39:9,17 43:14 58:21  
 59:20 61:13,15 62:14  
 68:10,14,18,22 75:18  
 88:20 92:10 111:11  
 111:18,21 113:8,19  
 130:16 146:17 162:17  
 163:8 172:19 176:6,6  
 180:20 181:14 189:17  
 194:17 195:7 200:19  
 202:21 231:9 235:7  
 236:12 242:18  
**news** 39:7  
**nicely** 249:6  
**Nicole** 2:4 10:16 11:18  
 11:19,19 12:4 14:11  
 16:7 85:8,20 87:9  
 88:18 97:3 98:3,6  
**nimble** 42:2  
**nine** 244:13  
**non-** 86:3 103:16  
 158:19 196:12 216:17  
 223:6  
**non-compliance** 79:6  
 83:3 85:2 125:4 126:7  
 216:11  
**non-compliant** 73:5  
 74:21,22 75:13 81:22  
 103:5,19  
**non-degree** 175:17  
 176:18 187:13  
**non-degree-** 181:18

188:13  
**non-degree-granting**  
 176:4 183:20 185:4  
**non-HEA** 108:16  
**non-profits** 128:11  
**noncompliance** 30:19  
**normal** 122:7 149:15,17  
**normally** 49:2 174:3  
**note** 56:12 107:12  
 114:11 236:10  
**noted** 13:11 16:9 33:21  
 56:19 69:3 103:3  
 134:22 139:8,20  
 165:4 168:14 231:18  
 238:19 243:10 247:3  
**notes** 236:14  
**notice** 114:9 216:9  
 251:15 253:13  
**noticed** 69:11 126:22  
 134:10 216:5  
**noticing** 88:8  
**notification** 102:10  
 138:21  
**notifications** 102:21  
 158:18 159:15  
**notified** 114:6 221:8  
**notifying** 251:11  
**November** 30:8 39:2,3  
 58:22 59:2 64:22  
 73:15,17  
**number** 20:8 44:22 46:4  
 125:22 129:21 142:6  
 142:15 147:13 154:14  
 157:2 188:13 190:13  
 193:2 207:9 247:13  
 255:13 256:17 264:16  
 264:20 265:2  
**numbers** 43:10 206:14  
 255:11  
**nurse** 5:22 252:3  
**nursing** 176:1 206:11

# O

**objection** 174:9 221:16  
**objective** 29:5 234:10  
**objectives** 29:21 53:18  
 63:15 183:13  
**obligation** 169:2  
**observations** 12:19  
 13:6 39:17 130:18  
 178:20 218:16 225:21  
**observed** 100:19  
 153:22  
**observers** 250:22  
**obstacle** 195:3  
**obtain** 191:10 204:16  
**obtained** 109:5  
**obtaining** 188:16

**obvious** 73:11  
**obviously** 61:13 62:13  
 62:14 79:14 84:20  
 118:9 122:21 168:10  
 198:22  
**occasions** 200:22  
**occur** 87:1  
**occurred** 136:5 154:4,6  
 192:3 242:17  
**occurs** 258:6  
**October** 12:22  
**odd** 231:3  
**offer** 176:9 204:17  
 271:21  
**offered** 14:4 28:2,4  
 46:12 114:1 223:19  
**offering** 10:21 12:13  
 13:22 46:15 68:13  
 183:16  
**offers** 63:16  
**office** 1:1 6:19 85:11  
 135:18 213:5  
**officer** 2:10 15:20 94:13  
**officers** 25:22  
**official** 2:2 5:9 12:11  
 71:5 75:4 82:9,10,21  
 100:5,16 113:21  
 115:18 160:3,15  
 162:7 178:6,16 219:3  
 225:3 226:8  
**official's** 225:13  
**OGC** 96:18 167:11  
**Ohio** 191:1  
**old** 171:2  
**Olivet** 37:9,14,20 38:6  
**on-campus** 17:21  
**on-site** 250:2  
**once** 18:4 36:10 69:20  
 76:11 145:16 148:5  
**one-year** 46:9  
**ones** 46:18  
**ongoing** 48:1 62:13,15  
 76:19  
**online** 34:6 134:8 147:3  
 185:17  
**onsite** 185:22 187:9  
**open** 112:19,19 134:14  
 177:17 206:18 269:8  
**opened** 191:10 201:16  
 206:10  
**opening** 66:17 67:10  
 181:7 232:19 235:15  
**operate** 39:10 208:19  
 210:11  
**operating** 214:3  
**operation** 214:9 215:19  
**operationally** 76:1  
**operations** 2:19 182:19

215:2,10  
**opportunities** 20:12  
 25:16 34:1 126:20  
 132:20 154:16  
**opportunity** 10:5 14:19  
 36:14 56:16 67:1  
 104:19 105:8 114:1  
 124:15 139:4 179:3  
 181:20 189:1 196:7  
 199:1,7 202:16  
 239:12 244:7  
**opposed** 173:21 227:4  
**option** 94:20  
**options** 73:5 74:3 75:5  
**optometry** 164:5 252:3  
**order** 46:11 64:13 90:8  
 91:9 151:4 174:2,3  
 217:20 255:2 274:19  
**orders** 23:19  
**ordinarily** 261:7  
**ordinary** 190:13  
**Oregon** 105:2  
**organization** 105:20  
 118:13 119:2 183:1  
 183:10 193:14 194:15  
 207:22 208:10,10,15  
 209:5 210:8,12  
 215:17,22 226:14  
 258:15  
**organization's** 183:12  
**organizational** 225:9  
**organizations** 57:14  
 112:22 113:1 118:18  
 118:18,19 133:2  
 182:20 200:18 208:9  
**organized** 276:3  
**orientation** 119:6  
**original** 13:4 16:20 77:6  
 90:21 91:5,20 92:7  
**originally** 217:13  
**ought** 85:6  
**Out/program** 265:21  
**outcome** 27:18 47:2  
 61:13 62:6 77:1 161:9  
 161:15 168:21  
**outcomes** 15:6 29:10  
 29:13,14,17,17,22  
 30:2,6,9,15 31:11  
 53:18 55:21 56:2  
 57:17 58:20 59:3,21  
 60:7,9 63:7,9,13,17  
 63:18 64:1,10,15 65:7  
 65:14,19,21 74:13  
 75:7 86:5 89:12 157:6  
 188:22 250:4  
**outliers** 140:7  
**outright** 257:10  
**outside** 11:6 122:10

137:15 139:22 142:10  
 191:11  
**outstanding** 196:7  
 225:7 260:1 263:5  
**overall** 23:4 41:3 62:21  
 131:21 184:8 215:22  
**overcome** 199:5  
**overnight** 85:3  
**overstepping** 130:6  
**overview** 34:12 106:9  
**Oxford** 269:18,20

---

**P**


---

**P** 2:14 98:1 104:3  
**P-R-O-C-E-E-D-I-N-G-S**  
 5:1  
**p.m** 172:18 173:2,7,9  
 173:10 221:2 222:14  
 222:16,17 272:2  
 274:6 276:17  
**pace** 221:10  
**Pacific** 2:15 105:2  
 137:13,17  
**page** 201:20  
**pandemic** 22:4 42:6  
 48:22 50:5  
**panel** 127:3,7,13,16,19  
 129:9,13 130:11,17  
 131:7 232:11  
**paper** 65:3  
**parachurch** 18:22  
**parameter** 123:16  
 124:13 143:7,15,16  
**parameters** 121:9,13  
 123:13 125:3,11  
 150:9,10  
**paramount** 29:9  
**paraphrase** 155:19  
**parent** 207:22 208:10  
 208:10,15  
**part** 22:19 30:11 42:9  
 48:17 50:15 51:6 62:6  
 62:20 67:17 69:19  
 80:20 96:16 109:21  
 126:22 127:17 147:3  
 156:14 161:4 164:16  
 174:19 176:9 189:18  
 192:14 193:16 198:8  
 198:9 204:18 212:10  
 227:3 237:16 250:3  
 261:8 275:14  
**part-time** 15:21 21:13  
 21:22 47:9  
**partially** 162:19  
**PARTICIPANT** 72:21  
**participate** 45:2,2,5,12  
 108:19 183:21 184:4  
 224:3 274:16

**participating** 6:5 44:4  
 45:8  
**participation** 6:13  
 252:9  
**particular** 38:4 52:22  
 67:3 75:8,10,11 89:7  
 118:20 126:2 129:16  
 136:8 140:20 145:10  
 148:12 155:4 196:9  
 199:9 233:10 264:4  
 265:19  
**particularly** 16:6,14  
 27:17 43:9 44:7 46:18  
 47:6 106:16 111:9  
 206:3 227:17 239:20  
 263:20  
**parties** 102:22  
**partner** 105:5  
**partners** 200:1  
**parts** 57:11  
**party** 10:3 70:17 101:13  
**pass** 120:2,7 121:11  
 122:21 123:19 141:17  
 142:15 143:17 153:21  
 185:2 246:20 247:4  
 249:14,18,19  
**passage** 120:17 122:18  
 123:3,6 126:5  
**passes** 96:2 172:17  
 220:20 271:12  
**passing** 120:21  
**pat** 190:14  
**path** 29:5  
**pathway** 111:11 155:21  
**Patrick** 177:12  
**Paul** 2:3 97:22 98:1  
**pay** 196:3,7 251:8  
**paying** 119:20 195:3  
**payments** 194:18  
**pediatric** 264:8,9  
**peer** 17:5 186:19 264:2  
**peers** 105:18 264:4  
**Pell** 21:5  
**penalty** 251:8,8  
**pending** 117:7,7  
**Pennsylvania** 176:6  
**people** 44:3 47:10 96:2  
 98:11 119:3,20  
 120:20 121:2 127:7,8  
 127:20 128:9 134:1  
 137:7 173:17 174:21  
 221:3 222:2 227:16  
 240:17 251:6 273:22  
 274:18  
**percent** 20:18,21 21:4,5  
 22:1,6,6,15,17 44:1  
 44:15 45:22 56:21  
 57:4,5,8 68:13 132:13

132:14 140:7 149:18  
 185:3 204:21,22  
 205:1,6,16,16,17  
 215:11 255:14  
**percentage** 21:13 44:3  
 47:10 57:2 247:3,8  
 255:3,4  
**perfect** 88:4 151:15  
**perfection** 93:12  
**perfectly** 119:2  
**performance** 19:12  
 149:22 182:19 183:7  
 185:19 186:17 187:2  
 187:16,22  
**period** 17:22 22:22  
 24:17,21 27:1 42:10  
 50:19 55:8 66:21,22  
 75:17 100:13 101:7  
 101:10 113:5 115:5,9  
 124:14 142:11 158:11  
 158:22 178:12 179:14  
 196:3 200:21 225:16  
 226:4  
**periods** 112:20 123:15  
**Perkins** 205:5,6  
**Permanent** 116:21  
**persist** 150:1  
**person** 101:20 174:18  
 213:18 218:16 225:17  
 227:4,13,20 231:4  
 260:16,20  
**personal** 229:6 247:10  
**perspective** 76:20 81:1  
 127:21 129:1 131:10  
 212:19 228:5 229:9  
 229:11 236:3 238:3  
 252:21 253:9 256:21  
 257:1  
**perspectives** 109:17  
**petition** 9:22 12:5,18  
 13:18 16:13,20 32:20  
 36:15 53:1,2 75:19  
 99:20 100:18,21  
 105:4 106:18 114:2  
 114:12 116:18 178:2  
 178:18 180:15 181:22  
 184:7 189:5 224:20  
 225:19 233:12,15  
 252:11  
**Petrisko** 1:17 52:8,14  
 52:18 63:1,11 64:16  
 66:8 67:18 72:4 80:7  
 81:15 95:13 164:18  
 172:4 220:11 260:5  
 261:14 262:10 263:16  
 269:14,16,19 271:1  
 273:8  
**Ph.D** 252:3

**pharmacists** 132:20  
**pharmacist** 123:1  
**pharmacists** 106:6  
 107:21 110:3 132:16  
**pharmacy** 2:11,16 4:9  
 98:14,21 99:1,1,22  
 104:20 105:1,15,19  
 107:1,2,3,10,15,18,19  
 107:21 108:18 109:10  
 110:4,5,8 112:21,22  
 112:22 113:7 118:7  
 119:20 120:14,15,18  
 122:13 128:1,5,8  
 131:14,14 132:2,3  
 133:2 137:22 144:14  
 154:11 164:5 216:6  
**PharmD** 2:14,16 107:11  
 108:2  
**PhD** 2:12,14,15  
**phenomenon** 143:13  
**philosophy** 183:13  
**phone** 167:12  
**pick** 161:15  
**picture** 47:1 62:10 98:4  
**piece** 65:3 92:10 144:4  
 162:11 163:18 173:17  
 174:5 191:11 216:6  
**pieces** 136:19,22 137:8  
 144:3 216:11  
**pilot** 200:17 203:7  
**PIP** 129:20 130:5  
**pipeline** 195:7  
**pivot** 216:8  
**place** 40:2 57:21,22  
 123:14 167:21 187:1  
 191:14 194:17 202:2  
 203:16 214:12,15  
 241:11,15 244:22  
 252:20  
**placed** 22:8 23:16 25:9  
 30:15 39:22 112:4  
 188:10  
**placement** 185:2 186:1  
 186:2 204:22 205:17  
 236:8 242:3,10  
**places** 29:13  
**placing** 27:2 38:8  
**plan** 25:2,3 28:9 32:9  
 35:16 54:17 64:3 68:2  
 68:22 69:19 156:6,20  
 157:7 199:5 222:5  
 265:10,13 266:1,6,13  
 267:2,13,19 268:5  
 275:19  
**planned** 53:17  
**planning** 24:8 26:20  
 28:15 53:14 54:3,13  
 184:5

**plans** 28:1 55:9,10 56:3  
 57:22 69:9,16 186:10  
 187:6 188:7 265:8,18  
 266:18  
**platform** 35:11 185:17  
**play** 92:11 126:14  
 130:21 252:7  
**pleasant** 43:22  
**please** 14:14 19:14 52:7  
 97:4 167:1 177:7  
**pleased** 180:19  
**plotted** 149:17  
**plus** 47:16 157:9  
**pockets** 42:12  
**point** 33:17 38:3 40:6,7  
 59:11 85:1 88:13,17  
 90:8 117:4 162:1,8,9  
 179:18 192:20 201:2  
 213:13 228:10 248:13  
 268:1 272:12  
**pointed** 62:9  
**pointers** 149:5  
**pointing** 145:2 156:12  
**points** 41:6 77:18 91:2  
 91:2  
**policies** 17:6 18:3 19:2  
 37:22 38:2 86:8  
 101:12 146:7 179:9  
 214:6,7,12,12,14  
 229:16 234:12,16  
 235:8 238:5,19 258:2  
 258:21  
**policy** 2:19 9:6 19:6  
 29:14 30:6 31:3,8  
 33:11 36:1 58:20,22  
 59:21 60:7 62:6 63:12  
 63:13,18,22 64:10,15  
 65:19 66:6 112:12  
 159:21 179:7 202:1,6  
 202:11 203:13,15  
 221:13 229:20 235:19  
 241:15 242:18 257:6  
 257:8,19,20 259:4  
 265:19 272:1 274:19  
 274:22 275:1,4,7,10  
 275:12,14,19  
**pool** 18:1 154:11,19  
**poor** 215:15  
**population** 31:14 47:9  
**populations** 20:13  
**portfolio** 197:2 214:22  
**portion** 89:18,22 99:13  
**position** 25:6 41:15  
 87:12 109:22 118:22  
 173:19  
**positions** 105:17  
 109:21 164:6  
**possibilities** 94:14

**possible** 91:6 143:8  
 151:19 174:6 221:18  
 250:7 257:17 263:12  
**possibly** 86:10  
**post-** 176:17 203:21  
**post-graduation** 160:5  
 160:17  
**post-secondary** 175:17  
 175:19 176:4 181:18  
 183:19 185:4 187:13  
 188:13 196:12 204:2  
 204:5,11 210:14  
**posted** 38:16,16 66:6  
 114:18 115:20 201:10  
**postgraduate** 165:17  
**POSTSECONDARY** 1:1  
**potential** 236:8 245:15  
 259:18,22 267:8  
**potentially** 33:6 272:9  
**PPE** 197:18  
**PPP** 197:14  
**practical** 19:21 83:18  
 176:1  
**Practically** 151:19  
**practice** 105:16 110:5  
 143:2 186:15 188:5  
 197:9,9 237:8 248:3  
 249:2,8 257:15  
**practices** 27:19 130:20  
 184:16 257:4  
**practicing** 122:22  
 247:17 253:1  
**practitioner** 227:3,10  
 227:15 230:13 231:9  
 231:10 236:6 237:2  
 237:14 238:7,16,21  
 240:4 242:22 260:15  
 269:1  
**practitioners** 109:13  
 117:18 118:11,19  
 228:11 229:18 230:1  
 230:9,16 235:18  
 236:11,14,21 238:1  
 242:7  
**pre-** 11:3 13:20 98:21  
 112:7  
**pre-accreditation** 107:9  
**pre-accredited** 17:8  
 20:7,20,22 23:5,8,12  
 23:21 26:16 28:7,10  
 33:6,12 35:2 45:6  
 59:12  
**pre-accredits** 20:2 99:3  
**pre-candidate** 115:15  
**pre-conference** 26:4  
**pre-doctoral** 223:9  
**precedent** 212:17  
**precipitating** 39:5

**predecessor** 224:11  
**predicament** 169:19  
**preempt** 127:16  
**prefer** 89:17  
**preference** 77:2  
**preparation** 16:19  
 28:18,21 141:5  
**prepare** 141:3  
**prepared** 213:8  
**preparedness** 112:14  
**prerequisite** 28:9  
**prerogative** 168:20  
**prescribed** 183:10  
**presence** 194:13  
**present** 1:11 2:1 14:7  
 36:14 232:9,20  
**presentation** 14:6 37:2  
 43:9 52:9 61:16 81:9  
 83:15 179:14,22  
 239:18 240:21 250:14  
 260:6,11 272:21  
**presented** 179:21 180:7  
**presenters** 273:5 275:7  
**presenting** 12:4 100:2  
**presently** 108:1  
**presents** 20:14 27:18  
**president** 2:15,19,20,21  
 2:21 7:12,20 8:5 9:2  
 15:2,10 48:7 104:8,14  
 104:22 105:18 137:12  
 180:12,20 181:1,14  
 181:15,16 190:1  
 193:1 194:12,15  
 196:4 217:2,3  
**presidents** 18:18 25:20  
 181:3  
**presiding** 1:9  
**Pressnell** 1:12 7:19,20  
 79:13 81:7 90:7,16  
 95:16 163:22 167:3,7  
 167:17 172:6 175:8  
 189:14 198:17 202:14  
 203:7,11,17 204:20  
 206:6 211:21 212:4  
 216:3 217:21 219:1  
 220:13 271:3  
**pressure** 51:9  
**presumably** 231:21  
**pretty** 57:16 62:10  
 73:12 76:17 134:14  
 140:3 144:8,14 161:7  
 218:4 221:10 240:21  
 251:17 253:5 267:11  
**previous** 16:18 76:15  
 109:7 194:12 196:4  
 217:2,2  
**previously** 13:15 63:20  
 68:19,20,21

<b>price</b> 21:10	139:3 153:17 169:20	266:4,7 267:1	187:10 253:12 266:12
<b>pride</b> 186:12 233:15	182:22 185:12 186:19	<b>program's</b> 114:21	<b>providers</b> 107:17
<b>primarily</b> 175:15 206:10	187:1 188:19 199:11	145:6 156:5,11 256:7	<b>provides</b> 9:19 17:12
<b>primary</b> 9:17 10:14	199:13,15 201:8,10	262:8	26:3 29:15 33:22
70:22 98:15 175:7	202:9,15,21 203:12	<b>program-</b> 184:22	34:12,14 110:14
189:13 218:18 223:2	203:15 204:12 214:5	<b>program-specific</b> 187:6	183:2
239:14 261:4	217:12 233:13 234:8	<b>programmatic</b> 108:6,14	<b>providing</b> 52:1 99:19
<b>principles</b> 237:6 257:14	234:15,20 235:7,11	223:7 230:6 268:7	106:19 157:2 178:2
<b>prior</b> 15:1 16:2 19:2	235:12 236:9 237:5	<b>progress</b> 24:22 27:1,13	188:19 199:1 217:17
33:13 51:3 75:20	242:18,19 243:3	30:19 32:9,22 33:8,15	224:20 253:12
159:14 174:12 236:10	245:1 250:4 256:2	38:11,12 53:12 54:18	<b>provinces</b> 20:5
236:13 238:10	264:3 272:3,11	55:1,7,22 56:10 58:12	<b>proving</b> 141:19
<b>privacy</b> 177:15	273:12	59:15 65:20 66:3,12	<b>provision</b> 237:15
<b>private</b> 24:10 132:6	<b>processes</b> 15:7 17:4,14	66:13,15 188:8	<b>provisions</b> 5:12
184:1 204:8 206:16	24:4	<b>progression</b> 121:18	<b>PTA</b> 128:12
<b>proactive</b> 192:20	<b>procures</b> 31:18	122:7	<b>public</b> 5:17 7:12 18:15
<b>probably</b> 61:8 81:10	<b>produced</b> 62:3,4	<b>prohibit</b> 84:8	18:20 29:18 30:10
89:15 139:2 151:22	<b>profession</b> 106:7 107:2	<b>prohibited</b> 237:13	36:3 38:3 40:7 60:12
163:8 197:13 205:8	118:7 121:4 123:8	<b>project</b> 30:7 47:11 59:1	63:3 66:18 109:13
205:14 206:7 208:2	128:8 154:15 182:14	61:13 63:2 64:18,21	113:2 114:7,9 115:2
240:6 251:15 254:19	233:17 248:18	65:6,8 66:12,20 72:8	117:18 118:12,21,22
266:15	<b>professional</b> 2:13	76:19 80:12 84:22	119:8,9,12,13,16
<b>probation</b> 23:16,17,18	15:16 16:1 17:11	87:5	127:2,8,15,19,21
25:10 38:8,14,22 39:3	28:18 98:22 106:1	<b>projected</b> 113:8	128:12,22 129:8,12
57:19 68:21 70:6,14	107:9 108:20 110:1,2	<b>prompt</b> 73:7	130:11,17,19 131:7
112:5 243:17 264:16	110:7,22 112:21	<b>prompted</b> 69:4 118:1	131:10 132:6 152:12
264:19 265:4,9,11	157:4 164:4 253:1	264:13	153:3 169:10 182:8
267:1,3,17,19 268:1	<b>professionals</b> 18:20	<b>prompts</b> 69:7	182:10 201:16 202:2
<b>probationary</b> 188:11	26:6 109:15 236:20	<b>proposal</b> 180:7	202:7 206:10 224:5
265:16	248:5	<b>proposed</b> 94:11,17	233:17 234:19 235:1
<b>probations</b> 89:9	<b>professions</b> 154:16	<b>proposers</b> 77:8	235:3 251:16,17
<b>problem</b> 80:21,21 82:5	175:21 235:22	<b>proposing</b> 201:1	252:6,7,10,12,14,16
91:12 94:12 124:6	<b>professor</b> 2:15 105:1	<b>protocol</b> 184:9 185:14	252:21 253:5,8
164:10 165:9 192:5	105:14 252:2	185:16 186:13 188:16	261:11 262:19
192:19 273:4	<b>program</b> 2:13 20:1 22:1	192:7	<b>public's</b> 182:4
<b>problematic</b> 75:22	26:13 29:16,21 36:4	<b>protocols</b> 234:13	<b>public-minded</b> 130:2
148:13 153:2 158:1	46:8,12 63:15,16	<b>proud</b> 18:11 20:11	<b>publicly</b> 256:12
227:9 240:10	68:14 106:1 107:11	<b>proved</b> 32:12	<b>publish</b> 5:19 29:20
<b>problems</b> 125:14	111:1,9 112:6,7,12,16	<b>proven</b> 185:6	63:14 256:11
150:21 151:11 153:12	113:22 114:1 115:15	<b>provide</b> 6:10 9:22 16:15	<b>published</b> 43:10
251:2	115:19 121:13 122:1	18:7 19:12 20:12	<b>Puerto</b> 99:4 176:7
<b>procedure</b> 173:14	123:18 124:4 126:21	25:15 27:8 32:6 39:16	195:12
265:20	134:8 136:8,15	47:22 65:20 81:20	<b>pull</b> 170:20
<b>procedures</b> 9:16	140:18 141:2,15	101:2 102:9,10 103:3	<b>pulled</b> 69:10
101:12 234:12,16	142:22 144:12 145:10	106:9 110:17 114:1	<b>punish</b> 79:19
235:9 238:6 258:2	145:17,22 146:5,15	124:5,8 136:20 144:7	<b>purpose</b> 74:3 144:17
<b>proceed</b> 259:20	148:4,5,16,19 153:16	144:20 158:12 175:20	147:7 185:6 200:14
<b>process</b> 6:11 9:13 16:8	153:19 155:4,16	179:2,4,8 186:4	235:21 242:22
16:16 22:20 32:1	156:18 157:4 168:14	201:20 202:12 203:1	<b>purposes</b> 188:15
35:21 36:2 37:3 40:5	176:14 183:15 186:5	235:16 236:8 243:17	215:13 239:20 256:1
40:5 51:6 61:12 62:12	186:11 234:3,8,17	243:20 245:19 250:20	<b>pursue</b> 46:12
62:13,16 65:1,11	235:14 236:18,18	256:5 266:1 267:1	<b>purview</b> 86:18 235:5
69:20 70:1 80:12	238:10,18 245:4,7,18	<b>provided</b> 6:2,8,18 13:12	<b>put</b> 39:5 52:7 53:9
105:7 106:20 110:15	247:13,19 248:1	18:8 26:12 41:7 42:7	83:14 123:14 136:21
112:11 116:16 125:8	249:2 256:4 258:10	53:3 101:6 112:16	137:9 144:21 165:20
126:10,19 127:1,2	259:20 261:21 262:1	115:8,10 116:3	166:3 169:18 173:18
133:22 134:18 135:9	262:9 263:6,14 264:7	146:16,21 149:16	194:16 200:8,16
135:11,14,16 138:15	264:8 265:3,8,9,22	156:19 163:6 185:20	201:3,9 204:6 205:6



240:5 241:11,15  
265:3  
**puts** 126:14  
**putting** 154:5 164:21  
165:5 203:6 211:10  
**puzzle** 136:22

# Q

**qualifications** 56:13,19  
**qualified** 31:16 57:2  
262:17  
**qualify** 241:13  
**qualitative** 183:11  
**qualities** 31:9  
**quality** 1:4 5:6 6:2 7:7  
17:3,7 19:14 27:15  
30:22 31:2,4,6,10  
34:1 35:13 36:4  
106:22 107:15 112:15  
118:7 129:6 131:11  
154:3 182:5,16 183:3  
184:19,21  
**quantitative** 87:15  
183:11  
**question** 37:1,5,13  
40:22 44:5,18 47:3  
54:6 57:10 58:5 64:17  
66:9 67:22 73:2 82:22  
83:17 88:15 92:4  
101:18 137:12,19  
138:16 143:20 148:3  
148:4,6 150:14 153:6  
153:7 155:8 156:2  
157:16 158:8 159:7  
159:14 160:9,22  
168:9 173:13 179:18  
190:7,18 194:11  
198:16 206:1 208:1  
212:8,22 213:9  
216:20 217:15 228:20  
232:21 241:2 242:4  
244:11 246:17 249:10  
253:21 258:20 261:2  
261:15 263:19 264:2  
264:13 267:14,20  
274:11  
**questionable** 56:15  
**questioners** 19:3  
**questioning** 74:15  
117:9  
**questions** 10:1 14:9,10  
16:15 36:2,17,19 40:9  
43:16 52:21 59:6 73:1  
73:2 101:15,17 102:1  
104:1 116:16,22  
139:11,17 149:20  
157:11 159:10 179:16  
179:17 189:12 198:19

203:19 206:18,20  
211:19 215:6 226:14  
226:16 228:18 231:15  
233:1 239:10 241:19  
246:18 250:12 255:6  
260:3,12 268:11  
269:22  
**quick** 50:8,11 85:21  
221:10 222:12 263:19  
**quickly** 27:12 87:6  
272:5  
**quite** 50:2 88:3 119:17  
133:20 154:17 174:6  
195:14 205:5 206:14  
206:14 207:8 214:18  
214:21 218:7 253:13  
257:9  
**quorum** 220:20 221:15  
221:18 272:13 273:12  
275:1,10,11  
**quote** 248:9,11 257:11  
**quoting** 55:18

# R

**R** 8:5,9,12 36:20 40:10  
42:20 71:2,21 77:14  
77:17 84:16 90:22  
92:16 93:14,20 94:4  
95:11 96:7 104:12,16  
137:21 138:3 166:5  
166:10 170:5,19  
171:8,12 172:2  
219:15,19 220:9  
270:5,9,21  
**R71** 102:18 103:9  
114:13  
**R81** 116:2,9 146:2  
158:13 159:19  
**radar** 39:6  
**raise** 78:22 82:8 129:15  
212:1  
**raised** 65:21  
**raising** 82:20 162:12  
**range** 24:20 26:22 58:7  
67:5 75:22 142:4,6  
183:17 204:22 207:13  
**ranged** 132:5  
**rank** 255:2 263:1  
**ranks** 105:13 196:8  
**rate** 21:16 22:10,16  
44:6,6,15 45:20,21  
47:1 120:19 121:15  
122:19 123:6,19  
126:8 143:17 153:21  
185:5 206:3 247:1,4  
249:4,10,20  
**rates** 22:3,6,13 32:2,2  
44:13 47:8 63:6,6,6

84:4 120:17 123:3  
126:5,10 141:18  
142:15 164:7 185:1,2  
185:2 186:1,3 187:3,5  
187:16,16 206:5  
246:20 249:14,15,18  
250:6  
**rationale** 147:10  
**re-** 245:6  
**re-accreditation** 245:7  
**re-recognition** 235:12  
**re-vote** 167:15  
**reaccreditation** 245:14  
**reach** 275:16 276:9  
**reached** 199:22  
**reaching** 190:12  
**reacted** 154:20  
**read** 13:20 55:14 99:14  
232:3 244:6  
**readers** 9:17 10:14 19:3  
98:15 116:21 189:13  
218:19 223:2 239:15  
261:4 268:17  
**reading** 138:15,19  
149:4 163:13 198:15  
226:22 228:14 232:2  
**readmission** 233:12  
235:6  
**reads** 228:11  
**ready** 49:21 86:9 104:5  
**reaffirmation** 25:9 55:2  
55:5,6,15 56:9 58:9  
59:9 70:1  
**reaffirmed** 23:15 53:22  
**real** 85:21 91:3 92:1  
120:4,19 127:21  
173:2 237:18  
**reality** 137:6  
**realized** 201:14 202:1  
**reason** 19:17 73:10  
93:22 162:12 163:10  
196:9 230:17 240:10  
246:11  
**reasonable** 185:6  
268:21 269:6  
**reasoning** 101:3 147:14  
**reasons** 38:15 102:10  
103:16 113:20 114:17  
115:17 150:19 152:12  
159:18,20 165:3  
172:14 247:10  
**reauthorization** 182:1  
189:5  
**recall** 102:19  
**receipt** 68:6 259:21  
**receive** 21:5,6 124:21  
179:13 202:7 205:9  
**received** 11:13 110:8

179:11 184:11 200:6  
201:4,10,11 226:3  
**receiving** 59:17  
**recognition** 4:4,8,12,16  
10:11 11:6,10 12:12  
12:15 13:9,14,16,20  
17:22 24:17,21 27:1  
35:20 36:7,9,16 50:15  
71:7,18 75:17,19 87:2  
91:21 92:14 99:21  
100:6,11,13 107:7,13  
108:15 112:10 114:3  
165:15 167:19 176:3  
178:3,7,11,13 179:13  
208:19 219:4 222:21  
224:2,21 225:4,8  
226:9 234:1 235:10  
236:5,10 245:7  
261:16 269:11 272:3  
**recognitions** 210:1  
**recognize** 81:4 174:7  
210:13,13 232:9  
**recognized** 5:20 11:9  
12:9 17:1 80:10 99:8  
100:7 107:5 108:10  
111:3 171:4 178:8  
218:7 224:12 226:9  
**recognizing** 209:19  
210:9  
**recollection** 103:13  
**recommend** 60:16 71:4  
79:4,7,9 82:16 160:2  
160:14 219:2  
**recommendation** 12:10  
12:16 36:7 71:15  
100:4,17 102:5 158:9  
158:22 162:4,13  
165:13 168:1 171:3  
178:5,17 225:18  
230:18 236:4 269:10  
**recommendations**  
164:21 165:5  
**recommended** 79:3  
128:20  
**recommending** 96:4  
226:7  
**recommends** 225:11  
**reconvene** 276:14  
**record** 76:12 85:19 96:9  
146:16 173:9 193:16  
222:16 276:17  
**recorded** 167:4  
**recording** 167:2 170:16  
170:18  
**records** 6:21  
**recovering** 19:16 194:6  
**recovery** 25:1,3  
**recruit** 128:2,9

**recruiting** 257:4,7,9  
**recruitment** 49:10  
 149:7 257:12,22  
**recuse** 19:7  
**recusing** 275:11  
**red** 192:2 215:4  
**reduce** 75:17  
**reduction** 155:9  
**refer** 261:20  
**referenced** 24:5 114:4  
**referencing** 211:1  
 249:19  
**referred** 12:7 100:1  
**refers** 182:21  
**reflected** 13:15,17  
**reflecting** 211:6  
**reflective** 36:2  
**reflects** 22:2 72:7 254:9  
**refreshment** 226:11  
**regard** 26:19 27:16 29:2  
 58:18 60:2 67:6 256:8  
**regarded** 259:17  
**regarding** 6:11 12:5  
 19:8,12 25:2 37:14  
 40:4 58:16 82:19  
 94:14 112:2 115:22  
 116:17 159:4 181:21  
 184:13,16 185:19,22  
 225:7 232:21 265:18  
**regardless** 20:1  
**regards** 61:22 72:17  
 87:12 180:15 215:19  
 233:9 261:5 262:13  
 268:22  
**region** 188:14 191:11  
**regional** 99:7 190:21  
 191:5  
**regular** 65:11 102:20  
 133:1 173:6  
**regularly** 101:6  
**regulated** 248:4  
**regulation** 81:19 85:13  
 86:6 113:15 116:9  
 158:15 226:22 227:8  
 231:10 236:12,13  
 268:21  
**regulations** 16:10,12  
 36:1 48:18 69:6 75:18  
 79:11 136:10 146:6  
 168:19 235:7 264:17  
 264:20 265:2  
**regulators** 117:17  
 118:12,18 265:5  
**regulatory** 251:16  
 266:21  
**Reha** 97:2  
**reinforce** 186:21  
**reinitiate** 153:17

**reinstatement** 25:7  
**reinstated** 43:14  
**reiterate** 83:11  
**rejected** 131:19  
**related** 6:22 25:14  
 29:14 31:4 32:18  
 34:14 35:6 37:20 38:6  
 38:21 42:3 51:21  
 156:2 187:8 225:8  
 234:4 235:17 245:4,6  
 255:22 264:14  
**relates** 34:17 37:17  
 38:1,3 44:13 49:9  
 50:5 51:12,17  
**relatively** 130:16  
**relaying** 154:18  
**released** 113:10  
**relevant** 102:22  
**reliable** 6:1  
**relief** 197:15  
**reluctant** 251:1  
**rely** 24:10 130:9 238:10  
**remained** 183:18  
**remaining** 13:10 37:5  
 179:1  
**remarks** 36:10 232:19  
 235:15  
**remedies** 188:7  
**remedy** 145:21  
**remember** 41:8 74:7  
 75:18 130:1 195:10  
 230:4 272:22  
**remind** 86:19  
**reminding** 260:10  
**remiss** 11:16 96:12  
**remove** 89:18,19,21  
 152:5 165:14 171:2  
 174:4,9,22  
**removed** 23:16,20 39:1  
 39:2 68:10,17 196:8  
**renew** 12:11 100:5  
 160:3,15 178:6 226:8  
**renewal** 4:4,8,12,16  
 9:14 10:11 11:10 12:5  
 12:17 36:7 89:22  
 99:20 100:15 178:2  
 178:14 183:16 184:7  
 222:21 224:20 243:14  
**renewed** 173:22 224:16  
**renewing** 39:10 85:5  
**repeat** 142:7,8  
**report** 22:20 27:13 32:1  
 32:9,22 33:8 39:1,7,7  
 39:16 44:2,11 45:19  
 54:18 55:1,7 56:1,10  
 58:13 62:3,4,7,21  
 65:15,17,20,21 66:4  
 66:15 69:10 72:15

73:7,9 76:10,11 77:2  
 77:3 78:17 79:4,7,10  
 82:6,7,11,11,18 83:4  
 83:7 84:19 85:6,17,18  
 89:1,7,20 91:16 93:18  
 100:2,8,10,13 102:4  
 117:6 127:3 138:15  
 138:22 139:6 143:21  
 154:1 162:14 177:2  
 178:9,10,12,22 192:7  
 192:8,21,22 193:11  
 198:8,9 217:5,6 219:5  
 224:15 225:12,14  
 226:11,21 228:19,22  
 238:9 241:15,20  
 262:14 269:10  
**reported** 64:5 124:2  
 139:20 254:10  
**reporting** 22:14,22  
 30:12 35:12 83:20  
 186:13,20 239:9  
 245:8,11,14 246:7  
 262:13 263:4,13  
**reports** 24:22 27:2  
 30:14,15,20 37:14  
 39:14 66:13,13  
 111:15,15 128:20  
 142:22 184:8 186:10  
 187:19,20 188:3  
 229:2  
**represent** 180:19  
**representation** 234:22  
 235:2  
**representative** 203:8  
 229:18  
**representatives** 9:21  
 14:7 25:5 101:14  
 128:15 179:15 226:13  
**Representing** 180:10  
**represents** 47:6  
**reputation** 190:17  
**request** 13:12,17 116:6  
 239:5,8 241:21  
**requested** 53:5 245:21  
**requesting** 256:18  
**requests** 42:9 184:12  
**require** 5:18 19:20  
 75:18 78:16 79:3 82:6  
 111:6 162:6 227:1  
 238:20  
**required** 24:22 25:2,3,4  
 27:7 29:20 30:19 32:6  
 32:10 33:2 39:15  
 56:20 58:8,13 63:19  
 63:20 66:6 68:2,9,20  
 68:21 69:18 70:2,4,7  
 70:12 74:14 83:12  
 86:21 87:14,18 99:11

101:7 103:7 108:15  
 113:17 114:7 115:4,9  
 136:9 219:4 224:7  
 229:7 230:1,6 239:9  
 266:10  
**requirement** 58:18  
 108:18 115:13 116:4  
 116:13 123:7 155:10  
 205:1 237:16 241:16  
 243:1 245:9,11 246:8  
 257:6 266:22 267:13  
 267:16,18  
**requirements** 13:8  
 89:11 99:13 145:12  
 176:16 179:7 185:6  
 186:14,20 224:8  
 225:10 240:19 245:15  
 251:17 263:4,14  
 265:22 268:4  
**requires** 6:6 17:15 33:7  
 33:14 63:13 75:8 86:6  
 101:2 113:15 184:18  
 186:8 257:13 266:22  
 267:18  
**requiring** 27:4,13 33:11  
 69:15 84:18,19 89:6  
 187:5,18 188:7  
**research** 15:5 84:9 87:5  
**residential** 51:3,5  
 200:12  
**resolve** 27:12  
**resource** 18:19  
**resources** 24:7,14,19  
 25:14,17 31:18 35:9  
 51:19,22 67:9 83:22  
 109:2  
**respect** 84:3 185:8  
 214:11  
**respectfully** 116:6  
 239:8  
**respond** 10:6 14:8 75:3  
 101:15 134:13 136:16  
 139:5 155:10 179:16  
 258:22  
**responds** 10:7  
**response** 10:1 39:16  
 114:21 115:11 116:1  
 117:2 124:8 136:1,2  
 145:9,9 158:7 182:4  
 201:17  
**responses** 13:5 39:22  
 157:15  
**responsibility** 22:19  
 32:3 122:1 210:20  
 217:8,9,11 257:12  
**responsible** 155:20,21  
 210:10,14,17 257:13  
**responsive** 136:15

**rests** 182:15  
**result** 31:15 153:21  
**resulted** 36:1 65:5 66:3  
 102:4  
**resulting** 29:22 39:1  
 63:17 184:9  
**results** 53:20 64:19  
 151:1 186:7  
**resumed** 96:9 173:10  
 222:17  
**retention** 32:2 63:6  
 84:3  
**retrospective** 239:1  
**retrospectively** 241:6,9  
**return** 96:5 173:2,4  
**revamp** 112:11  
**revealed** 109:6  
**revenue** 211:15 255:4,7  
 255:9,18  
**revenues** 24:12  
**reverse** 274:18  
**reviewed** 30:9 59:3  
 65:17 158:19 186:21  
 258:3  
**reviewing** 29:10 47:15  
 52:3 76:18 86:20  
 106:18 240:7  
**reviews** 57:17 66:2  
**revise** 113:7 185:13  
**revised** 238:19  
**revolve** 43:16  
**revote** 170:13  
**Reza** 2:15 104:9,21  
**Rhea** 100:3 101:20  
 106:17  
**rich** 125:15  
**Rico** 99:5 176:7 195:12  
**ridiculous** 89:10  
**rigor** 55:20 188:15  
**rigorous** 234:2 257:14  
 258:6  
**risk** 33:7 187:14,22  
**road** 237:18  
**Robert** 1:17,18 8:11,12  
 10:15,16 36:18 40:9  
 71:1,20 77:13 90:22  
 91:14 95:10 98:15,18  
 172:1 220:8 223:3  
 270:20  
**Robert's** 91:9 174:1,2  
**robust** 214:21 234:13  
 243:3  
**rocky** 19:16  
**role** 15:22 127:12 130:2  
 130:7,22 182:8  
 200:11 225:17 227:20  
 228:1 231:2 238:12  
 238:17 239:4 243:5

252:6  
**roles** 16:3 105:20 227:5  
 227:19 231:5 237:4  
 237:14,20 238:6  
**roll** 93:8 185:16  
**Ron** 16:18  
**Ronnie** 1:13 8:4,5 81:17  
 84:15 86:5 93:19 94:2  
 166:9 171:11 219:18  
 221:19 270:8  
**Ronnie's** 89:6  
**room** 78:21 137:16  
 167:12 181:1 194:14  
 212:22  
**root** 122:8 124:6 125:9  
 151:10 153:9  
**rose** 105:13  
**Roslyn** 1:14 8:8,9 93:13  
 166:4 170:4 171:7  
 219:14 270:4  
**roster** 230:8  
**rosters** 225:15 229:5  
**Rotter** 233:8  
**roughly** 109:9  
**round** 82:12 102:1  
**route** 76:4 274:9  
**routinely** 156:4,16  
**RPh** 2:12,15  
**rubric** 30:10 62:5 64:10  
**Ruffo** 181:2,16  
**Rufo** 2:21 191:17,19  
 193:7 210:11 217:11  
**rule** 124:11,11 205:15  
 230:21  
**rules** 91:9 174:1,2  
 251:7  
**ruminating** 74:2  
**running** 136:11

---

**S**


---

**S** 2:4 9:1 12:4 60:3  
 63:10 95:22 97:6  
 167:11 172:16 232:12  
 233:3 241:1,4,22  
 244:10 247:12 249:21  
 252:8 253:20 255:14  
 255:20 257:20 259:5  
 261:13,17 263:1  
 264:1 265:15  
**SACs** 221:14 222:3  
 272:3 273:4,5,18,19  
 274:4 275:5,20  
**sake** 91:1,4  
**salaries** 132:19  
**salary** 132:8 140:14,15  
**sample** 158:12  
**sanction** 70:5 182:13  
**sanctions** 27:3 33:3

38:15 66:18 251:4,5  
**sand** 205:18  
**Sanjay** 3:13 232:15  
 233:4  
**sat** 253:22  
**satisfy** 227:4,14 241:21  
 250:12  
**saving** 197:15  
**savings** 198:3,7  
**saw** 22:12 46:4 98:3  
 120:10 190:21 246:20  
 249:11 250:6  
**saying** 37:15 56:14  
 61:21 73:13 76:8  
 79:18 80:4 129:15  
 146:14 158:3 163:10  
 214:11 222:9 244:11  
 251:18 260:15 273:20  
**says** 69:9 80:20 182:12  
 211:3 231:10 257:11  
**scale** 33:17  
**scenarios** 73:3  
**schedule** 173:1,6 207:8  
 237:4  
**scheduled** 30:11,17  
 32:8 271:19,22  
**scholarity** 233:21  
**school** 2:15 15:11  
 103:11,16 105:1,14  
 128:5 132:6,7 133:6  
 136:20 144:9 147:16  
 152:1 182:12 192:5,8  
 193:3 195:6 201:11  
 207:10,11 210:1  
 211:8 252:2 254:9  
 256:22 266:11,19  
**school's** 122:11  
**school-by-school**  
 133:10  
**schools** 2:18 4:13  
 112:21 117:16 133:11  
 133:14 139:22 140:8  
 150:3,20 151:9,16  
 153:8 157:1 173:5  
 175:6,12,14 178:4  
 181:7,12 182:9 184:1  
 188:15 190:2,9,11,16  
 191:13,19 194:17  
 195:3,7,14,17 196:2,6  
 196:12,13 200:17,18  
 201:7 204:8 206:10  
 207:5,19 208:12,18  
 208:20,22 209:3,8  
 210:15,16,20,22  
 211:3,4,9,13,17  
 212:13 214:13 220:22  
 255:3  
**Schools'** 211:16

**scope** 11:6 12:13,15  
 13:13,14,16,19 36:9  
 71:17 107:7,13 176:2  
**score** 23:4 32:3 102:12  
**scorecard** 47:5 133:9  
**scored** 22:21  
**scores** 22:19 23:7 41:3  
 140:11 149:10  
**scramble** 83:16  
**screen** 92:8 93:7  
 104:11 181:4 254:8  
**scroll** 145:9 166:22  
**scrolling** 148:7  
**scrutiny** 38:21  
**SDO** 168:1,1 219:7  
 269:6,11  
**SDO's** 85:17  
**search** 147:3 148:17  
**second** 5:4 7:5 21:21  
 23:2,18 24:15 28:20  
 39:8 53:16 67:20 71:8  
 71:10,11 77:9,11  
 83:15 89:21 90:15  
 98:12 146:5 160:18  
 160:20 174:18 201:22  
 213:19 219:8,9  
 236:17 249:16 250:9  
 269:12,14 274:20  
**secondary** 2:18 4:13  
 173:5 175:6,12,15  
 176:18 178:4 181:6  
 181:10 195:19 196:14  
 203:21,22 204:4,8  
 207:20 208:6,19  
 209:3,15 210:3,14,22  
 211:3,4,9,17 212:13  
 213:20 214:4,8  
 215:19 220:22  
**seconded** 92:17 160:6  
 269:15  
**second** 170:8  
**seconds** 160:21 167:14  
**secretary** 5:18,22 6:7,9  
 99:8 101:3,7 102:11  
 102:21 113:17 114:6  
 114:16 115:1,4,8,16  
 191:7 224:2  
**secretary's** 13:9 99:12  
 101:1 176:15  
**section** 5:10,17,18 6:8  
 69:10 145:5,17  
 147:16 148:8 174:5  
**sections** 5:16 179:10  
**sector** 48:12,17 49:14  
**sectors** 40:15 48:14  
 50:9  
**seeing** 77:1 101:22  
 104:11 129:18 151:8

157:10 163:14 240:15  
240:16 251:4 267:9  
273:13  
**seek** 190:16 197:16  
234:4  
**seeking** 108:9 195:8  
234:11  
**seen** 37:13 40:14 41:2,3  
41:17 42:5 51:11 80:8  
81:12 125:21 127:6  
137:19 195:3 232:6  
**sees** 193:1  
**self** 61:20 62:18,19  
111:7  
**self-appointing** 118:17  
**self-assess** 33:15  
**self-assessment** 33:13  
**self-regulation** 182:16  
257:13  
**self-study** 156:17 201:9  
**selling** 234:17  
**semester** 136:5  
**send** 194:19 202:22  
221:6 273:15 276:6  
**sending** 27:3 159:20  
**sends** 233:9  
**senior** 3:11 8:18 12:11  
15:17 71:5 75:4 82:8  
82:9,16,21 94:13  
100:4,16 160:3,14  
162:6 178:5,15 219:3  
225:2,13 226:7  
254:10  
**sense** 27:10 73:22 80:4  
83:18 88:7 89:2 126:9  
131:13 140:4 146:12  
151:15 198:14  
**Sensing** 159:11 165:13  
268:11 270:1  
**sensitive** 267:4  
**sent** 35:2 68:7 134:12  
146:1 217:1 259:14  
**sentence** 129:4  
**separate** 47:11 99:12  
174:19 176:15 181:4  
207:21 208:9,15  
214:7 224:8 262:5  
**separately** 228:1  
**September** 12:21 114:3  
**series** 25:19  
**seriously** 35:21 131:5  
133:20 143:11 259:15  
260:14  
**serve** 7:17 14:21 21:12  
21:20 48:7 99:10  
104:21 118:13 129:20  
186:14 231:1 233:17  
237:20 238:12 243:4

**served** 15:3,13,21  
31:14 105:19 119:13  
123:16 128:11 235:12  
**serves** 15:17 240:2  
255:22  
**service** 5:17 15:1 19:2  
28:20 29:4 189:2,4  
224:5  
**services** 18:20 31:13  
109:1,2 180:3 184:6  
**serving** 16:3 19:8 20:16  
105:14 128:17 182:6  
231:4 237:13 244:12  
**session** 34:22 139:3  
174:12  
**sessions** 35:1 254:1  
**set** 16:10 75:6 79:4  
87:14 159:1 184:22  
**sets** 5:13  
**settings** 110:6 237:1  
**settled** 218:4,12  
**seven** 15:13,18 112:4  
141:22  
**severe** 251:12  
**severity** 263:2,7  
**shaking** 193:7  
**Shane** 2:10 15:16 42:18  
**shape** 93:2  
**share** 38:2 65:4 108:1  
141:9 181:7 186:17  
**shared** 37:4 200:3  
**sharing** 136:3  
**sheet** 68:17  
**shell** 212:11  
**shepherd** 69:22  
**Sherin** 3:14 232:9,13  
**shining** 141:1  
**ship** 125:8  
**Shireman** 1:18 8:15,15  
81:18 89:5 95:18  
98:16,19 101:18  
102:18 103:8,21  
117:1 118:16 119:18  
125:19 126:22 131:6  
133:4,17 137:5 138:2  
138:5,9 158:2 159:13  
160:12 165:8 167:22  
168:12 170:6,11  
172:8 173:13,15  
174:11,21 175:3  
215:7 220:15 223:3  
239:16 250:13 253:11  
254:15 255:17 256:15  
258:19 260:2 269:2,4  
269:17 271:5 273:17  
**short** 66:21 93:6 95:1  
217:20  
**shortcoming** 138:21

139:8  
**shortly** 167:13 191:6  
**shot** 101:21  
**show** 25:10 70:6,14  
72:16 150:2 162:18  
**show-cause** 23:19  
243:16  
**showed** 78:1  
**showing** 183:6 204:18  
**shown** 59:15 141:7  
**shows** 40:11 159:19  
163:1  
**side** 67:7 195:19 196:14  
237:18 254:7  
**Sierra** 78:19,20 85:10  
85:10 96:18 213:4,4  
**sign** 19:5  
**signal** 94:12  
**signals** 269:5  
**signed** 259:7  
**significance** 229:12  
**significant** 20:8 25:15  
112:9 144:15  
**silly** 89:10  
**similar** 26:22 210:4  
228:17  
**Simms-Coates** 2:6  
97:13,14 177:4,8,13  
177:19 178:1 180:17  
189:7 218:17  
**simple** 147:10 263:12  
**simplify** 244:22  
**simply** 83:13 103:14,18  
240:16  
**Sims-Coates** 175:9  
216:22  
**Simultaneous** 168:16  
170:17 211:20 213:3  
221:1 222:6 228:8  
**sincere** 16:5  
**single** 113:12 228:15  
235:21 238:18 239:4  
**sister** 254:3  
**sit** 198:16 247:19  
**site** 12:21 136:6 178:20  
225:15,17 227:3,11  
228:2 229:18,21  
230:2,8,15 231:2  
232:21 234:22 236:15  
237:17,21 238:14,15  
238:20,22 239:4  
240:4,11,11,18  
241:11 242:20 250:3  
256:5 258:4 263:20  
264:3,6,8  
**sites** 68:11,12,16,18  
**sitting** 249:5  
**situation** 37:9 38:7 73:3

102:8 141:13 150:14  
152:15 155:13 159:16  
240:14 251:6  
**six** 20:4 49:8 110:2  
142:3,6 246:8 263:9  
**size** 21:16  
**sized** 211:9  
**skill** 237:10  
**skills** 29:4  
**skipped** 202:19  
**sleazy** 257:16  
**slide** 177:20  
**slip** 244:6  
**small** 21:14,19 24:9  
41:9,16 42:1 44:3  
46:5 184:1 188:13  
200:17 206:15  
**Smith** 1:18 2:1 5:3,8 9:5  
9:5 92:3,9,15 95:20  
96:16 143:19 146:13  
147:19 148:1,9,14,21  
161:22 170:9,15  
172:11 177:12,16  
220:17 221:5,17  
222:1,9 271:9 272:4  
273:6,11,21 274:7  
275:9 276:8  
**soaring** 133:15  
**society** 107:20 182:6  
**software** 35:11  
**solution** 125:13  
**solutions** 153:13  
**solve** 94:12 151:11  
**somebody** 45:13  
104:10 122:12 177:11  
191:16 231:6 240:2,3  
**somewhat** 232:5  
**soon** 143:7  
**Soren** 96:19 167:11  
**sorry** 9:1 12:1,14 31:1  
39:2 63:13 64:14  
67:20 78:20 87:8 98:5  
98:6 130:13 167:6  
177:19 211:18  
**sort** 41:17,22 45:9 69:4  
69:5 84:4 88:2,7  
94:19 126:9 231:7  
**sorts** 153:12 257:3  
**sound** 52:15 214:21  
**sounded** 143:22 203:19  
**sounds** 43:4 47:15  
72:12 86:17 152:1  
203:17 218:11 267:11  
**sources** 128:16  
**South** 8:6,10  
**Southern** 8:13  
**space** 204:2 244:2  
**spans** 149:6

<b>speak</b> 14:19 37:9 52:12 52:19 94:16 104:19 181:21 216:17 229:17 230:19	126:20 127:3 129:10 130:4 138:17 139:4,9 143:21 157:16 158:20 159:10 162:13 175:9 177:1 178:5 179:17 179:19 186:21 187:11 189:7 199:16,16 213:6 214:1,2 218:16 223:3 225:6,11 226:7 226:17 229:9 231:16 233:10 238:5 243:10 267:21	258:1 263:2,15 <b>standby</b> 221:9 <b>standing</b> 221:6 252:18 <b>standpoint</b> 134:15 213:9 <b>stands</b> 62:12 72:17 268:22 <b>start</b> 7:10 9:17 37:15 49:15 106:13 117:10 121:6 153:14 159:12 172:19 173:12 239:17 244:11 270:2 271:19 274:6 <b>started</b> 118:10 199:14 199:15,21 202:21 <b>starting</b> 132:8 <b>state</b> 5:19,21 9:3 39:8,9 39:11,18 68:1,10,14 68:18 103:5 115:1 117:17 118:18 147:17 147:20,21 148:3,17 202:6 220:21 241:2 244:16 248:4,4,20 264:21 <b>stated</b> 13:15 92:8 114:5 114:15 183:13 236:11 <b>statement</b> 113:19 114:17,19,22 115:3,7 115:17 148:11 209:11 216:4 239:13 257:8,9 <b>statements</b> 181:8 209:10 <b>states</b> 2:18 4:13 11:5 20:3 98:12 99:4 107:4 173:4 175:5,11,13 178:3 180:19 181:6 181:11 182:8 188:17 189:10 190:22 191:4 195:13 198:3 204:13 207:17,19 208:5,11 208:18,22 211:15 214:3,17 219:4 235:18 <b>stating</b> 73:11 258:11 <b>statistics</b> 108:1 131:21 132:9 206:7 <b>status</b> 13:21 23:12,13 23:20,21,22 25:8,11 28:11 32:15 38:8,22 39:3 59:13 69:20 111:9,22 112:2,7,8 115:15 148:18 184:3 188:11 223:19 238:21 245:9,11 246:8 258:13 263:4 265:12 265:16 <b>statuses</b> 244:19,19,21 245:12,17 246:14	261:6 <b>statute</b> 78:15 <b>statutes</b> 168:20 <b>stayed</b> 137:14 <b>staying</b> 49:3 189:21 <b>steady</b> 42:1 <b>Stein</b> 2:6 97:17,17 223:4 224:18,19 227:6,17 229:10 232:4 233:11 267:15 267:22 268:13 <b>step</b> 32:12 <b>step-wise</b> 125:7 <b>Stephanie</b> 2:5 97:5,7 <b>steps</b> 87:22 141:2 <b>Steve</b> 8:21,22 9:1 95:21 <b>Steven</b> 1:19 172:15 220:18 271:11 <b>stipulate</b> 237:15 <b>stomach</b> 179:22 <b>stops</b> 250:19 <b>straight</b> 89:22 92:11,13 <b>strategies</b> 186:4,17 187:4 <b>strength</b> 260:17 <b>strengthen</b> 235:13 265:21 <b>strike</b> 139:5 269:9 <b>strip</b> 191:7 <b>strong</b> 204:12 257:9 <b>strongly</b> 42:15 <b>structure</b> 117:11,21,22 118:3 218:7 267:6 <b>struggle</b> 67:9 <b>struggling</b> 49:20 150:4 150:4 153:8 154:10 <b>students</b> 19:22 20:6,17 20:18,19 21:13,14,16 21:18 22:11 31:16 41:14 42:4 46:4,6,8 47:7 48:14,19 49:1,15 49:20 50:3,21 108:4 108:21 112:14 121:20 135:3,6,13 141:3,5,11 142:17 143:10 149:8 151:3,21 152:4,8,18 154:4,6,11,13,14 155:5,15 156:13 157:3 163:15 207:9 234:19 235:22 236:22 254:6,10 256:18 266:4,7 271:14 <b>students'</b> 149:7 157:4 <b>studies</b> 19:21 <b>study</b> 48:20 111:7 238:1 <b>subcommittee</b> 32:7 74:12 89:16 269:18
---	---	--	--

**subject** 100:8 178:8  
 226:10 241:18 272:8  
**submission** 13:4 100:8  
 178:9 217:1,7  
**submit** 30:19 75:19  
 144:1 186:10 187:18  
 225:12 265:9  
**submitted** 12:6 65:15  
 114:3,11,16 115:16  
 146:6 191:8 217:13  
 219:5  
**submitting** 137:7  
**subsequent** 145:22  
**subsequently** 146:21  
**substantial** 32:16 33:9  
 35:11 58:8 59:10,12  
 60:21 73:8 225:4  
 229:13  
**substantially** 54:8  
 55:17 57:13 79:2 88:5  
 89:2 92:10 93:17  
**substantive** 15:20 24:1  
 27:5 32:20 42:8  
 147:12 184:12 268:4  
**success** 31:15 87:20  
 155:7,16,21 156:12  
 156:21 157:5 181:21  
 185:7 188:5  
**successful** 122:3  
 141:20  
**succinct** 263:11  
**sudden** 240:5  
**sufficient** 38:12 59:15  
**suggest** 83:4 89:19  
 172:20 174:3 268:19  
 271:20  
**suggested** 82:13  
**suggesting** 163:7  
 243:20 264:19 267:4  
**SULLIVAN** 1:12  
**summaries** 101:3,6  
 103:1  
**summarize** 111:2  
**summarizing** 113:19  
 114:17,19 115:17  
 129:11  
**summary** 99:19 103:6  
 103:15 144:7 145:2,4  
 146:20 147:12 224:20  
**summer** 7:5  
**supply** 231:3  
**support** 16:7 17:20  
 26:11 27:11 31:13  
 34:1 36:15 41:8 51:22  
 84:13 93:2 110:1  
 162:1,11 164:1  
 169:22 185:7 188:21  
 189:9 212:14 251:14

271:10  
**supported** 42:15,16  
 96:17 109:19  
**supporting** 12:18 13:5  
 16:13 24:11 100:18  
 106:18 107:1 178:18  
 185:20 188:18 225:19  
**suppose** 89:18  
**supposed** 99:14 273:22  
**surely** 273:16  
**surfaces** 32:20  
**surfacing** 44:2  
**surplus** 197:4 214:18  
**surprise** 43:19,22,22  
**surprised** 149:12  
 214:19  
**survey** 35:2 255:2,22  
 256:3  
**surveys** 112:19 253:11  
**suspect** 41:6 254:15  
**suspected** 253:20  
**suspended** 43:13  
**sustain** 31:10,19  
**sweating** 217:21  
**swift** 235:8  
**switch** 272:15  
**system** 7:13 53:19,20  
 61:15 107:21 109:6  
 144:2 146:19 147:2,9  
**systematic** 112:12

## T

**table** 86:15 253:13  
 255:17  
**tail** 149:19,21 150:8,16  
 152:12,21  
**taken** 24:20 26:22  
 35:20 67:6 76:15 88:7  
 111:4,15 120:8  
 126:15,17 141:3  
 144:19 145:8,21  
 184:7 211:14  
**takes** 54:22 73:19 84:11  
 123:12 125:16 186:12  
 233:15  
**Talbot** 2:21 180:11,16  
 181:14  
**Talbot's** 194:13  
**talented** 109:20  
**talk** 59:22 120:22 123:2  
 124:16 127:11,12  
 158:2 195:20 199:4  
 200:22 204:4 216:14  
 258:1  
**talked** 117:13 139:21  
 142:9 229:20 230:4  
**talking** 63:1 91:9 144:6  
 230:10 255:8 261:4

**talks** 256:16  
**tardiness** 98:7  
**target** 152:17  
**tax** 250:21  
**Taylor** 48:8  
**teach** 68:2,9 69:9,15,18  
 70:2,4,7,13 265:8,9  
 265:12,18,21 266:1,5  
 266:9,13,18 267:2,13  
 267:19 268:5  
**teach-out** 144:12  
**teaching** 56:5  
**team** 14:15 17:20 18:1  
 18:12 19:5,8 24:18  
 28:10 30:11,14 54:2,2  
 54:9 57:11 58:14 62:7  
 62:11 96:15,16 104:5  
 127:12 128:20 136:6  
 189:8 191:9 201:10  
 201:12 202:10 225:17  
 227:11 228:2 229:21  
 230:2,15 231:2,3  
 232:21 236:15 238:9  
 238:22 242:8,12  
 250:3 256:5 260:20  
 264:6,8 269:20  
**teams** 29:8,22 78:2  
 227:3 229:19 236:15  
 264:3  
**technical** 8:6 175:20  
 190:2 195:17 196:13  
 201:20 214:13  
**technically** 266:12  
**technician** 107:22  
**technological** 35:8  
 51:18,21  
**technology** 175:22  
 176:5 184:20 223:16  
 248:20  
**telephone** 135:13  
**tell** 39:20 158:3 190:10  
 190:16 194:16 195:2  
 195:16 204:7 207:12  
 252:5  
**Telling** 64:12  
**tells** 82:1  
**template** 62:7 185:14  
**ten** 22:12 53:22 55:2,15  
 66:22 109:12  
**ten-year** 55:5 56:9  
**tend** 150:21 203:22  
 204:10 240:1  
**tended** 119:3,4  
**Tennessee** 7:20 15:12  
**tenure** 105:14 110:14  
 190:17  
**term** 15:4 45:18 103:5  
 103:19 261:9 262:3,4

262:7  
**terms** 74:1 81:8 88:19  
 126:14,17 127:21  
 129:20 130:6 132:11  
 141:10,17 183:12  
 231:19 253:17 262:6  
**terrible** 89:8 122:14  
**territories** 11:5  
**territory** 20:4  
**test** 149:10  
**test-takers** 142:19  
**testing** 123:13  
**tests** 84:4  
**Texas** 191:21  
**thanks** 48:4 70:15 76:7  
 79:13 81:14 119:18  
 139:19 198:18 239:18  
**theirs** 164:12  
**themes** 236:19 238:16  
**theological** 19:21  
**Theology** 15:11  
**therapy** 223:17  
**thereof** 263:3 265:11  
**They'd** 151:22  
**things** 49:7 60:4 74:11  
 74:20 121:1,14  
 122:10 124:18 126:14  
 126:16 128:12 130:1  
 134:22 141:10,12  
 145:18 150:20,22  
 157:5 161:2 163:18  
 164:5 214:10 216:7  
 256:7 257:3,16 258:3  
 258:17 262:18 265:4  
**third** 15:14 31:16 70:17  
 101:13 237:12 244:15  
 250:9  
**third-** 10:2  
**third-party** 10:6,8 11:14  
 157:12 179:12 268:16  
 272:9,12 273:13,18  
 275:15  
**thoroughness** 47:14  
**thought** 69:12 72:22  
 85:11 90:8 103:10  
 138:7 147:2 167:5  
 202:8 218:9  
**thoughts** 229:8 269:2  
**threat** 275:10  
**three** 9:14 18:4,14 20:9  
 20:10 23:16 26:15  
 35:1 37:16 49:6 53:2  
 57:15 68:12 69:14  
 75:22 124:10,11,14  
 127:7 129:10 141:21  
 142:5,8,10,18,21  
 149:20 175:13 178:19  
 200:22 225:20 228:16

228:22 231:4 240:12  
242:5,6 265:20  
**threshold** 22:15 24:18  
123:19 124:5 142:1  
186:9 188:2  
**thresholds** 123:20  
126:13 140:20 185:1  
**thrilled** 202:9  
**thrive** 24:14  
**thumbs** 92:18  
**tie** 85:9  
**tied** 60:20  
**ties** 252:19  
**tight** 39:21 154:12  
**tightened** 163:19  
**time's** 91:4  
**timeframe** 246:4  
**timeline** 39:20  
**timely** 114:6 115:16  
135:17  
**times** 124:1,14 136:12  
141:1,21 142:18  
152:2 162:19,22  
217:6 272:7  
**tireless** 189:9  
**Titel** 176:21 181:22  
190:5  
**Title** 6:14 12:8 20:15  
21:3,7 34:6 45:2,5,8  
45:12 99:10 108:13  
183:21 184:4 188:14  
190:4 195:18 206:2  
216:6 223:7 224:4,9  
255:12 268:4  
**today** 14:7 15:8 94:15  
96:17 97:3 100:3  
110:11 172:21 173:3  
179:15 180:14,18,22  
181:13,21 201:19  
209:1,13 210:9  
214:20 222:20 233:9  
273:15 274:8  
**toes** 136:14  
**tomorrow** 271:16,20  
272:14 273:3,9 274:1  
274:13 276:2,4,5,11  
276:15  
**ton** 73:22  
**tons** 121:21  
**Tooks** 3:14 232:9,12,13  
233:6 241:2,4,22  
244:10 247:12 249:21  
252:8 253:20 255:14  
255:20 257:20 259:5  
261:13,17 263:1  
264:1 265:15  
**tool** 33:14  
**tools** 186:14

**top** 66:13 213:10  
249:17,22 264:22  
265:7 267:8  
**topic** 89:7,15  
**topics** 243:8  
**total** 20:16,18,19 44:1  
209:11 253:15  
**totaled** 26:1  
**totaling** 109:8  
**totally** 93:3 127:5  
173:18 208:8 250:16  
**touch** 274:7  
**touched** 87:4  
**track** 120:11 121:1  
133:2 164:13 253:19  
254:17  
**tracking** 46:21 89:11  
109:5  
**tracks** 26:4,8 254:2  
**train** 62:17  
**trained** 54:9 57:11  
58:17,18  
**training** 12:20 18:2,3,6  
18:9 19:1 25:15 26:3  
26:10,13,18 58:14  
60:1,5,7,13 61:15  
107:1,22 162:5  
175:20  
**transcript** 82:22  
**transfer** 21:13 22:16  
29:5 44:6,15 46:11  
47:16  
**transfers** 195:1  
**transformation** 51:6  
**transition** 113:5 216:16  
**transitioning** 85:2  
**transmittal** 245:19  
**transparency** 147:8  
**transparent** 172:13  
216:21  
**travel** 198:5,6  
**treat** 39:14 265:10  
**treated** 133:20  
**treats** 33:5  
**tremendous** 98:10  
260:17  
**tremendously** 105:6  
**Tri-County** 8:6  
**tried** 217:6  
**trigger** 267:12  
**triggers** 44:12 81:20  
265:4,14  
**tripped** 32:5  
**trouble** 132:12 143:9  
**troubled** 141:13  
**true** 149:14 153:11  
**truly** 229:3  
**trust** 26:14 182:8

**trusted** 182:10  
**truth** 84:22  
**try** 47:20 52:18 61:4,9  
83:17 121:19 125:8  
151:13 196:5 212:22  
257:16  
**trying** 62:17 73:12  
76:21 84:21 86:2,12  
93:1 102:6 145:1  
147:9,11 263:11  
274:22  
**tuition** 24:12 119:21  
**Tunnel** 176:13  
**turn** 7:1 23:10 52:14  
58:15 59:21 104:8,8  
104:14 106:8 110:16  
175:9 177:6 193:10  
232:18  
**turned** 215:15  
**Turning** 30:22  
**turns** 128:4  
**twenty** 106:3  
**two** 15:4,15 22:21 23:17  
23:19 24:5 26:19  
27:16 28:14 30:3,5  
39:5,11 41:2 53:7  
54:18 63:21 64:14  
69:14 70:13 74:20  
75:19,20 77:8 112:1,5  
120:13 123:11 124:1  
129:9 133:18 140:1  
141:21 149:13 153:16  
172:21 179:1 191:21  
195:2 202:15 208:8  
210:2 212:10 213:22  
216:12 230:3 231:21  
232:1 237:13 241:13  
241:18 242:7,7,14  
243:11 248:18 249:3  
255:6 262:5 265:16  
265:20 268:17  
**two-day** 28:2  
**twofold** 255:16  
**type** 73:3 240:17  
**types** 84:9 127:8 164:5  
265:14  
**typical** 49:17  
**typically** 142:3 164:6  
246:8 263:9

---

**U**

---

**U.S** 1:1 20:3,3 106:15  
107:5 108:22 110:4  
132:9 176:8 189:2  
**ultimately** 62:2  
**umbrella** 208:4  
**unable** 233:9  
**unclear** 230:17

**undergraduate** 10:21  
13:22 56:22  
**undergraduates** 20:17  
21:4 157:3  
**underserved** 20:13  
**understand** 37:21  
73:20 80:9 81:1 86:2  
92:4 129:3 143:3  
144:12 146:13 153:6  
161:19 162:5,9  
164:11 198:14 226:19  
230:10  
**understandable** 132:7  
**Understandably** 54:19  
**Understanding** 81:2  
120:13 144:18 227:7  
227:8 228:6 261:7  
**understood** 222:2  
**underway** 84:22  
**uneasiness** 198:14  
**unexpected** 42:13  
**unfortunately** 167:12  
190:7  
**unique** 44:19 182:7  
232:5  
**unit** 27:22  
**United** 11:4 98:12 99:4  
107:4 182:8 191:4  
195:13  
**universities** 7:21 8:20  
19:20  
**university** 2:15 7:12 8:3  
37:21 48:8 105:2  
129:15 135:9 137:14  
137:17 138:4  
**unreasonable** 163:19  
**unsure** 237:12  
**unusual** 58:1  
**update** 37:4 112:9  
185:13 202:11,11  
**updated** 18:3 64:1,2  
115:6,10 201:5,12  
202:6 262:15  
**updates** 18:8 25:2 35:6  
**upped** 154:1  
**USC** 5:18  
**USDA** 233:10 235:16  
236:4,5  
**use** 5:14 59:11 61:21  
67:15 78:15 91:20  
112:12 168:21 176:20  
204:10 205:5 242:10  
243:12,14 246:6  
254:20 256:3 257:19  
262:3  
**useful** 256:20  
**user** 134:15 237:3  
**user-friendly** 185:15

**uses** 182:18 261:9  
**usual** 141:14,16 155:3  
**usually** 142:6  
**utilize** 195:18 208:13  
 256:13

# V

**validated** 54:17  
**validation** 27:18  
**valuable** 256:8  
**value** 131:4 237:19  
**valued** 35:5 105:6  
 253:10  
**values** 235:20 252:9  
**Van** 1:19 9:1,1 95:22  
**variability** 263:13  
**variable** 254:19  
**varied** 238:2  
**variety** 121:8  
**various** 6:6 41:6 123:14  
 124:2 128:10 156:20  
 215:10 234:16  
**vary** 31:5  
**vast** 135:2  
**verify** 104:10  
**version** 134:20  
**versus** 77:2 132:6  
 203:21 204:5 249:15  
 250:16 261:21  
**vetting** 204:12  
**viability** 187:17  
**viable** 204:16  
**vice** 1:12 2:19,20,21  
 3:13 7:19,21 15:2,10  
 79:13 81:7 90:7,16  
 95:16 163:22 167:3,7  
 167:17 172:6 181:1,3  
 181:15,16 189:14  
 190:1 193:1 198:17  
 202:14 203:7,11,17  
 204:20 206:6 211:21  
 212:4 216:3 217:21  
 219:1 220:13 232:16  
 233:4 271:3  
**Videoconference** 1:9  
**view** 44:13 46:22 105:5  
 229:6 263:3  
**viewed** 177:14  
**viewpoint** 130:19  
**violate** 251:7  
**Virgin** 176:8 191:15  
 195:13  
**Virginia** 191:21  
**virtual** 12:18 35:1  
 100:19 178:19 225:20  
**Visa** 48:18 49:22 50:4  
**visit** 27:8 30:11 32:19  
 33:1,1,7 38:20,22

65:10,11,13 178:20  
 225:15,17 227:11  
 229:19,21 230:2,15  
 232:21 236:15 250:3  
 256:5 258:4 264:3,6,8  
**visitation** 250:2  
**visited** 138:4  
**visiting** 201:10,12  
 227:3  
**visitor** 240:11,11  
**visitors** 230:8 237:21  
 238:20 239:4 240:18  
 241:11 242:20  
**visits** 12:22 17:17,19,19  
 17:20,21 25:4 27:3,5  
 28:6 33:13 234:22  
 238:14,15 263:20  
**vocational** 175:17,20  
**voice** 19:15 77:1  
**volume** 21:7,8 183:17  
**volumes** 253:14  
**voluntarily** 261:21  
**voluntary** 261:8,10  
**volunteer** 18:13 105:20  
 109:15  
**vote** 10:9 85:1 87:7  
 90:3,5,9,10,11,17,19  
 90:21 91:6 93:5,6  
 95:3 161:4 164:15  
 166:5 169:17 170:2  
 170:10 173:20 174:5  
 174:10 219:12 270:1  
**voted** 83:8 93:9 168:6  
**votes** 91:15 170:13  
 213:14  
**voting** 91:20 92:17  
 94:21 161:18 166:3  
 169:7 174:13

# W

**W** 7:11 43:7 45:15 47:4  
 48:4 76:7 77:7 78:8  
 91:13 93:22 94:5  
 139:18 166:13 171:14  
 212:8 219:21 270:11  
 275:18  
**wage** 164:8  
**wait** 82:17 229:2  
**waiting** 151:9 222:18  
**walk** 60:19 61:1 135:10  
 147:17 199:11  
**walkthrough** 60:14  
**wall** 137:16  
**Walla** 9:2,2  
**WALLACE** 1:14  
**Wally** 7:10,11 43:5,6  
 52:6 76:6 77:4 78:6  
 91:12 93:21 94:6

139:16,17 166:12  
 171:13 212:1,7 215:6  
 219:20 270:10 274:10  
 275:17  
**wanted** 43:3 45:13  
 67:21 74:10 75:13  
 77:19 78:22 117:10  
 118:5 149:19 173:19  
 174:14 221:6 222:1  
 247:1 260:22 267:22  
 272:16 275:18,21  
**wanting** 81:2 244:3  
**wants** 85:16 124:21  
**warning** 22:9 25:10  
 57:19 70:12,13  
**warnings** 66:12  
**Washington** 9:3  
**wasn't** 53:21 77:21  
 85:12 122:13 156:7  
 194:4 229:22 240:18  
 255:8  
**watch** 152:9  
**watches** 272:19  
**watching** 272:19  
**waters** 169:13  
**way** 82:19 85:6 88:12  
 88:21 90:6 92:17  
 120:5 128:14 131:9  
 149:9 154:20 161:20  
 170:14 174:7,8 192:1  
 204:7 214:4 227:15  
 243:12,17 250:17  
 256:22 261:1 262:11  
 267:6 269:7 273:1,21  
 275:21 276:2  
**ways** 42:3 43:15 50:18  
 194:17  
**weak** 61:8,9  
**weaker** 155:6,15  
**weakness** 26:21 32:14  
 32:20 58:11 267:9  
**wealth** 17:12  
**webinars** 34:3  
**website** 6:21 30:15  
 38:17 40:10 63:5,20  
 65:7,14,14,21 66:2,7  
 70:5 109:6 114:18  
 115:2,21 144:22  
 145:1,6,6,11 147:4,18  
 147:22 162:15 201:19  
 202:13 258:11 261:5  
**websites** 59:4 63:4  
**WEDNESDAY** 1:6  
**week** 37:13  
**weeks** 228:22  
**weigh** 199:2  
**Welch** 15:12  
**welcome** 4:2 5:3 7:4

96:11 104:4 170:19  
 170:19 173:11 212:2  
**welcoming** 180:18  
**went** 65:11 96:9 132:6  
 173:9 190:21 222:3  
 222:16 241:5 276:17  
**weren't** 55:12 170:13  
 240:17  
**wet** 180:22  
**whatnot** 147:8  
**whichever** 269:8  
**white** 199:19  
**willing** 251:6  
**window** 136:9,16  
 145:14  
**wire** 195:1  
**wish** 113:22  
**withdraw** 114:4 122:16  
 245:10 246:6 263:8  
 265:11 267:10,11  
**withdrawal** 145:22  
 172:14 231:22 243:15  
 244:2,8 245:5,15  
 261:6,7,9,16,21 262:8  
 263:10  
**withdrawals** 121:17  
**withdrawn** 112:5 144:9  
 144:11 148:16,19  
 265:17  
**withdrew** 25:11  
**wondered** 138:22  
 179:20 193:19 274:12  
**wondering** 37:8 40:13  
 40:18 44:12 193:21  
 212:19 250:5,8  
**Wood** 2:10 15:16 58:15  
 59:22 60:3 63:10  
**WOR** 65:5  
**word** 61:8 204:11  
**words** 28:12 47:4 160:6  
 182:9 249:1  
**work** 8:3 16:18 18:11  
 24:12 25:13 35:6  
 51:20 53:16 54:19  
 56:17 57:1 81:2 82:13  
 83:17 84:2,20,21 96:3  
 98:11 105:4 121:3  
 126:20 140:17 141:10  
 150:11 151:12 152:13  
 186:15 189:9 190:3  
 199:8 216:16 217:7  
**worked** 187:7 217:4  
**workforce** 49:4 109:4  
**working** 61:15 80:3  
 109:20 110:5 127:15  
 135:6,14 141:16  
 143:13 150:13 175:22  
 188:6 191:20 199:20



199:20 201:14  
**works** 205:5  
**workshop** 12:21 26:4,8  
**workshops** 27:19  
**world** 183:4 266:19  
**worse** 37:7  
**worthwhile** 169:15  
**wouldn't** 58:10 91:4  
 168:9 275:9  
**write** 129:11 194:19  
 258:10  
**writing** 195:21  
**written** 196:10 247:20  
 258:2,16 259:6  
**wrong** 89:8 146:3  
**wrote** 65:14

**X****Y**

**yank** 151:20 153:1  
**year** 15:14 16:21 22:4  
 22:14 23:18 24:3  
 39:19 60:15 66:22  
 73:7,9,21,22 74:5  
 88:19 121:13 124:11  
 124:14 136:9 141:6  
 141:22 142:5,18  
 145:8,20 185:17  
 193:14 194:2 196:9  
 215:3 228:19 229:2  
 238:10,15 241:20  
 244:12  
**years** 12:12 15:3,4,14  
 15:18,22 16:22 18:4  
 26:15 30:3 36:8 40:16  
 41:2 43:13 48:10 49:8  
 52:5 53:22 54:18 55:2  
 55:15 57:21 59:18  
 71:7 73:10 74:7 75:20  
 75:20 76:1 85:5 90:1  
 91:16,21 100:14  
 106:3,5 110:12,13  
 111:7 123:10,21  
 124:10,10 129:22  
 142:11,22 151:1  
 155:14 156:18 160:4  
 160:16 161:19 165:16  
 171:4 178:13 195:2  
 196:2 197:5 199:15  
 205:4,9,15 214:17  
 224:16 225:5 244:13  
 244:16 256:4 259:5  
 265:20 269:11  
**yesterday** 16:9 75:1  
 173:3  
**York** 39:9,18 68:10,14  
 68:18,22 176:6

**Z**

**Z** 9:5 92:3,9,15 95:20  
 143:19 146:13 147:19  
 148:1,9,14,21 161:22  
 170:9,15 172:11  
 177:16 220:17 271:9  
**Zakiya** 1:18 9:4,5 92:2  
 95:19 139:16 143:18  
 161:21 170:19 172:10  
 220:16 271:8  
**Zarembski** 2:16 106:4  
 110:12 142:2 148:15  
 153:14  
**zero** 134:22  
**Zimbabwe** 110:8  
**Zoom** 104:10

**0**

**0.3** 23:6

**1**

**1,158** 20:17  
**1.0** 22:21  
**1.1** 23:2  
**1.2** 23:1  
**1.5** 23:2 24:17  
**1.7** 23:1  
**1:00** 272:2 274:6  
**1:08** 172:18  
**1:09** 173:9  
**10** 4:6 140:7 205:8  
**10-** 117:13  
**10,000** 207:3,6,13  
**10:00** 1:9 5:2 271:19  
 273:10 274:4 276:2  
 276:14  
**100** 198:4 215:11  
 255:14  
**101(c)** 5:16  
**11** 32:18 34:13 137:22  
 256:16  
**11:41** 96:9  
**11:46** 96:5  
**11:49** 96:10  
**111** 20:3  
**113** 11:3  
**114** 5:10 6:8 99:3  
**11th** 68:6  
**12** 100:9 178:9 184:20  
 193:11 194:5 200:18  
 201:7 205:8 219:6  
 225:12 226:12 255:17  
**12-month** 225:16  
**125,000** 140:15  
**128** 20:19  
**128,000.00** 132:10  
**13** 11:3 109:20 111:21  
 200:17,18

**13800** 108:5  
**14** 140:8  
**140** 108:2 140:5  
**1400** 223:21  
**15** 18:13 195:6 205:14  
 207:5  
**15,000** 21:11  
**150** 21:22 22:5  
**150,000** 195:5 207:5  
**15A4** 235:17 239:6  
**16** 99:3  
**17** 20:4 23:13 235:1  
 252:12  
**170** 246:21  
**170,000** 140:14  
**173,500.00** 132:4  
**175** 4:14  
**18** 18:12 23:14 246:4  
**19** 183:22 184:3  
**1900** 182:1  
**1932** 118:10  
**1952** 11:10 16:22 107:6  
 117:21 224:12 234:1  
**1954** 6:20  
**1965** 5:11  
**1st** 113:4,11 180:21

**2**

**2** 24:8  
**2.5** 23:7 149:18  
**2:00** 173:2,7  
**2:03** 173:10  
**20** 1:6 20:18 44:1  
 110:11 195:7 244:16  
**200** 18:1 41:13  
**2007** 50:15  
**2012** 195:5 224:13  
**2013** 224:15  
**2015** 113:4  
**2016** 113:5 254:11  
**2016-2017** 48:19  
**2017** 11:11 23:11 109:8  
 111:4,4 183:16  
 224:15  
**2018** 193:20  
**2019** 38:6 105:12  
 193:12,17,20 194:17  
 209:14  
**2019-20** 22:3  
**2020** 23:1,2,6 38:9 55:6  
 58:22 64:1 114:3,5  
 193:21 194:2 198:9  
**2020-2021** 22:3  
**2021** 12:20,21,22 22:17  
 23:1,3,6 25:22 28:2  
 38:13,14,18 39:3  
 108:3 113:6 132:2,10  
 193:22 198:10 225:22

226:1 254:10  
**2021's** 194:2  
**2022** 1:6 7:5 12:20,22  
 13:2 22:9 30:8 33:10  
 34:21 35:10 39:7,21  
 40:2 59:3 64:22  
 100:20 108:6 115:14  
 226:2  
**2024** 113:10  
**2025** 113:10,11  
**2030** 55:16  
**20th** 244:11  
**21** 253:14  
**22** 106:5 110:13 114:12  
 223:22  
**224** 4:18  
**23** 109:9  
**230** 109:8  
**24-month** 246:4  
**241** 24:1  
**25** 32:17 44:21 67:11  
 156:15 197:1  
**26** 86:21  
**26E** 158:9,14  
**27** 86:21 176:20  
**28** 26:16  
**29** 15:3

**3**

**3** 132:13 140:5  
**3:00** 221:2  
**3:01** 222:16  
**3:06** 222:14  
**3:07** 222:17  
**30** 167:14  
**30-day** 136:16  
**30-plus** 190:8  
**300** 24:2  
**313** 111:15  
**32** 21:5 184:2 189:17  
**33** 22:6,15 252:15  
**354,000** 198:1  
**36** 20:3 45:1  
**39** 45:4

**4**

**4** 176:13  
**4:07** 276:17  
**40** 20:21  
**40,000** 20:6  
**42** 5:18 21:8  
**47** 183:20,22  
**48** 28:3  
**487(c-4)** 5:16  
**4966** 5:18

**5**

**5** 4:2

**5-year** 129:20  
**50** 17:21 68:13  
**51** 23:15 26:2  
**53** 20:16,21 21:2,10  
 41:10  
**53000** 108:4  
**54** 21:4  
**56** 109:9  
**58** 176:17

---

**6**


---

**6,747** 20:17  
**60** 101:4 113:18 114:16  
 115:4,9 205:12  
**60-day** 145:12,14  
**60.8** 22:17 44:14 45:22  
**601** 21:17 46:5  
**602** 86:21 158:8,13  
 235:17  
**602.10** 108:16  
**602.16** 88:16 161:6  
**602.16(d)** 13:18  
**602.17** 88:14  
**602.21C** 179:7  
**602.21D3** 179:8  
**602.26E** 101:2 113:15  
 116:5  
**602.35(c)** 75:2  
**602.A4** 236:2  
**60216** 85:13  
**60217** 85:14  
**60221B4** 179:1  
**60234G** 78:22  
**631** 239:6  
**69** 183:19  
**6b** 24:7

---

**7**


---

**7** 176:19  
**7,905** 20:18  
**70** 185:2 204:21,22  
 205:1,6,11,16,16,17  
**707070** 205:15  
**73** 111:7  
**75th** 16:21

---

**8**


---

**80** 56:21 57:4,8  
**8016** 5:17  
**85** 238:14  
**88** 111:5 238:14

---

**9**


---

**9** 200:21 246:21  
**9.4** 57:4  
**9:00** 276:11  
**91** 26:1  
**94** 238:13

**95** 238:14  
**98** 4:10

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