

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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THURSDAY
JULY 21, 2022

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The Advisory Committee met via
Videoconference, at 10:00 a.m. EDT, 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
ANTOINETTE FLORES
NICOLE S. HARRIS
CHARITY HELTON
DONNA MANGOLD
STEPHANIE McKISSIC
KARMON SIMMS-COATES
MICHAEL STEIN

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS,
COMMISSION ON COLLEGES (SACSCOC)
ROSALIND FUSE-HALL, Director
REBECCA MALONEY, Chair, Board of Trustees
ALEXI MATVEEV, Director
BELLE S. WHEELAN, President

THIRD PARTY COMMENTERS

ROBERT J. BOYD, ESQ., Independent Colleges and
Universities of Florida
ANGEL CABRERA, Georgia Institute of Technology
EDWARD CONROY, New America
TESSA EMBRY
RACHEL FISHMAN, New America
BERNARD FRYSHMAN, Association of Advanced
Rabbinical and Talmudic Schools
DAVID HALPERIN, Attorney

JAMES HAYNES, Veterans Education Success

MARK LINDSAY, The Livingston Group

VANN R. NEWKIRK, Fisk University

KYLE SOUTHERN, The Institute for College Access
and Success

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Welcome and Introductions. 4

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Renewal of Recognition:
Southern Association of Colleges and Schools,
Commission on Colleges (SACSCOC) 107

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

2 10:00 a.m.

3 CHAIR KEISER: Good morning, everyone.

4 This is day three of the National Advisory
5 Committee on Institutional Quality and Integrity.

6 Today is probably the last day of our
7 meeting, as we were able to move up some of the
8 agencies.

9 So, I'd like to introduce -- well,
10 George, you should be doing the introduction, not
11 me.

12 G.A. SMITH: Well, I mean, I can do my
13 typical opening statement. So, just let me do
14 that for the record, okay?

15 CHAIR KEISER: Go ahead, I'm sorry.

16 G.A. SMITH: All right. Welcome
17 everyone. It's our judgment, and this is the
18 meeting of the National Advisory Committee on
19 Institutional Quality and Integrity, also known
20 as NACIQI.

21 I'm George Smith, the executive
22 director and designated official of NACIQI, which

1 was established by Section 114 of the Higher
2 Education Act of 1965, and is also governed by
3 provisions of the Federal Advisory Committee Act,
4 as amended, which sets forth standards for the
5 formation and use of advisory committees.

6 Sections 101C and 487C-4 of HEA, and
7 Section 8016 of the Public Health Service Act,
8 42 U.S.C. Section 2966, by the Secretary of
9 Published Lists of State Approval Agencies,
10 nationally recognized accrediting agencies, and
11 state approval and crediting agencies for
12 programs of nurse education that the secretary
13 determines to be reliable authorities as to the
14 quality of education provided by the institutions
15 and programs they accredit.

16 Eligibility of the educational
17 institutions and programs for participating in
18 various federal programs requires accreditation
19 by an agency listed by the Secretary.

20 As provided in HEA Section 114, NACIQI
21 advises the Secretary in the discharge of these
22 functions.

1 It's also authorized to provide advice
2 regarding the process of eligibility and
3 certification of institutions of higher education
4 for participation in the federal student need
5 programs, authorized under Title IV of the HEA.

6 In addition to these charges, NACIQI
7 authorizes academic graduate degrees from federal
8 agencies and institutions.

9 This authorization was provided by
10 letter from the Office of Management and Budget
11 in 1954. And the letter is available on the
12 NACIQI website, along with all other records
13 related to NACIQI's deliberations. So, now I'll
14 turn it back over to you, Art. And you can start
15 with introductions.

16 First thing on the agenda is to have
17 the introduction of the members of the Committee
18 and the members of the Staff. And if I may
19 have -- Wally, if you would introduce yourself?

20 W. BOSTON: Sure. Wally Boston,
21 president emeritus of American Public University
22 Systems.

1 CHAIR KEISER: Molly?

2 M. HALL-MARTIN: (Native language
3 spoken.) I'm Molly Hall Martin and I am a
4 student member.

5 CHAIR KEISER: Mary Ellen?

6 M.E. PETRISKO: Mary Ellen Petrisko,
7 past president of WASC Senior College and
8 University Commission.

9 CHAIR KEISER: Kathleen.

10 K.S. ALIOTO: Kathleen Sullivan
11 Alioto, advocate for early child care
12 certification, the first two years of life, where
13 80 percent of a child's brain is developed.

14 CHAIR KEISER: David.

15 D. EUBANKS: Good morning everyone.
16 Dave Eubanks, I work at Furman University.

17 CHAIR KEISER: Claude.

18 VICE CHAIR PRESSNELL: Good morning.
19 Claude Pressnell, president of the Tennessee
20 Independent Colleges and Universities, and Vice-
21 Chair of the Committee.

22 CHAIR KEISER: Robert.

1 R. MAYES: Good morning. Robert
2 Mayes, CEO of Columbia Southern Education Group.

3 CHAIR KEISER: Steven.

4 S. VAN AUSDLER: Good morning. Steve
5 Van Ausdler, President Emeritus, Walla Walla
6 Community College in Washington State.

7 CHAIR KEISER: Bob.

8 B. SHIREMAN: Bob Shireman, Director
9 of the Higher Education Program, and Senior
10 Fellow at the Century Foundation.

11 CHAIR KEISER: Jill.

12 J. DERBY: Good morning. I'm Jill
13 Derby, the senior fellow, Association of
14 Governing Boards of Universities and Colleges.

15 CHAIR KEISER: Roslyn.

16 R. ARTIS: Good morning. Roslyn
17 Artis, President of Benedict College in South
18 Carolina.

19 CHAIR KEISER: Zakiya.

20 Z. SMITH ELLIS: Good morning. Zakiya
21 Smith-Ellis, former chief policy advisor to
22 Governor Murphy in New Jersey, and student

1 advocate.

2 CHAIR KEISER: Jennifer.

3 J. BLUM: Jennifer Blum with Blum
4 Higher Education Advising.

5 CHAIR KEISER: George, if you would
6 introduce your team, and then Herman?

7 G.A. SMITH: Sure. Part of my team,
8 Monica Freeman, and we also have with us today
9 three representatives with OGC, Donna Mangold,
10 Angela Sierra, and Soren Lagaard.

11 H. BOUNDS: Good morning again. My
12 name is Herman Bounds, I'm the Director of The
13 Accreditation Group, and I'll introduce the AG
14 staff. So, Elizabeth Daggett and Reha Mallory
15 are out. We'll start with Nicole.

16 N. HARRIS: Yes, good morning.
17 Dr. Nicole S. Harris, Analyst with The
18 Accreditation Group. Good morning.

19 H. BOUNDS: Stephanie?

20 S. MCKISSIC: Good morning. I'm
21 Dr. Stephanie McKissic. I'm an accreditation
22 analyst with The Accreditation Group.

1 H. BOUNDS: Charity.

2 C. HELTON: Good morning. This is
3 Charity Helton, Accreditation Analyst with The
4 Accreditation Group.

5 H. BOUNDS: And Karmon.

6 K. SIMMS-COATES: Good morning. This
7 is Karmon Simms-Coates and I'm an analyst with
8 The Accreditation Group.

9 H. BOUNDS: Mike.

10 M. STEIN: Good morning. Mike Stein,
11 analyst with The Accreditation Group.

12 H. BOUNDS: LG.

13 L. CORDER: LG Corder, analyst with
14 The Accreditation Group.

15 H. BOUNDS: And Paul.

16 P. FLOREK: Paul Florek, analyst,
17 Accreditation Group.

18 H. BOUNDS: All right, Art, that's us.
19 We're all present and accounted for.

20 CHAIR KEISER: Thank you, Herman and
21 George. And again, thank you to the Staff.
22 You've done a remarkable job putting this

1 together, especially in the virtual environment.

2 For those who don't know, because we
3 were able to complete the review of the American
4 Dental Association's commission, yesterday we
5 were able to compress the meeting and begin today
6 with the policy discussion that was scheduled for
7 tomorrow.

8 Those folks who had whispered that
9 they wanted to testify have been notified, and I
10 am told that they are going to be available to be
11 able to talk to us.

12 But first, before we go to the policy
13 discussion, which I think this is still part of
14 the policy discussion, is we've established a
15 committee on the accreditation dashboards and
16 much of the data review.

17 And thank you very much, Wally, for
18 the hard work that you did. And I'd welcome the
19 report from the Committee and the discussion
20 there.

21 W. BOSTON: Thank you, Art. First of
22 all, I'd like to thank everyone who's

1 participated in the subcommittee activities.

2 And just as a refresher, at last
3 summer's meeting the dashboards were
4 reinstated, and a discussion was held among the
5 full Committee of a number of items that were on
6 the dashboards, which had been absent for a few
7 years.

8 At our February meeting, it was
9 suggested that we form a subcommittee of
10 interested members to follow up on how NACIQI
11 might best utilize the accreditor dashboards, as
12 well as to follow up on the specific discussion
13 items from the July 2021 meeting.

14 We've had four subcommittee meetings
15 since our February meeting. At our first
16 subcommittee meeting in March we were provided
17 with the original whitepaper recommending the
18 creation of an accreditor dashboard as a pilot
19 project for the June 2016 NACIQI meeting.

20 George Alan Smith provided the
21 subcommittee members with a perspective on the
22 origination of the dashboards, the utilization of

1 the dashboards, the suspension of the dashboards,
2 and the reinstatement of the dashboards. With
3 the dashboards reinstated, the pilot is assumed
4 to have been reactivated.

5 Herman Bounds provided us with a
6 review and discussion as to how his team uses the
7 dashboards, as well as other databases that are
8 not accessible to NACIQI.

9 It was noted at that review that the
10 department's reviewers have access to more
11 material than we do, due to privacy rules and
12 regulations that prevent certain data from being
13 distributed outside of the department itself.

14 At our first subcommittee meeting,
15 there was a consensus that we wanted to continue
16 to use the four foci originally singled out by
17 the original pilot project.

18 These four foci are: (1) general
19 performance and outcomes of the institutions the
20 agency accredits, (2) decision activities of, and
21 data gathered by, the agency, (3) standards and
22 practices with regard to student achievement,

1 (4) agency activities in improving program and
2 institutional quality.

3 We also agreed that the process of
4 gathering the dashboard data, processing it,
5 publishing the dashboards, and utilizing them, as
6 part of NACIQI's agency reviews, are important
7 items for our Committee members to understand and
8 discuss as well.

9 The subcommittee invited Brian Fu to
10 our second meeting. Brian and his team at the
11 department are responsible for the college
12 scorecard and the NACIQI dashboards.

13 We asked Brian if he could provide us
14 with his perspective about the data that's
15 included in the dashboards, which data is
16 excluded, and why.

17 We also asked Brian to inform us about
18 the process of data gathering for the dashboards,
19 and the feasibility of making changes that the
20 subcommittee might recommend.

21 At that meeting, we asked Brian if he
22 could provide us with a descriptive matrix of how

1 data related to graduate degrees could be
2 included in the current dashboards.

3 We also asked if the data on the
4 dashboards could include all completers, not just
5 those who borrow. We were told the data for all
6 completers could be included.

7 Lastly, we asked him if the dashboards
8 could be designed to flag changes from year-to-
9 year in certain metrics.

10 That change, we've been informed, is
11 feasible. We would just need to provide Brian
12 and the department with guidance as to which
13 metrics would be important to flag, as well as
14 the percentage change, up or down, that would
15 trigger a flagged notation.

16 During our review and discussion of
17 the current dashboards, it became evident that
18 the dashboards for specialty program accreditors
19 are not usable in its current format.

20 Bob Sharman volunteered to review the
21 various databases maintained by the department,
22 to determine if a prototype dashboard could be

1 built using program-specific data that is a
2 subset of the institutional data profiled on the
3 other dashboards.

4 He and his associates determined that
5 the DAPIP -- D-A-P-I-P -- dataset had much of the
6 data that we were seeking. One of Bob's
7 associates built several prototype dashboards
8 using this data.

9 A key finding during this process was
10 that the DAPIP database and the Federal Student
11 Aid -- FSA -- database are maintained separately.
12 CIP codes are maintained in the FSA database, but
13 not in the DAPIP database.

14 The contractor that maintains the
15 DAPIP database has said that adding that feature
16 to that database would be out of scope of the
17 current contract.

18 In addition, the contractor does not
19 want to assume responsibility for adding the CIP
20 codes to match the degree programs if the
21 contract was reopened to consider this.

22 It is the subcommittee's intention to

1 continue to follow up with Brian Fu regarding the
2 addition of graduate degree data to the existing
3 dashboards.

4 George Alan Smith has agreed to meet
5 with others at the department and find out if
6 it's feasible to transfer CIP data from the FSA
7 database to the SAP database, to facilitate the
8 development of a relevant dashboard for specialty
9 accreditors.

10 These are not the fullest of ideas,
11 nor have I expressed the list of hurdles that we
12 may have to leap over if it is deemed that some
13 of the data we would like to include on the
14 dashboards are not within our purview from a
15 regulatory perspective.

16 It is our intention to continue to
17 meet and present a whitepaper to the full
18 Committee at our February meeting.

19 If the recommendations are adopted by
20 the Committee, we will know which changes can be
21 added in time for the 2023 dashboard, and which
22 changes will have to wait until further approvals

1 can be obtained.

2 I'd like to thank everyone on the
3 subcommittee, and thank George Alan Smith, Herman
4 Bounds and Brian Fu for the collegial and
5 positive interactions with our Committee.

6 By the way, the 2022 dashboards are
7 now available for the Committee and the public's
8 review, if people have not looked at them. Thank
9 you. And I'm available for any questions.

10 CHAIR KEISER: Thank you, Wally.
11 There was a lot of work done and we appreciate
12 the efforts on behalf of NACIQI by the Committee.
13 Comments, questions, to Wally? Wow.

14 VICE CHAIR PRESSNELL: Yeah, I have a
15 question.

16 CHAIR KEISER: No worry. Then, Bob.
17 Okay.

18 VICE CHAIR PRESSNELL: Yeah, I just
19 have a question about the CIP codes. Bob, I know
20 you're working with the CIP codes. Refresh my
21 memory. Are CIP codes normally four-digit, and
22 then there's an expanded six-digit, and which

1 ones are we going after? How granular are we
2 going to look?

3 W. BOSTON: I agreed in advance to
4 yield those responses to Bob, who spent quite a
5 bit of time on this. Bob?

6 B. SHIREMAN: Thank you. And I wish
7 I could call on my colleague Tiara Moultrie, who
8 did the actual work, because I frankly don't
9 remember whether the four-digit or six-digit -- I
10 think that the ones in FSA are four-digit.

11 And the four-digit means they're
12 broader. So, they have a broader set of programs
13 included. I think that's right.

14 And the issue is that the DAPIP, the
15 accreditation database, has a program name, so
16 that a programmatic accreditor has identified
17 the, let's say Message, as a program name, and in
18 some cases the name of the relevant program for
19 the school in the FSA database isn't Message,
20 it's a personal services, or something like that.
21 And so, there's a mismatch there.

22 Now, if you have the list of the

1 schools that are accredited by the Massage
2 accreditor, you can usually make a match there,
3 but there's some judgment call in doing that.

4 It would be best if the schools or the
5 accreditor would tell us what the correct program
6 names are, or instead of using the names they're
7 using in DAPIP, to instead use the CIP codes,
8 would be another way of doing it.

9 The other gap is to do the earnings
10 and debt match, you need to know the level. So,
11 not just Massage, but is it a certificate program
12 or a degree program, two-year, four-year, et
13 cetera? And that is currently not in the DAPIP
14 database, although you can still grab the data,
15 and you know what the level of the program is.

16 However, there are some programmatic
17 accreditors that are only a particular level, and
18 we had that in this session, where one of the
19 programmatic accreditors is only doctoral
20 degrees, as opposed to the dental ones that have
21 a bunch of different degrees.

22 So, issues like that make matching a

1 little bit difficult. Now, all of that makes it
2 sound like this is really hard. The reality is,
3 my colleagues picked a few programmatic
4 accreditors to try, and was pretty much able to
5 make the match work and provide the data, with
6 just a few glitches here and there.

7 So, it is totally doable. There's a
8 few glitches to deal with that don't exist in
9 doing the institutional accreditors. But it can
10 be done and it could be done better with the
11 cooperation of accreditors and the contractors.

12 VICE CHAIR PRESSNELL: Yeah, I know
13 that, you know, using the zip codes I think
14 really ensures better accuracy than looking at
15 names, and so yeah, if there can be a movement
16 toward that.

17 So, I'm glad we got the dashboards
18 back. I think the information is incredibly
19 helpful. It gives us kind of a global view of
20 how the accreditors are operating within their
21 sphere of influence.

22 With this additional data, Wally, do

1 you have a vision on how a new dashboard, or a
2 more comprehensive dashboard, will inform our
3 work?

4 W. BOSTON: Sure. I mean, I know you
5 know this because you've been on NACIQI for a
6 while.

7 The dashboard is currently
8 constituted -- one of the things that first came
9 up, and it was actually brought up in our July
10 discussion as a full Committee, there were a lot
11 of questions about why many of the specialty
12 accreditor dashboards just didn't seem to line up
13 with the institutional accreditors' dashboards.

14 And a lot of it has to do with whether
15 they have authority, or they're the gatekeeper,
16 for Title IV.

17 So, you'll see specialty accreditor
18 dashboards that may have a few institutions that
19 they're the gatekeeper for -- as few as three or
20 four -- but 80 or more institutions that they
21 accredit, but none of the details for those
22 institutions are listed because their primary

1 gatekeeper is an institutional accreditor.

2 And so, it led us to believe that
3 given that a substantial percentage of the
4 agencies that we review are specialty
5 accreditors, that we needed to have a relevant
6 dashboard for them as well.

7 And then, even with the institutional
8 accreditors, initially the dashboards that we had
9 a year ago only reflected undergraduate data.

10 You can see that we've had some
11 graduate data added as a result of feedback
12 between the subcommittee and Brian Fu and his
13 team, but at the same time if you go back to the
14 four foci that the original subcommittee put
15 together for the dashboard pilot project, we are
16 still a bit away from being able to have
17 meaningful dashboards.

18 And think again about the other
19 comment that I mentioned. It became clear to us
20 these dashboards are generated once a year, based
21 upon data that is submitted by each agency to the
22 department.

1 So, if you have a dashboard that's now
2 in effect because it was just issued prior to
3 this meeting and the other dashboard disappears,
4 even if both of them existed, you would have to
5 manually put together a review to determine what
6 had changed.

7 And so, that was why our subcommittee
8 felt that flagging changes, which we've yet to
9 sit down and say which changes we would like to
10 see, but let's just take something that maybe
11 universally we could agree upon -- graduation
12 rates -- if graduation rates change dramatically
13 for a group of entities that are accredited by an
14 agency, we would like to see that. And then,
15 we'd have to say what percentage would trigger
16 that review.

17 As it is now with the every-five-year
18 review of an agency, the dashboard comes out
19 annually, but we typically don't have a formal
20 discussion. And part of that process is because
21 this has been a pilot, and the pilot was pulled
22 for a while, and now it's reinstated.

1 And so, we'd like to take this to the
2 next step and say, if we're to have a dashboard,
3 we'd like to have a dashboard with these pieces
4 of data in it.

5 You know which pieces of data are
6 currently feasible utilizing data from the
7 college scorecard, and we know which pieces of
8 data are not currently feasible, and would have
9 to have some intervention from the department in
10 changing their contractors and getting data
11 imported from one database to another. But
12 hopefully that answers your question.

13 VICE CHAIR PRESSNELL: Yeah. No, it
14 does. My last comment is, I think the triggering
15 mechanism that you're exploring to be incredibly
16 helpful, because you know you have flow trends.
17 We expect flow trends on most systems triggers.

18 But if you have some huge variations,
19 which I think that's why accreditors try to
20 receive their annual reports from their members
21 as well.

22 They kind of do a comparative on

1 whether or not they've had a huge shift. They
2 look at enrollment, both increases and drops.
3 And that usually triggers a question what's going
4 on.

5 So, I think that'd be incredibly
6 helpful. So, thanks for all your work.

7 W. BOSTON: Sure. Thank you. And
8 thank my Committee members too.

9 CHAIR KEISER: I have Bob and David,
10 and then I'd like to ask a question.

11 B. SHIREMAN: Yeah, can Mr. Chairman
12 or Wally, or maybe George, remind me what the
13 process would be if we wanted to get input from
14 other outside experts and organizations. It
15 seems that what we're talking about, I can
16 imagine there could be some really good
17 suggestions for how this should be done. And
18 it'd be good to get those in the next few months
19 before we kind of finalize for what some of our
20 requests are.

21 CHAIR KEISER: I'll send that to you,
22 George.

1 G.A. SMITH: Sure. As a subcommittee,
2 you're not governed by the restrictions, or you
3 don't have the restrictions that the full
4 Committee has. And other subcommittees have
5 reached out to lots of different agencies or
6 constituents to help them put things together.

7 B. SHIREMAN: So, we can just reach
8 out, make a request that somebody meet with us?
9 And can we make a general request? Like, could I
10 post on Twitter that, hey, other people who have
11 expertise, we'd love to meet with you. Something
12 like that?

13 G.A. SMITH: Let's see now. Nothing
14 like that has occurred. I'm not sure. I'd want
15 to check in with OGC on that one. I'm likely to
16 find out, but it just seems like a larger or more
17 expanded request.

18 B. SHIREMAN: Yeah. I guess I want to
19 be sensitive to, like, I don't necessarily want
20 to just go to people who I know, and I'm like,
21 hey, I know Joe, I'll ask Joe.

22 (Simultaneous speaking.)

1 B. SHIREMAN: I feel like it would be
2 good to say, like, other people who've look at
3 this stuff that have --

4 G.A. SMITH: But let me check in with
5 my OGC colleagues on that one.

6 B. SHIREMAN: Okay, that's great.
7 Thank you.

8 G.A. SMITH: And reach out to other
9 people for assistance.

10 CHAIR KEISER: It wouldn't hurt to
11 reach out to the agencies themselves too.

12 B. SHIREMAN: Right. Yeah, good
13 point.

14 CHAIR KEISER: David?

15 D. EUBANKS: I just wanted to
16 emphasize something that Wally said I think is
17 really important.

18 When we do institutional accreditation
19 reports, we include histories of graduation rates
20 and retention rates, and we've seen some of those
21 in the exhibits.

22 But when we look at agencies, we're

1 typically looking at the snapshot. It's like
2 this huge landscape and we're trying to explore
3 the landscape.

4 I found it very useful to go back and
5 read the transcripts from five years ago. And
6 Wally's talking about is sort of numeric tracking
7 over time.

8 Many of these agencies talk about
9 processes and continual improvement. I don't
10 think from my recollections, seeing exhibits that
11 track improvement in operations over time. I
12 think that would be a huge advance, whether it's
13 in the dashboard, or just an expectation in
14 reporting.

15 And, as a bonus, I think maybe the
16 agencies would find that they have good things to
17 report. Because, for example, four-year
18 graduation rates have increased dramatically over
19 time.

20 So, I think there'd be a great
21 conversation and a good exchange of information
22 if we could begin focusing on that.

1 CHAIR KEISER: Wally, as an
2 institutional representative, I have a couple of
3 concerns.

4 Yesterday -- I think it was yesterday,
5 with Middle States -- we were starting to talk
6 about some of the institutional performances.
7 And they had -- obviously they used to be the
8 accreditor for Puerto Rico.

9 And Puerto Rico was devastated by some
10 hurricanes that had a huge impact on the data as
11 it reflected against the agency.

12 I just think it is really important
13 that we take into account that there are -- it's
14 just not data that we should be looking at. It
15 is just one part of the process.

16 The pandemic in many cases has also
17 had an impact, especially those institutions that
18 have had a hard time making their transition from
19 on-campus to online environments, that we're not
20 involved in it, and then all of a sudden
21 March 13, at least and prior to this, when we
22 were told to shut down, we had all of our

1 students online, and in a couple of days we were
2 able to do that.

3 But many institutions were not. So,
4 we've got to be careful. Data is important, the
5 dashboard are important. But we do have to look
6 above and below where the data enters. And then,
7 just understand the milieu that the institutions
8 are in, as well as the agencies. That was just a
9 comment. Not necessarily, I don't need a
10 response. Roslyn, and then Jennifer.

11 R. ARTIS: Thanks, Art. I would
12 really echo that comment. I applaud the
13 reinstatement of the dashboard and applaud those
14 who have worked diligently to establish and
15 deepen and broaden the dashboard.

16 Very useful information that allow us
17 to juxtapose what we're seeing with the agencies,
18 against reality, as it relates.

19 However, reality is relative. The
20 dashboard tends to report data that is consistent
21 with first-time, full-time, freshmen, and often
22 is dated information.

1 And so, I think context matters. And
2 as long as we are consuming the data with an eye
3 toward the context that informs that data, it is
4 a useful tool to us.

5 But we should not create an unyielding
6 dependence on data points that may not reflect
7 the unique characteristics of institutions or the
8 student profiles that we serve. And I think
9 we've seen examples of that throughout the last
10 couple of days.

11 And so, I'd just offer that really as
12 both context and a cautionary note. Big fan of
13 data. Prove it. Don't just tell me, show me.

14 However, we cannot rely on it to the
15 exclusion of context and detailed information
16 about the nature and character of the
17 institutions we serve.

18 W. BOSTON: And I would like to
19 interject. These are great points. I was not a
20 member of NACIQI when the original whitepaper was
21 put together for the pilot.

22 But the four foci that our

1 subcommittee members agreed to, the dashboards
2 are not going to be able to include all the
3 information that are in those four foci.

4 So, explanations of changes, like that
5 Art illustrated, what happened in Puerto Rico, or
6 look at -- I mean, WASC is not up, but if you
7 were to look at WASC's dashboard, there are
8 100 plus community colleges in the State of
9 California alone, and we know that community
10 colleges typically, because of the programs they
11 offer, are going to not have the same completion
12 rates that other institutions have.

13 So, dashboards are sort of a starting
14 point for discussions. But the discussions have
15 to happen, the context is absolutely important.

16 And I would note that as far as the
17 first-time, full-time, FSA-only, I mentioned in
18 my report that we ask Brian Fu if we could have
19 data on all completers. And he said we could.

20 So, assuming that the full Committee
21 agrees when we put together the white paper and
22 present it, it's our position that it's important

1 to show data on all completers, not just those
2 who are the traditional first-time, full-time,
3 which we know are in the minority now and not in
4 the majority of college students.

5 CHAIR KEISER: Jennifer.

6 J. BLUM: Yeah, I just wanted to echo
7 you, Art, and Roslyn's comments, and Wally, what
8 you just said as well.

9 And I would like to suggest that in
10 the next phase I would also -- I viewed this sort
11 of in phases, because I think we first needed to
12 get our arms around whether the data is actually
13 usable.

14 And I think we actually have consensus
15 around the fact that in some regard it's really
16 not yet -- particularly as it relates to
17 programmatic accreditors, and sorting through to
18 make it more usable, I think is sort of the first
19 goal.

20 In my own mind, there's a second
21 understanding that I feel like we need as a
22 Committee. And that's the extent to which we can

1 actually use this data in our world on NACIQI,
2 with regard to the recognition criteria.

3 And I think in that regard it would be
4 very helpful in future subcommittee meetings to
5 have the general counsel, WASC, is available to
6 understand how this data fits with our valued and
7 processed age with the criteria recognition that
8 we're utilizing during our meetings and with our
9 agencies.

10 And get along the department staff by
11 the way too. It's not just about us. Actually,
12 more importantly is the extent to which
13 department staff can use the data in a manner
14 consistent with and appropriate with the
15 recognition criteria that they've been given to
16 utilize.

17 So, I just wanted to say that I think
18 we have complete consensus over this first phase
19 of getting the data to be more robust and better.
20 And then, I do think that there's a second piece
21 of understanding how it can be used.

22 CHAIR KEISER: Claude.

1 VICE CHAIR PRESSNELL: Yeah, kind of
2 adding to what Jennifer said there a little bit,
3 I think that it's really important for the
4 Committee to make sure that you articulate what
5 we don't know.

6 So, what are the data telling us and
7 what are our limitations? What do we not know?
8 And so, one question I had related to that, you
9 had talked about data on all completers. Are
10 those also non-Title IV completers?

11 Because so much data analysis is done
12 around only those who receive Title IV funding.
13 And for some institutions, that's a very small
14 percentage of their students. And so, Wally, can
15 you help me on that?

16 W. BOSTON: Sure, Claude. Based on my
17 notes, we could get data on all completers,
18 including non-Title IV. And the reason we can is
19 we're not drilling down to program-specific data.

20 And I could have interpreted this
21 wrong when we had the discussion with Brian, and
22 perhaps George or Herman may want to add in.

1 But the reason we could get all
2 completers is because we're not breaking it out
3 by program or by pay type. We're just saying,
4 these are all the completers for this degree
5 level, undergraduate, graduate.

6 VICE CHAIR PRESSNELL: Okay, great.
7 And I just want to reinforce that context does
8 matter. I think Roslyn's comments were spot-on.

9 CHAIR KEISER: David, and then maybe
10 we can wrap it up.

11 D. EUBANKS: Just a quick comment.
12 There's a data dictionary in the presentations,
13 both the spreadsheet and our appointments.

14 The data dictionary for the
15 spreadsheet has the unit data, as it's prior
16 50 percent full-time, first-time, degree-seeking
17 graduation rates.

18 So, it's cohort rates, I presume, for
19 my kids. So, that would everybody, not just
20 Title IV.

21 CHAIR KEISER: Thank you. So, Wally,
22 I think you have your marching orders. And

1 continue your good work, and thank you for all
2 the members who participated in, I think, this
3 worthwhile endeavor.

4 Okay, the second of this morning's
5 agenda is a policy discussion. And there will be
6 a couple of issues that have been queued up on
7 the policy discussion.

8 But first, the department would like
9 a feedback on the letter that was sent to you two
10 days ago, and was sent to the accrediting
11 commissions, regarding the concept that
12 accreditation is a voluntary process, and in
13 order to change accreditors, there is a structure
14 that the department recognizes.

15 Obviously, for my state that's kind of
16 teed-up this issue in the bill that was passed
17 this last legislature regarding the state
18 universities and community colleges being
19 required to seek a new accreditor at the end of
20 their current recognition period.

21 So, the floor's open for discussion.
22 I think the department would like to hear our

1 feedback. Jennifer?

2 J. BLUM: My first feedback is just a
3 recommendation of the department to not issue it
4 on the first day of NACIQI, because there hasn't
5 been much opportunity to provide feedback, since
6 we're all sort of cramming, like I said to
7 others, I feel like I'm studying for exams with
8 each agency.

9 So, to throw a policy guidance out
10 there the day of, when we're all busy trying to
11 do this job, was not ideal.

12 So, even if it were like a day or two
13 in advance, at least even if it's to us privately
14 or something, if you want our input, then I think
15 issue it earlier.

16 So, that's the first comment. The
17 second comment is, in some regards I wish the
18 department had said what it said years ago.
19 There's been a provision in the regulation for
20 years about what should be the case in terms of
21 form-shopping, as I have called it --
22 accreditation form-shopping.

1 And I feel like across many
2 administrations, the department actually wasn't
3 utilizing a tool that it had to prevent
4 institutions from leaving agencies and going
5 elsewhere.

6 So, I think to some degree it's
7 welcome to have what's stated here, which has
8 been, like I said, could have been within their
9 toolbox for a long time.

10 But I think given what's going on with
11 Florida and the legislature, which I think is the
12 new law, I think it's a necessary reminder to
13 schools that they can't just switch over, which
14 of course in some degree conflicts with the flow
15 of the law. But that will work itself out,
16 hopefully.

17 CHAIR KEISER: Wally, then Bob.

18 W. BOSTON: Sure. I each what
19 Jennifer said about receiving this at the start
20 of the meeting, and not having much time to
21 reflect on it in advance.

22 But for a short reflection, I think

1 part of this is maybe a bit of an overkill in the
2 sense that I just don't see, given the level of
3 effort required, that institutions, willy-nilly,
4 are going to form-shop or consider switching.

5 It kind of reminds me in a prior life
6 when I was a CPA, of requirements that public
7 companies switch their auditing firm every so
8 often.

9 I mean, it's a lot of work to do that
10 and no real benefit, or at least on the surface
11 not a lot of benefit. So, I guess I can see
12 where you would have -- to me, the reversal is in
13 the past, you would go to the accrediting body
14 and get a licensing in the state, and then the
15 accrediting body, and get those approved before
16 you would to the department and get their
17 approval.

18 I think they're now asking for the
19 approval in advance, to, I guess, thwart people
20 who might truly be form-shopping.

21 But I just don't see that. And my
22 concern would be that with the openness of no-

1 borders from our formerly regionals, that
2 perhaps -- to me, that's a good thing and doesn't
3 keep people clustered into the same mindset that
4 they were in the past.

5 So, I'm sitting here observing this
6 and still thinking about it, and not so sure I
7 agree with everything.

8 CHAIR KEISER: Bob, before we go, I
9 see we have a guest who joined us. Dr. Flores,
10 would you like to make a comment?

11 A. FLORES: Good morning everyone.
12 Can you hear me?

13 CHAIR KEISER: Yes, we can hear you.

14 A. FLORES: Great. Just a second.

15 CHAIR KEISER: Would you like to make
16 a comment?

17 (Audio interference.)

18 CHAIR KEISER: Actually, we are
19 getting feedback. So, you have your computer and
20 your phone on? You might want to shut one of
21 those down.

22 (Audio interference.)

1 CHAIR KEISER: We're getting a lot of
2 feedback.

3 A. FLORES: Okay, is that better?

4 CHAIR KEISER: That works great.
5 Thank you. Or it did work.

6 Z. SMITH ELLIS: Now, we can't hear
7 you at all if you're talking.

8 CHAIR KEISER: It's hard with the
9 mask. We can't tell if you are talking. Now, we
10 can't hear you. I'm sorry.

11 H. BOUNDS: Maybe she's on mute, Art.
12 You've got that little mute button on.

13 CHAIR KEISER: I know.

14 Z. SMITH ELLIS: We could hear you
15 when you unmuted. We heard sounds in the room.

16 A. FLORES: Thanks, everyone. Thank
17 you for being patient with our technological
18 challenges.

19 I welcome any questions you have if
20 you have them. But otherwise, I just want to
21 hear feedback.

22 CHAIR KEISER: Okay, great. Then,

1 Bob, you were up. I'm sorry. Go ahead, Bob.

2 B. SHIREMAN: Great. Thank you so
3 much. Yeah, I wanted to elevate, I guess, to
4 what this guidance is really all about.

5 A major reason that our universities
6 in this country are, and for a long time have
7 been, better than the rest of the world, is that
8 they are not run by politicians.

9 There is a separation between the
10 political leaders in our country and the
11 institutions of higher education, especially in
12 private higher education, but also in public
13 higher education.

14 And that has been assisted enormously
15 by our accrediting agencies, particularly the
16 ones that are academically focused, and that
17 protect academic freedom, have standards related
18 to academic freedom.

19 We have seen the way that fascist
20 leaders in other parts of the world, like
21 Hungary, take over their institutions of higher
22 education as one of the ways to wrest control and

1 prevent public debate on the issues of the day.

2 We have a situation in Florida where
3 a governor seems to want to have that kind of
4 power over at least the public universities. But
5 I would add that I fully expect that we will see
6 some situations where states benefits are
7 conditioned on the same kinds of requirements
8 that have been attached to Florida public
9 universities, to have to change their accreditor.

10 So, I see this guidance as an
11 extremely important pushback on an attempt to
12 undermine academic freedom in Florida's colleges
13 in a way that we could well see if they manage to
14 get away with this in Florida, could well see
15 happen in other situations.

16 And so, requiring a school to go to
17 the U.S. Department of Education first before
18 they change accreditors, means that they will
19 have to say, well, we're doing this because our
20 governor doesn't like academic freedom.

21 And I would hope this forces a change
22 in that rethinking of that Florida law. So, I

1 think this is really important. That's my
2 understanding of really what prompted all of
3 this.

4 It has broader effects around some of
5 the predatory college issues that come up in
6 other circumstances. But I think the academic
7 freedom issue is certainly the most important, at
8 least today.

9 And I'd welcome Ms. Flores providing,
10 letting me know whether my understanding of the
11 way this would work is accurate.

12 A. FLORES: I just wanted to add one
13 point to what Bob has said. I think under
14 Secretary Kvaal in his opening provided
15 background to some of the concerns and some of
16 our hopes with how this process will work, as
17 well as what we're trying to accomplish.

18 Part of the clarity that was provided
19 around requiring institutions to seek approval
20 from the department in advance of submitting an
21 application to an accrediting agency, is really
22 because there's been some confusion about our

1 regulations and the way that they're framed.

2 So, 611 says that the department
3 cannot recognize an institution that is in the
4 process of switching accrediting agencies. We've
5 had some confusion around that component, and
6 really want to make sure the process is clear,
7 and that institutions are not running into
8 Title IV issues.

9 CHAIR KEISER: Okay, we have a whole
10 bunch of people. So, it's going to go like this:
11 Jill, Claude, Jennifer, Zakiya and David. Okay?
12 Jill, you're up.

13 J. DERBY: Yeah, I want to follow up
14 on what Bob said. I was very pleased to see this
15 letter come out, and I agree it was right before
16 our meeting, and maybe there wasn't enough time.
17 But I'm glad we're having the opportunity to
18 discuss it.

19 My concern about what has happened is
20 the kind of external political intrusion into the
21 academic process.

22 And it isn't academic freedom so much

1 I'm focusing on in my comments, as much as every
2 one of the regional accreditors have governance
3 standards around independence and the importance
4 of governing boards being independent from
5 external intrusion, whether that's political, or
6 maybe just large-monied interests, whatever.

7 And we've had recently some
8 accreditors call out institutions. And
9 certainly, that's what happened in Florida with
10 the political intrusion.

11 It's a violation of the standards that
12 all the regional accreditors have around
13 governance and the importance that governing
14 boards act independently of whatever kind of
15 inappropriate external intrusions occur in their
16 governing process.

17 And because we're seeing that in other
18 ways across the country, I think that's really a
19 threat to the whole higher education enterprise.
20 And really, I want to just repeat what Bob said,
21 in terms of around the world, where you have
22 governments that are really deciding curricula

1 and putting those kind of limits on universities
2 that haven't thrived the way American
3 universities have.

4 I think it's really almost an
5 existential issue to see the kind of political
6 intrusion that's going on across the country,
7 into the governance process that was created in
8 America.

9 Unlike most countries where the
10 government runs higher education, we have
11 independent boards that are charged with
12 governing the institutions, and their
13 independence is encoded in governance standards
14 by all the regional accreditors.

15 CHAIR KEISER: Claude?

16 VICE CHAIR PRESSNELL: Yeah, thanks,
17 Jill. Because I think that's really a primary
18 point that I was going to make as well, is that
19 one of the fundamental criteria for accreditors
20 is under governance and the independence of the
21 institutions.

22 I think what's happening in Florida is

1 largely uniformed, in terms of the accreditation
2 process.

3 Whoever's making these decisions is
4 really not informed about how it works, and to
5 making blanket policy about switching accrediting
6 bodies demonstrates that ignorance, and also
7 doesn't give any acknowledgment to the diversity
8 of higher education in the State of Florida.

9 So, these institutions are different
10 and they have different needs, and based on the
11 breaking up of the regional cartel, if that's
12 what you want to call it, breaking in this manner
13 is giving institutions the option where it
14 doesn't mandate that they do it.

15 So, you know, there were two big
16 things that happened under the previous
17 administration: one, the removal of the
18 geographic boundaries, and then, two, and one we
19 haven't seen play out completely yet, but is no
20 longer distinguishing between national and
21 regional accrediting.

22 Now, they seem to think that that is

1 a logical consequence of removing the boundaries.
2 But having been in accreditation for nearly
3 30 years, I can tell you there are significant
4 qualification differences between the former
5 national accrediting bodies and the regional
6 accrediting bodies.

7 And to ignore those differences, I
8 think we do that at our own peril.

9 I was interested to see exactly what
10 would happen when these things occurred, when we
11 no longer distinguish between national and
12 regional, and then when those boundaries were
13 eliminated.

14 This I didn't anticipate, that a state
15 government would put out some type of a blanket
16 mandate. And again, it's truly politically
17 motivated, which is the wrong motivation, and
18 that would be condemned.

19 If we have to put in this extra step
20 to make sure that there's not undue influence,
21 then I think we have to do that.

22 So, I'm disappointed in what's

1 happening in Florida. I think it's unfortunate.

2 CHAIR KEISER: Jennifer, Zakiya,
3 Robert, David.

4 J. BLUM: Yeah, so just to echo off of
5 Claude, but I want to go back to something that
6 Wally -- so I want to echo and Bob and the
7 others, that this isn't just, in my view, and
8 this is what I was trying to say before, but I'm
9 going to say it again.

10 In my view, some of this clarification
11 actually is worthwhile, not just because of
12 what's going on in Florida, but the fact is,
13 Wally, we have seen form-shopping in
14 accreditation. It's part of what was the problem
15 in the last ten years, as we did see some
16 institutions change accreditors.

17 And it created an accreditation
18 problem. And we don't have to go into which
19 agencies, but we did see institutions migrate
20 because they felt like one agency would be more
21 favorable to them than others.

22 And there was an opportunity,

1 honestly, for the department to have stepped up.
2 And now, I think it's making it more clear that
3 there is a regulation -- and this is my
4 interpretation -- that is clarifying the steps
5 that need to be taken, which I think is really
6 worthwhile.

7 And then, we have this overlay of the
8 Florida problem. I am an advocate for the
9 ability of institutions to be able to change
10 accreditors from time to time.

11 I think that is actually quite
12 important. There are lots of different reasons
13 why, and a very well-motivated reason to change
14 an accreditor for positive reasons.

15 And I hope that the department uses
16 its own guidance and its own regulations to
17 navigate that balance, to be able to distinguish
18 where it really makes sense for an institution,
19 for good reasons, to change to a different
20 agency, or a different programmatic agency, and
21 from one programmatic to another.

22 And I think that that's going to be,

1 to be honest with you, the most important piece,
2 is how the department handles deciphering what's
3 going on when an institution does use its own
4 independence to make that decision to change, and
5 how the department looks at each of those
6 situations contextually, which, to me, that's the
7 most important next step.

8 CHAIR KEISER: Okay, Zakiya?

9 Z. SMITH ELLIS: Thank you. Well, I
10 would just offer my support for the department in
11 putting this guidance out, given all the things
12 that are going on, timing notwithstanding.

13 And I have a lot of empathy for just
14 folks that work in government in these kinds of
15 positions.

16 So, I assume that if anyone in this
17 Committee has additional thoughts, we could send
18 them to you, we can share them with you after
19 this meeting is over.

20 And so, I'm sure we'll all have the
21 opportunity to continue to noodle on this and
22 look into it further. And now that it's public,

1 I'm sure you'll get a lot of responses from other
2 members of the public as well, and feedback from
3 interested parties. So, I appreciate that.

4 And overall, the need for clarity on
5 these kinds of things. Because of what Claude
6 mentioned, people in these state environments
7 often are just not well-versed in the intricacies
8 of the federal rules and regulations, and
9 operating in their own environments.

10 So, my only feedback would be to, if
11 you aren't already, I know there were
12 representatives that went to the SHEEO
13 conference, but to engage with state higher
14 education offices, but also to engage with
15 governors offices.

16 Because sometimes there's, for
17 whatever reason, a difference between governor's
18 office and the SHEEO, and those governors have
19 education policy advisors.

20 So, they are, I'm certain, mostly not
21 familiar with NACIQI, or the rules around
22 accreditation, or what the consequences of some

1 of these actions might be.

2 I, like Bob, am really alarmed at the
3 direction of politicizing higher education in
4 this way, and really infringing upon what is a
5 really basic concept of academic freedom and the
6 ability to learn unfettered from political
7 interference in the content of what is learned.

8 And so, one of the biggest things that
9 we should be focused on -- and I think
10 particularly within public college. I would
11 express like that's probably the place where
12 you -- you know, sometimes you go to a college
13 and you expect that it's going to be tinged with
14 some kind of agenda because of the nature of the
15 private affiliations.

16 But within public colleges and
17 universities, the expectation should be that they
18 are free from that kind of interference.

19 So, where we are seeing that how we
20 put safeguards in place to be incredibly
21 important. But we never want to see any student
22 lose access to higher education, and certainly

1 not a system that has access to federal aid.

2 And so, the consequences here are
3 really stark, and I don't want this to be a game
4 of chicken between governors or state legislature
5 and the federal government.

6 And I would just note there's
7 oftentimes tension between state and the federal
8 government, in terms of who gets to control what.
9 And I've seen that in a democratic-led state
10 there's sometimes tension between, hey, the
11 federal government can't tell us what to do,
12 etc., etc.

13 But sometimes it can. And a lot of
14 times it is just ignorance about the rules. And
15 so, as much as you can, engage with folks in
16 state legislature.

17 I can't emphasize enough how -- I
18 don't mean this to sound crass, but how little
19 they pay attention to kind of -- like, if you're
20 in DC, it seems like everybody's focused on
21 NACIQI, or what's going on.

22 But they have completely different

1 things that they're working on. So, to the
2 extent that you can be proactive in engaging with
3 them to help them understand what the rules are,
4 again, I applaud you so much.

5 And even coming up with something that
6 they can read and review in, not just regulatory
7 text language, but plain-English. So, really,
8 thank you for doing this, and just encourage you
9 to go further on the engagement.

10 CHAIR KEISER: Robert.

11 R. MAYES: Thanks, Art. You have some
12 departments -- in part of their guidance they
13 released the reasonable causes for switching that
14 was not reasonable. I thought they did a pretty
15 good job on that as well.

16 And of course highlighting, if a
17 school is looking to leave because of sanctions
18 or actions against them, that's not a good cause.

19 And then, they also highlighted, under
20 the good reasons, if you're seeking, because the
21 other accreditor may be aligned with your mission
22 better or something, and those are valid.

1 So, I think overall the opening of the
2 regional boundaries is a good thing, like others
3 have echoed, and can be.

4 Because there are different cultures,
5 there are different memberships, and those can be
6 better fits.

7 Leaving for the bad reasons, of
8 course, it would make sense that they have
9 concern over this, and I understand that
10 completely.

11 And it's good to get guidance and
12 clarification on all of it as well. Thank you.

13 CHAIR KEISER: David.

14 D. EUBANKS: Thanks for this
15 opportunity, first of all. And I've just got a
16 quick comment, and then a question related to
17 Robert's.

18 Anything that breaks up the status quo
19 could be good or bad when the status quo isn't
20 great. So, maybe there are some positive spins
21 on changing accreditors.

22 I've noticed, my time on NACIQI, that

1 the ones that's usually the best job are the ones
2 that are the most specialized. And you could try
3 to do a whole lot of different things with a
4 whole lot of different types of institutions.
5 It's harder.

6 So, maybe what comes out of this is
7 national specialized accreditors that can treat
8 our research institutions, vis-a-vis colleges and
9 so forth, but actually end up doing a better job.
10 So, that's open possibility on a positive end.

11 The question is about the guidance
12 issued by FSA on reasonable cause, which Robert
13 touched on. I don't pretend to understand this.

14 It says, the carry-out's
15 responsibility is under 34 CFR 600.11, FSA must
16 make a reasonable cause determination, I assume,
17 to whether or not the institutions can change
18 into prior. Is there a way to put that in plain
19 English? I'm sure people would be interested.

20 CHAIR KEISER: Okay, Steve? I thought
21 David was finished. Are you finished, David?

22 D. EUBANKS: I asked a question, I

1 don't know if anybody on the call wants to add an
2 answer.

3 CHAIR KEISER: Let's go to Steve and
4 then we'll have a final discussion and get
5 feedback from Dr. Flores.

6 S. VAN AUSDLE: Going back to what Bob
7 said, it seems like this is a real threat to
8 potential institutional quality of integrity if
9 higher ed in the nation.

10 We're the Advisory Council on
11 Institutional Quality and Integrity and should we
12 take a more public position on raising our
13 concerns about what this might do in terms of
14 integrity of our institutions if we do fall into
15 a situation where we no longer have the
16 separation between the government and higher
17 education.

18 As Jill pointed out, is it appropriate
19 for NACIQI to come out with a very public
20 statement with our position at this point in time
21 as an Advisory Committee? It's a question.

22 K.S. ALIOTO: I think that would be a

1 good idea but I have a concern about our
2 politicizing this situation further by doing
3 that. And I think that it is a very dangerous
4 political situation that we're talking about
5 here.

6 And we're also talking about a
7 Governor who is seriously considering running for
8 president. So, I don't want to have this be part
9 of anyone's platform.

10 That would be my hesitation from the
11 suggestion that we do something as a group. But
12 I guess as a Republican and Democratic group of
13 people concerned about the future of American
14 education, perhaps we should.

15 CHAIR KEISER: Thank you, Kathleen.
16 I tend to agree that we should not be political
17 and be in the middle of the political debate, but
18 I do want to thank and would like to hear from
19 Dr. Flores, but it is really refreshing to hear
20 that you are interested in our opinions, which I
21 think is really good.

22 It's the first time that I can

1 remember that happening and I think that's a
2 great testimony to the Department wanting to hear
3 from the Advisory Committee.

4 I think they've heard a very diverse
5 opinions here and though all pretty much aligned
6 with a concern for the independence of
7 institutions to choose their accreditor.

8 I see two, three hands up again so
9 we'll keep going. Zakiya, you're first,
10 Jennifer, you're second, and then Jill, you're
11 third.

12 Z. SMITH ELLIS: Thank you, I feel
13 like Jill might have been before me but I'll be
14 just very brief in my response to what Kathleen
15 said.

16 I think regardless of whether we
17 decide to do anything as a group or not, it is
18 unavoidable that this has become political in
19 this group.

20 Because it is a bipartisan group of
21 people with both Republicans and democrats, if
22 there is a general consensus about the nature of

1 accreditation and what it should be I think that
2 actually serves to maybe not de-escalate but show
3 where there is -- this has become political
4 because a person who has a political agenda has
5 used it.

6 And if you stayed silent in that,
7 you're allowing that narrative to continue to
8 just have a left-leaning slant and a right-
9 leaning slant and if there's a general consensus,
10 I think there's great value in showing that so
11 that you deflate some of that to say no, this is
12 not a left-right thing, this is a here's what
13 quality in higher education is supposed to be
14 about.

15 Just my two cents there.

16 CHAIR KEISER: Jill, go ahead and then
17 Jennifer.

18 J. DERBY: Yes, this may be political
19 but it's not partisan and the Florida instance
20 that has really triggered this is one instance of
21 things happening across the country where we see
22 this kind of legislative and political

1 interference in the governance process of our
2 colleges and universities.

3 So, I think it rises to the occasion
4 of our group making a statement about it, it's
5 not a partisan issue at all.

6 We're all about, as Steve pointed out,
7 quality and integrity and this is all about
8 integrity in higher education and allowing for
9 the independent governance that has always been
10 for several hundred years a characteristic of
11 American higher education and part of what has
12 made it great.

13 As opposed to so many countries where
14 there's the political interference that decides
15 curriculum and the other issues around higher
16 education.

17 I think this is one of the most
18 important, if not the most important issue that
19 we're dealing with in higher education across the
20 country, not just Florida but other places.

21 And I think it's terribly important
22 that there is pushback from the Department of

1 Education from our group that says, no, there's a
2 reason that all the accrediting agencies have
3 standards that require independent governance.

4 And specifically to keep the political
5 hands out of running colleges and universities.

6 CHAIR KEISER: Jennifer?

7 J. BLUM: Yes, I would second what
8 Zakiya and Jill just said too. I would support
9 the concept of a letter.

10 You almost don't even have to
11 reference the particular state if you don't want
12 to, it's really more around the principles that
13 we all I think collectively have consensus around
14 in terms of the value of institutional
15 independence and governance and Bob, to your
16 point, having myself done some global work, it
17 heightens my appreciation for the way we operate
18 with all the faults here too.

19 And so I think we could write a non-
20 political letter, if you get what I'm saying,
21 that is consensus-driven. I did want to also go
22 back to something that David said and I do hope,

1 Dr. Flores, that you'll maybe not on the fly but
2 give it some thought.

3 This issue, and I raised it too, I do
4 want to be really careful that there are
5 situations where institutions may sometimes have
6 dual institutional accreditation and I actually
7 applaud that often.

8 There are some agencies that are
9 highly specialized in a particular way and yet
10 they still want to be, quote, unquote, regionally
11 accredited and so they do both for a period of
12 time.

13 And I applaud that, actually it takes
14 a lot of resources to do that and I actually
15 applaud the thoughtfulness of institutions that
16 choose to do that, that's an example. And then
17 eventually they migrate to one or the other.

18 I think as the government laying off,
19 if you will, there needs to be a lot of respect
20 and deference to those institutional types of
21 decisions while protecting, of course, Title IV.

22 And I haven't really paid close

1 attention to the simple clause, the language that
2 David mentioned, and I do think understanding
3 what your intentions, not yours personally, the
4 Department's intentions are in that regard would
5 be extremely helpful.

6 Just to protect the ability of
7 institutions to make good choices with regards to
8 accreditation. So, I would welcome any reaction
9 you have recognizing this on the fly.

10 J. DERBY: I would suggest that a race
11 to the bottom only matters if the bottom is bad
12 and our job is to prevent that from happening.
13 So, if the worst accreditor out there is actually
14 really good, they can shop around all they want.

15 And I see the role of this group, the
16 people on this call, is preventing that from
17 happening, which solves the whole problem,
18 doesn't it?

19 CHAIR KEISER: Dr. Flores, do you
20 have any comments? It looks like you have a
21 suggestion for us.

22 A. FLORES: I want to respond to a

1 couple of points. First, to yours, Art, on
2 thanking the Administration for wanting to hear
3 from the Advisory Committee.

4 You've heard from various Members of
5 the Administration at every NACIQI meeting to
6 date and I think everyone has consistently
7 encouraged sharing your opinion.

8 We very intentionally included time
9 for a policy discussion. I will reiterate that
10 we want to hear from you and your recommendations
11 and want to continue to encourage these
12 discussions.

13 The second point I want to address I
14 believe is yours, David, in regard to reasonable
15 cause.

16 We have outlined the broad factors
17 that we will take into consideration and have
18 left it broad intentionally because multiple have
19 alluded to this but it's going to vary for each
20 institution their motivations for changing the
21 consistent in which they have engaged with their
22 accrediting agency and where they stand.

1 So, each of these factors will have to
2 be considered on a case-by-case basis in
3 consideration of all facts and circumstances.

4 Are there other questions that I am missing?

5 R. MAYES: That would be great. How
6 that first section reads that you're talking
7 about, it states that the Secretary does not
8 recognize the accreditation or pre-accreditation
9 of an otherwise eligible institution if an
10 institution is in the process of changing its
11 accrediting agency unless it provides the
12 following.

13 So, it kind of sounds like -- I guess
14 can you explain that? What does that mean by
15 does not recognize the accreditation?

16 A. FLORES: That is part of the reason
17 we're issuing this guidance. It's not very clear
18 to institutions and want to be sure that the
19 process does not lead institutions to be in
20 violation.

21 The requirements under here for
22 Secretarial approval are long-standing, as is

1 reasonable cause as included in the Higher
2 Education Act.

3 And so wanted to provide some further
4 examples and considerations that we will be
5 evaluating when institutions submit applications
6 for changes.

7 R. MAYES: So, is it more talking
8 about the Department may not recognize their
9 change, not so much recognize where they're
10 currently at?

11 A. FLORES: That's right, it's really
12 about the change.

13 CHAIR KEISER: Any further comments?

14 J. DERBY: Yes, I do.

15 CHAIR KEISER: Go ahead, Jill.

16 J. DERBY: I just wanted to clarify
17 that we're really talking on two different levels
18 and about two different issues. So, we're
19 talking about the guidance that's being issued
20 about institutions changing accreditors.

21 The larger issue that Bob initially
22 pointed to I think is a very critical one about

1 the political interference that really threatens
2 the governance independence.

3 And I don't want to lose sight of that
4 because I think on the one level we're responding
5 to the guidance that's being issued and I think
6 that's really important and appropriate.

7 And that's why the short notice is
8 maybe a little challenging for us. But the other
9 larger issue I don't want to lose sight of and
10 with the suggestion Bob made about this group
11 issuing a statement for the larger issue of the
12 political interference of independent governance
13 and the violation that represents of our whole
14 principle.

15 CHAIR KEISER: I'm not sure where you
16 want to go with this, Jill.

17 One of the concerns I have is for us
18 to make a judgment, I'm not sure we could do that
19 without more information but I think Bob's
20 suggestion of a very broad concept that we
21 believe there should not be political
22 interference, I would accept that.

1 I think that's an appropriate thing
2 but to get into the individual issues, that was
3 debated in Florida.

4 I personally don't agree with what
5 happened but I don't think we have enough
6 information to make any particular statement
7 about that. Bob, you had your hand up and then
8 Jill, go ahead.

9 J. DERBY: I was referring to the
10 broad statement, exactly what you said, and not
11 to the particular issues.

12 CHAIR KEISER: Bob?

13 B. SHIREMAN: Thanks, I actually think
14 it was somebody else who suggested that we issue
15 some kind of a statement and I think the question
16 of timing was not totally clear in that
17 suggestion.

18 I agree that given how we struggle to
19 adjust jointly and it's a motion, I really don't
20 want to spend the time trying to figure out a
21 statement that we can all agree to today.

22 It just would not be good and I think

1 that we would want to spend more time gathering
2 information when the reality is there may well be
3 a discussion about this during the SACs
4 discussion since the controversy involves SACs.

5 So, I think more information will
6 come. I could imagine us putting together a
7 Subcommittee on institutional independence and
8 academic freedom.

9 Maybe they're not really thinking this
10 through, maybe there are other actions that could
11 be taken.

12 And I think that feels to me like
13 something like that, like a more valuable longer-
14 term way to think about this issue.

15 CHAIR KEISER: Claude and then
16 Kathleen?

17 VICE CHAIR PRESSNELL: I would agree
18 with Bob's assessment on trying to get something
19 in in appropriate time. It's probably not going
20 to happen but I think the transcript of this
21 discussion actually makes a very good point.

22 The next thing I'm going to talk about

1 or just want to mention, this is neither good nor
2 bad, but this is the way policy seems to happen
3 at the state level. There is rarely one state
4 that figures out everything they want to do, they
5 do it independently.

6 Other states are watching what's
7 happening in Florida and there are a lot of
8 Governors that are watching DeSantis and looking
9 at his policies to see if they're policies they
10 want to replicate in their own state.

11 So, that's just how state policy
12 works. You'll have legislators go to these
13 national meetings, they'll talk about policy and
14 they'll come back with a policy, a boilerplate
15 policy, and many of them forget to really edit
16 the boilerplate well enough and you see the wrong
17 state's name is in it.

18 But those things happen and so I think
19 that this could happen with this issue, I hope it
20 doesn't. But I just thought I would throw that
21 out there.

22 CHAIR KEISER: Kathleen and then I'll

1 make one final statement from me. You're muted,
2 Kathleen.

3 K.S. ALIOTO: In terms of what do we
4 look like?

5 CHAIR KEISER: What's that?

6 K.S. ALIOTO: What Claude was just
7 saying, that's my concern about having a little
8 better gain, it would just become something that
9 other Governors would do, other states would do.

10 I agree that we need to have some kind
11 of letter to go out but once again, I think that
12 should be focused around quality and integrity
13 and not get involved in the politics of this.

14 VICE CHAIR PRESSNELL: Let me just add
15 one thing to that, one observation. I think that
16 the Department's guidance letter actually steps
17 in the breach on this and slows it down, so, yes,
18 it may happen and I get that, and typically these
19 things do happen this way.

20 But I would say that what the
21 Department is doing here I think is helpful to
22 mitigate that.

1 So, even if it does happen, if they
2 follow the Department's guidance, it still goes
3 back to institution by institution evaluation or
4 moving from one accrediting body to the other.

5 And again, I'm not opposed to that
6 type of mobility for institutions if they want to
7 do it, but let me tell you, it's not nearly as
8 easy. The accreditation officers on the campus
9 will tell you oh, my goodness, you've got to be
10 kidding me, you want me to now align the
11 institution with everything over here versus over
12 here.

13 And although they're close, they're
14 not close enough and so I think what's happening
15 here with the Department, I give them credit, I
16 think it slows this down a bit.

17 K.S. ALIOTO: Okay, thank you.

18 CHAIR KEISER: If I may make a comment
19 and then Zakiya and then I saw somebody else's
20 hand up. Dr. Flores, you're first, go ahead.

21 A. FLORES: I just wanted to make one
22 point of clarification in regard to David's

1 comment about reasonable cause.

2 The way the regulation is written, the
3 Secretary does not approve the Title IV
4 recognition of an institution that is in the
5 process of changing accrediting agencies without
6 that approval.

7 Our concern there and the motivation
8 for issuing that guidance is that it potentially
9 can lead to the loss of Title IV.

10 And so we want to avoid that but also
11 felt like we had to clarify some of the reasoning
12 for what would be considered reasonable. So, I
13 just wanted to clarify that one point, thanks.

14 CHAIR KEISER: Thank you, and if I may
15 just say, again I do believe in Florida's very
16 interesting way of approaching a problem.

17 I do understand that the Governor and
18 the legislature's own state universities that
19 control the budgets, and unfortunately, whether
20 it be Florida, North Carolina and other states,
21 you've seen the involvement of the legislatures
22 in their own institutions, which is there and

1 real. But I would agree with Bob that the
2 overarching issue is the independence of the
3 institution, which is the critical part, even
4 though they really are not independent because
5 again, the budgets are controlled by the
6 legislature and the Governors.

7 So, it's an interesting problem and I
8 think there's some really good discussions that
9 have occurred. Zakiya, I might give you the
10 final word.

11 Z. SMITH ELLIS: Thank you, I
12 appreciate this discussion and at my first
13 meeting I didn't think -- this actual issue I
14 feel like I want to provide some context to the
15 Department just given that my last role was in
16 the Governor's office and we dealt with the
17 legislature and we did the budgets for the
18 policies.

19 And that's why I am very adamant that
20 I agree with what Claude said about they're being
21 just a level of ignorance and I mean that in the
22 best way about what the federal ramifications of

1 their actions are. And applauding this
2 communication or this clarification and just
3 really encouraging that outreach.

4 Because to Kathleen's point about what
5 do we do about this, we're concerned about it,
6 making sure that this doesn't begin to
7 proliferate in other places.

8 I could see a Governor that was on the
9 left saying I'm going to tell everybody that they
10 have to teach X, Y, and Z.

11 And it's like no, that's not what we
12 do, so just being very clear that there is
13 academic freedom and independence in terms of
14 what is taught at the higher education level as a
15 core principle of academic integrity being the
16 thing that needs to be communicated and being
17 taught really.

18 You need to teach people about this as
19 a core principle. Again, it's ignorance in the
20 best instance of the word and thinking, yes,
21 sometimes and it's different in K-12.

22 In K-12 you very much say we're a

1 state, you decide this is what you're going to
2 learn, these are the standards, you're going to
3 teach X, Y, and Z, you're going to teach New
4 Jersey state history, you're going to teach it in
5 this way.

6 I was a teacher in Tennessee, you're
7 going to teach that Andrew Jackson was the
8 greatest president that ever lived, et cetera.
9 That's not what you do in higher education and
10 there are rules around that and it's very
11 important they understand the distinctions there.

12 So, I again just am encouraging that
13 hearing that with my fellow Committee Members
14 that this communication from the Department can
15 be a way to mitigate this proliferating further
16 and anything that we want to do I defer to the
17 expertise of others' knowledge of how this
18 Committee has operated in the past about whether
19 a further statement from the CP as a whole would
20 be valuable in addition.

21 CHAIR KEISER: Roslyn, we'll end with
22 you because you had your hand up earlier.

1 R. ARTIS: I did but my colleagues are
2 so able to read my mind and say exactly what I'm
3 thinking, and Zakiya has just done a phenomenal
4 job of doing that. I would simply echo it is not
5 easy to transition to a new accrediting body.

6 I do not believe institutions willy-
7 nilly are going to be jumping ship accreditation-
8 shopping. I think that's the least of our
9 concerns.

10 I do think, however, there is a
11 likelihood that other Governors might follow the
12 example of Florida, given whatever political
13 climate. It could be, again, non-partisan but
14 political, per Jill.

15 I do think just as we have seen with
16 Roe V. Wade, now states have the ability to do
17 something very, very different.

18 I think we or the Department needs to
19 make a very clear, coherent statement that it
20 does retain control ultimately of the ability to
21 access Title IV and a whole host of other
22 benefits.

1 And that institutions seeking to
2 comply with mandates from government is an
3 encroachment. I think we need to be very clear
4 and very coherent about that and I think very
5 much to Zakiya's point, simplicity is the order
6 of the day.

7 Short, clear, declarative statements
8 that make plain that we support our institutions,
9 and I think if there are additional requirements,
10 i.e., seeking the permission of the Department of
11 Education prior to migrating to another
12 accrediting body, it adds a burden to our
13 institution that will then create a groundswell
14 of support or not from our institution to push on
15 Governors or other people who would seek to
16 encroach on the rights of institutions and the
17 academic freedoms typically enjoyed by higher
18 education institutions.

19 So, I think we will unwittingly make
20 the institutions our greatest ally in this
21 because it becomes a burden for the institutions
22 that are often underresourced, understaffed, and

1 quite frankly, busy with the core work of
2 educating students, particularly as we're at the
3 tail end of COVID-19.

4 So, I do think a subsequent
5 communication is in order, very carefully
6 crafted, very simply stated that asserts, quite
7 frankly, the control, if you will, and I mean
8 that in a good way, of the Department of
9 Education over these matters, and reinstating the
10 control in our institutions, trusting in good
11 faith in our institutions, that they're not
12 shopping for accreditation.

13 Rather, they're seeking affirmation of
14 the quality of the education they provide and to
15 the earlier points, they abide my colleagues from
16 South Carolina, I think our goal as NACIQI is to
17 ensure that each of our accreditors adheres to a
18 certain minimum level, minimum standard and that
19 we're holding our institutions accountable.

20 We all believe deeply in the peer
21 review process, let's trust the process and
22 protect that which is sacred to higher education

1 and that is academic freedom.

2 CHAIR KEISER: Beautifully stated. Is
3 there anything else you want from us, Dr. Flores?

4 A. FLORES: Thank you for the
5 feedback, I really appreciate it.

6 CHAIR KEISER: Thank you for listening
7 to us.

8 Another issue that was brought up,
9 Jennifer, she was just asking about feedback on
10 some of the actions we've taken in the past. Do
11 you want to bring that up, Jennifer?

12 J. BLUM: I have to say, I don't know
13 what you're referencing, apologies.

14 CHAIR KEISER: George?

15 G.A. SMITH: Jennifer, yes, ACICS are
16 there and then another agency. Can you hear me?

17 J. BLUM: Are you talking about
18 migration? Are you talking about accreditation
19 migration, George? I wasn't sure where you were
20 going with that.

21 CHAIR KEISER: No, we're just talking
22 about the recognition.

1 J. BLUM: Sorry, apologies. Do you
2 want me to tee it up? Apologies. So, before
3 this meeting when George asked for topics, I
4 asked for an update on the status.

5 Because one thing I do feel is really
6 important to institutions and the agencies is
7 that we do these, they go through a lengthy
8 recognition petition process. They come then
9 before us, it then goes to the SDO, there's an
10 appeal process, lots of processes.

11 And with regards to those two
12 agencies, we have not heard, I don't think the
13 public has, we haven't heard from the SDO a final
14 determination.

15 I know there's been appeal processes
16 but there are two agencies, one is 18 months now
17 outstanding, I could be wrong exactly about the
18 number of months.

19 I think that would be ACICS and the
20 other is I think would be one year out now from
21 when we made the recommendation. And so I did
22 ask the Department if there was a way, the answer

1 may be no, to receive an update on timeframes.

2 And I did but this into the policy
3 conversations because to the extent that NACIQI
4 makes recommendations about future regulation or
5 registration, it does strike me that
6 understanding the timeframes by which an SDO must
7 make a final determination after an appeal might
8 be something worth conversations, since it has
9 been a long time for those two agencies.

10 That was my inquiry.

11 G.A. SMITH: So, this is the most
12 simplistic update I can give you. The process
13 remains ongoing and the Department is doing a
14 thorough review before any decisions are made.

15 J. BLUM: Thanks, George, I figured
16 that might be the answer and that's fine.

17 Like I said, part of the reason I was
18 raising it is in the context of a policy
19 conversation, to the extent that part of our
20 allowable role is to think about recommendations
21 in the future.

22 This would be one where I feel like

1 there does probably need to be an end timeframe
2 for the benefit of the students and institutions
3 and agencies.

4 And so I suppose it's up to you
5 whether we have a conversation on that, but it
6 does feel like a lengthy amount of time to make a
7 final decision.

8 CHAIR KEISER: Jennifer, I'm not sure
9 that's our role and I think George just said it,
10 they're still in the process. When they want to
11 make an announcement I'm sure they will.

12 Bob, you had a couple of other
13 discussion items, do you want to bring them up
14 now?

15 B. SHIREMAN: I'm trying to remember
16 what they were.

17 I think one was about making public --
18 yes, maybe one was about motions and I feel like
19 we've made a lot of progress on that and we're
20 getting better and feeling more --

21 CHAIR KEISER: Thank you for your
22 advice.

1 B. SHIREMAN: Thank you for that. I
2 wanted to thank the Department for the progress
3 they're making in terms of making more
4 information public sooner.

5 The availability of the full redacted
6 staff analyses I think has been useful to folks
7 who follow accreditation and follow NACIQI and
8 will be useful in the discussion of SACs coming
9 up since there was so many items, so much
10 complexity.

11 I really appreciate that and I think as the
12 Agencies gets better at redacting material I am
13 hopeful that the Department will consider the
14 requests to make additional material available
15 and also make things available earlier so that
16 people in addition to us can analyze the
17 information, write about what's happening in
18 accreditation and on NACIQI.

19 Again, I want to thank the Department
20 for responding to those requests and encourage
21 more.

22 CHAIR KEISER: I think you covered

1 your topic.

2 Any other topics that want to be
3 brought up before the policy discussion? Okay,
4 we are 25 minutes before our scheduled lunch
5 break but I want to make a couple comments.

6 G.A. SMITH: I want to say, Art, at
7 some point when you said there are third-party
8 commenters after the policy.

9 CHAIR KEISER: Correct, we do have
10 them. Bernie, are you there? Dr. Fishman?

11 M. FREEMAN: He's on the phone, I just
12 moved him over to the last meeting so he should
13 pick up shortly.

14 CHAIR KEISER: Bernie, are you there?

15 M. FREEMAN: If not, we can move to
16 the second person, Edward Convoy, and then when
17 Bernie comes in then take it.

18 CHAIR KEISER: Edward Convoy from the
19 New American Foundation, are you with us? Our
20 technology is not working today.

21 M. FREEMAN: He said he's joined.

22 CHAIR KEISER: Edward Convoy, are you

1 there? I don't see you on the screen.

2 E. CONVOY: I am here, yes.

3 CHAIR KEISER: You are? There you
4 are, great, you have three minutes to make
5 whatever comments you'd like.

6 E. CONVOY: Good morning, my name is
7 Edward Convoy, and I serve as a senior policy
8 advisor for Higher Education of New America.
9 Thank you for the opportunity to comment today.

10 As you all well know, NACIQI plays a
11 vital role in ensuring quality in higher
12 education, particularly in protecting students
13 from attending poorly performing institutions and
14 helping ensure that the Government's investment
15 in federal financial aid is well spent.

16 Advice from NACIQI can determine
17 whether accreditors keep or lose the power to
18 decide if a college can receive federal financial
19 aid.

20 Therefore, it's disappointing that the
21 NACIQI review process failed to provide NACIQI
22 Members the opportunity to properly evaluate

1 whether accreditors are doing enough to protect
2 students from poorly performing institutions.

3 In particular, the Department is
4 failing to provide transparency into the
5 accreditation process by limiting the amount of
6 time NACIQI Members and the public have to review
7 the materials before the NACIQI meeting.

8 This was just raised by one of your
9 Members. Staff reports on accretitor compliance
10 need to be made available to the public and
11 NACIQI Members ahead of the Federal Register
12 notice inviting public comment.

13 These are complex reports that touch
14 on issues requiring more than a cursory review.
15 For the public comment process to be meaningful
16 and for NACIQI Members to fulfill their roles
17 properly, there must be adequate time for
18 thoughtful reviews so commentators can provide
19 useful input.

20 In addition, NACIQI must conduct
21 stricter reviews of accretitor actions related to
22 institutions engaged in fraud against their

1 students.

2 The Sweet v. Cardona case that the
3 Department has recently agreed to a settlement
4 for includes more than 150 institutions that
5 systematically defrauded their students.

6 These institutions were or are in
7 violation of the accreditor standards but
8 troublingly very few of those institutions
9 received any form of disciplinary action from
10 their accreditor.

11 It seems as if the gatekeepers of
12 higher education quality and of the taxpayer
13 dollars that fund federal financial aid are
14 asleep at the wheel in some cases.

15 Finally, as NACIQI Members raised this
16 morning, it has been more than a year since
17 NACIQI recommended the termination of ACICS, an
18 accreditor, and the Department made the initiate
19 decision to follow that recommendation.

20 ACICS has appealed that decision and
21 the Department appears content to let the appeal
22 languish rather than taking strong action. The

1 Department must make timely decisions unless it
2 wishes to turn NACIQI into more than a rubber-
3 stamp body.

4 It is really shocking that after more
5 than a year the Department has still made no
6 final decision on the appeal of an accreditor
7 that is repeatedly being found out of compliance
8 and unable to hold the institutions or the
9 accreditor accountable.

10 Every month that passes without a
11 final decision, students continue enrolling at
12 ACICS-accredited schools, not knowing that their
13 institution's accreditation status is in
14 jeopardy.

15 Thank you very much for your work and
16 for the opportunity to comment today.

17 CHAIR KEISER: Thank you, Mr. Convoy.
18 Bernie, are you there yet? The third person
19 would be Dr. Embry, are you available?

20 B. FRYSHMAN: Hello, Arthur?

21 (Simultaneous speaking.)

22 CHAIR KEISER: Bernie, you have three

1 minutes.

2 B. FRYSHMAN: Thank you very much.

3 I have three brief comments which I
4 would like to share. I'd like first of all to
5 express my appreciation to the Department of
6 education for the elements of flexibility which I
7 found in the accreditation handbook.

8 On Page 3 in the revised 2020 handbook
9 we read an Agency can provide additional files it
10 believes offer a more relevant example of its
11 work.

12 This refreshing openness and
13 flexibility also characterizes the Department's
14 guidance with respect to COVID-19 on Page 11 of
15 the handbook. This brings me to my second
16 comment.

17 I would respectfully suggest that the
18 Department review all of its regulations with an
19 eye to encouraging accrediting bodies to address
20 compliance in the manner which they attest, even
21 if it happens different from the Department's
22 prescription.

1 In a universe as complex and varied as
2 the world of accreditation, we can't expect that
3 regulations can be addressed in the same way to
4 all accrediting bodies. My third comment is
5 addressed to the Members of NACIQI and to Members
6 of the Department as well.

7 The realities of higher education
8 changed under COVID-19 and continue to change.
9 The challenges facing accreditors similarly
10 change.

11 I believe it's extremely important for
12 there to be informal, friendly, and cooperative
13 conversations between NACIQI Members, the
14 Department's rules, and the Agency leaders.

15 Of this in the past and I simply want
16 to reiterate that the recognition conversation
17 between the Department and NACIQI is usually
18 stilted.

19 Both NACIQI and other agencies would
20 benefit immensely from that kind of friendly and
21 informal interaction I am suggesting.

22 Just in passing, today's conversation

1 that NACIQI had on the various policy issues is
2 very, very interesting and I suspect that Members
3 of the accreditation world could benefit
4 immensely from that kind of conversation.

5 There isn't that opportunity for the
6 easy interaction, the exchange of ideas, the
7 proposal of changes and so forth that is so
8 useful to give an element of reality to
9 immediacy, I should say reality as well, to
10 Members of NACIQI and to the community at large.

11 It's just a suggestion and I thank you
12 very much for the opportunity to comment.

13 CHAIR KEISER: Our third presenter is
14 Dr. Embry. You have three minutes.

15 T. EMBRY: Thank you very much. Good
16 morning, fellow educators. It is wonderful to be
17 with you all. My name is Dr. Tessa Embry. I co-
18 founded Santa Monica Embry University.

19 I will briefly talk about the
20 necessity to urgently support alternative higher
21 education reform.

22 Let me begin by congratulating the

1 Department of Education on serving the billions
2 and millions of educators, students, and families
3 in the United States of America.

4 Your contributions are making a
5 difference in society and I am grateful for this.
6 During the pandemic, there was a major transition
7 in education where most education companies and
8 businesses were switching to remote learning.

9 The innovation of virtual inventions
10 prospered which altered the way that we learn,
11 interact, exchange, communicate, and serve one
12 another. We all have received a better way of
13 learning.

14 Loving one another as you love
15 yourself, love makes us come together to support
16 and utilize alternative accelerated higher
17 education which I am a product of.

18 A little about my story, I and my
19 brother were homeschooled by my mom, a retired
20 military single mom officer who supported and
21 loved higher education and learning.

22 I was enrolled in college at 11 years

1 old, got a bachelor's degree at 14 years old, a
2 master's degree in psychology at 16, and a
3 doctorate degree in business at 19.

4 I have been through most education
5 courses and careers in colleges so I have been
6 blessed to have the opportunity to experience
7 education in a wonderful way. I was very eager
8 and excited to learn fast.

9 Having the ability to increase in
10 learning was a blessing because it instructed me
11 to help others who are willing to learn as well.
12 There were many subtle changes that occurred
13 during the pandemic that made education more
14 unaffordable, unattainable, and unachievable.

15 Families became discouraged and
16 disconnected, educators were being exhausted with
17 long hours of teaching, and students were not
18 achieving their educational goals because of the
19 new academic rigor and retention barriers that
20 were allowed to slow them down.

21 The results were catastrophic. There
22 have been higher drop-outs, economic crash, lower

1 jobs and productivity and divided families were
2 forced to find a better education.

3 To be quite honest, most families and
4 student all over the United States and abroad
5 want to be able to achieve their educational
6 goals to become better citizens and contribute to
7 their family and society in a good way.

8 So, we started work together with the
9 Department of Defense and Department of Education
10 to establish Santa Monica A Embry University that
11 will make education affordable, achievable, and
12 accessible with military and civilian students.

13 Our goal is to make 100 percent
14 graduation rates, 100 percent job satisfaction,
15 and 100 percent family satisfaction as well so
16 people can have their accredited degrees and
17 certificates in college.

18 So, my biggest request is that the
19 accreditation panel considers to support these
20 efforts and contain to say yes to leading
21 alternative higher education and reduce the
22 academic rigor and start to put education back in

1 the hands of the students where they can be able
2 to attend their education courses without that
3 additional layer of extra games and smoke and
4 mirrors.

5 CHAIR KEISER: Thank you.

6 T. EMBRY: I encourage them to keep
7 trusting and alerting. God bless all of you.
8 Thank you.

9 CHAIR KEISER: Thank you for your
10 comments.

11 That brings us to the end of our
12 policy discussion and one other thing I want to
13 bring up and a number of you have mentioned that
14 we really do need to meet in person.

15 It's an important part of what we do
16 as a Committee and get to communicate directly.
17 And I just want to make sure that we're all in
18 agreement that hopefully February we will
19 recommend to the SDO that we do meet in person
20 for the winter meeting.

21 Does anybody disagree with that?

22 George, if you would communicate that we have

1 agreement that we would like to meet in person?

2 G.A. SMITH: I most certainly will.

3 Are you still open, just for clarification, to
4 the hybrid model which is what we were looking
5 into?

6 CHAIR KEISER: The problem is the
7 Committee is together. We can certainly
8 broadcast. Again, the technology may be
9 expensive, I don't know, that would be the SDO's
10 decision.

11 G.A. SMITH: We can't do anything
12 counter to departmental policy but I'll certainly
13 make a very strong note included with the SDO
14 with other recommendations.

15 CHAIR KEISER: This would be the end
16 of my participation in the meeting. I wish you
17 the best for the rest of the day, I look forward
18 to seeing you all in February.

19 We're going to break now until 1:00
20 p.m., at which point you are going to review the
21 Southern Association of Colleges and Schools.
22 Please if you are not recusing yourself, please

1 be there because we will need the quorum.

2 VICE CHAIR PRESSNELL: Art, have they
3 determined who is going to chair that session?

4 CHAIR KEISER: According to George,
5 Jill has put her name forward but you guys will
6 be able to elect a Chairman for that particular
7 meeting as Claude and I are both recused from
8 this discussion.

9 B. SHIREMAN: I wanted to ask about
10 the time. You said 1:00 p.m., the agenda had
11 lunch from 12:00 p.m. to 12:30 p.m. and I'm
12 wondering whether we should start at 12:30 p.m.
13 just given the volume.

14 CHAIR KEISER: I have the updated
15 agenda, it doesn't have it.

16 B. SHIREMAN: Maybe I'm wrong.

17 CHAIR KEISER: No problem, originally
18 it was scheduled for 1:00 p.m. George, what's
19 your pleasure?

20 G.A. SMITH: That's the thing, it's
21 really your pleasure. We took the time off
22 because I think you all were not necessarily

1 pleased with the 30 minutes lunchtime. We can do
2 that, it looks like we can have 45 minutes if we
3 start it at 12:30 p.m.

4 It's really up to you, we just need to
5 know before we break so people know. So, just
6 make a decision, do you want to come back at
7 12:30 p.m. or 1:00 p.m. so we can leave around
8 4:30 p.m.?

9 M. FREEMAN: 12:45 p.m. and give us an
10 hour.

11 G.A. SMITH: Is that okay with
12 everyone?

13 (Simultaneous speaking.)

14 K.S. ALIOTO: 12:30 p.m., let's get
15 out of here as soon as possible.

16 CHAIR KEISER: I'm going to make an
17 executive decision to go with Zakiya. We'll go
18 with 12:45 p.m. and that puts us between the 1:00
19 p.m. and the 12:30 p.m. That will be my last
20 executive decision before the end of the meeting.

21 Have a great meeting and good luck and
22 it should be interesting.

1 K.S. ALIOTO: Thanks to you and Claude
2 for your leadership of the meeting, and Wally.

3 CHAIR KEISER: Thank you, Kathleen, I
4 appreciate everybody, I have to say you folks
5 really worked. I thought the questioning, your
6 mastery of the information that was presented was
7 exceptional. Again, congratulations to the whole
8 Committee.

9 K.S. ALIOTO: I vote for Jim.

10 J. DERBY: I'm not wedded to this, it
11 looks like there was a vacuum and no leadership,
12 I'm willing to do it but if there's anybody else
13 that wants to step up, I'm just fine with that.

14 G.A. SMITH: We'll come back at 12:45
15 p.m.

16 (Whereupon, the above-entitled matter
17 went off the record at 11:49 a.m. and resumed at
18 12:45 p.m.)

19 G.A. SMITH: Okay, welcome back to
20 today's NACIQI meeting. Before we begin, we need
21 to elect a temporary chairperson, so can I -- at
22 this time, I'd like to open the floor for

1 nominations.

2 W. BOSTON: I nominate Jill Derby.

3 B. SHIREMAN: I will second that.

4 G.A. SMITH: Very good. It's been
5 moved and seconded for Jill Derby to serve as the
6 chair. Are there any other nominations? If not,
7 we'll take a vote. How do you vote, Wally
8 Boston?

9 W. BOSTON: I vote in favor of that.

10 G.A. SMITH: Mary Ellen, how do you
11 vote?

12 M. E. PETRISKO: Yes.

13 G.A. SMITH: Hall-Martin?

14 M. HALL-MARTIN: Yes.

15 G.A. SMITH: Jennifer Blum?

16 J. BLUM: Yes.

17 G.A. SMITH: Bob Shireman?

18 B. SHIREMAN: Yes.

19 G.A. SMITH: Steven?

20 S. VAN AUSDLE: Yes.

21 G.A. SMITH: Ronnie?

22 R. BOOTH: Yes.

1 G.A. SMITH: Kathleen?

2 K.S. ALIOTO: With pleasure.

3 G.A. SMITH: Yes, and Zakiya?

4 Z. SMITH ELLIS: Yes.

5 G.A. SMITH: All right, excellent, and
6 Jill, I suspect you would vote yes as well. I'm
7 going to turn the meeting now over to you.

8 J. DERBY: Okay, thank you, and thanks
9 to my colleagues. I'm happy to serve in this
10 temporary capacity. Let me begin by welcoming
11 everybody here and we are going to be reviewing
12 the Southern Association of Colleges and Schools
13 Commission on Colleges this afternoon.

14 Let me begin by reading and reviewing
15 our standard review procedures. We begin with
16 the primary readers introducing the agency and
17 their application. Then we go to the department
18 staff which provides a briefing for the
19 committee.

20 Then the agency representatives
21 provide their comments. That's followed by
22 questions by NACIQI, followed by response and

1 comment from the agency. Following that, we have
2 third-party comments, followed by the agency's
3 response to third-party comments.

4 Then we have the department staff
5 responds to agency and third-party comments as
6 needed, and finally, the discussion and the vote.

7 With that, we have as primary readers
8 Wally Boston and Mary Ellen Petrisko, and
9 department staff is Dr. Nicole S. Harris. So,
10 let's begin then with Dr. Harris?

11 N. HARRIS: Okay, did the readers want
12 to introduce --

13 J. DERBY: I'm sorry.

14 N. HARRIS: Okay.

15 J. DERBY: No, I'm sorry.

16 M. E. PETRISKO: I will introduce the
17 agency.

18 N. HARRIS: Okay.

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

20 Okay, and good afternoon. So, the Southern
21 Association of Colleges and Schools Commission on
22 Colleges or SACSCOC is an institutional

1 accreditor and Title IV gatekeeper, accrediting
2 approximately 800 degree-granting institutions in
3 11 southern states in the United States, as well
4 as institutions in Latin America and some
5 additional international locations.

6 As is noted on their website, the
7 Commission now also accepts applications for
8 membership from domestic institutions in the 39
9 states outside of the southern region.

10 The agency's accrediting activities
11 include the pre-accreditation and accreditation
12 of institutions offering associates,
13 baccalaureates, masters, and doctoral programs.
14 SACSCOC was first recognized in 1952. The last
15 full review of the agency was conducted at the
16 NACIQI meeting held in June 2017.

17 The agency completed a compliance
18 report required at the time of that review, and
19 department staff and NACIQI recommended at its
20 June 2019 meeting that the agency's recognition
21 be renewed for three years. It was at that time
22 recognized for three years. Thank you.

1 N. HARRIS: Good afternoon, Madam
2 Chair and members of the committee. For the
3 record, my name is Dr. Nicole S. Harris and I am
4 providing a summary of the renewal petition for
5 the Southern Association of Colleges and Schools
6 Commission on Colleges, also referred to as
7 SACSCOC or the agency, a Title IV institution or
8 accreditor currently recognized by the
9 department.

10 The department staff's recommendation
11 to the senior department official is to renew the
12 agency's recognition as a nationally recognized
13 accrediting agency at this time, subject to the
14 submission of a compliance report due in 12
15 months and a review and decision on the
16 compliance report.

17 In the event that the recognition is
18 continued following a decision on the compliance
19 report, the period of recognition will not exceed
20 five years from the date of the decision of the
21 renewal of accreditation issued by the senior
22 department official.

1 In addition, department staff
2 recommends the senior department official to also
3 require a monitoring report from the agency with
4 documented evidence for the substantially
5 compliant sections of the petition within 12
6 months of an SDO decision.

7 Department staff would initiate a mid-
8 cycle review in accordance with 34 CFR 602.33 if
9 the monitoring report does not demonstrate the
10 agency's compliance.

11 The staff recommendation is based upon
12 my review of the agency's renewal petition,
13 supporting documentation, and observations of the
14 board of trustee and annual meeting virtually in
15 2021 and in person in June 2022, board of trustee
16 training in April 2022, and evaluation site
17 visits consisting of the reaffirmation committee
18 virtual follow-up and special committee visits in
19 April 2021 and February through April of 2022,
20 along with a file review conducted from March
21 through June of 2022.

22 Based upon the review of the response

1 to the draft staff analysis, supporting
2 documentation, observations, and follow-up
3 communications with the agency, department staff
4 has identified issues that remain in the final
5 staff analysis pertaining to organizational and
6 administrative requirements, required application
7 of standards, and required operating policies and
8 procedures of the petition.

9 It should also be noted that the
10 agency has provided a request to the department
11 to extend recognition to the agency's executive
12 council and an expansion of scope to include
13 direct assessment within the agency's scope of
14 recognition.

15 Although not reflected in the
16 requested scope of recognition in the final staff
17 analysis, this request is reflected in
18 602.15(a)(5) and 602.16(d) in the petition.

19 Thus, the agency's scope of
20 recognition would read, the accreditation and
21 pre-accreditation candidate for accreditation of
22 degree-granting institutions of higher education

1 in Alabama, Florida, Georgia, Kentucky,
2 Louisiana, Mississippi, North Carolina, South
3 Carolina, Tennessee, Texas, and Virginia,
4 including the accreditation of educational
5 programs offered via distance and correspondence
6 education and direct assessment of these within
7 these institutions.

8 The accreditation status of these
9 institutions and their recognition extends to the
10 SACS board of trustees, executive council, and
11 the appeal committee of the collegiate college
12 delegate assembly on cases of initial candidacy
13 or initial accreditation, and for continued
14 accreditation of candidacy upon the SDO's
15 decision.

16 This concludes my presentation. There
17 are agency representatives present today and they
18 will be happy to respond to the committee's
19 questions. Thank you.

20 B. WHEELAN: Shall I begin?

21 W. BOSTON: Sure.

22 B. WHEELAN: Thank you. Greetings to

1 you all, to you, Madam Chair, members of NACIQI,
2 and members of the department staff. My name is
3 Belle Wheelan, and for 17 years, I have served as
4 the president of the Southern Association of
5 Colleges and Schools Commission on Colleges.

6 With us today is Dr. Rebecca Maloney,
7 who is the academic dean at Notre Dame Seminary
8 in New Orleans, Louisiana, who chairs the SACSCOC
9 board of trustees.

10 There's Rosalind Fuse-Hall, who is the
11 director of our legal and governmental affairs
12 and commission support area. She's been with the
13 commission five years as a lawyer and a former
14 college president with more than 30 years'
15 experience in higher education.

16 And at some point hopefully joining us
17 is Dr. Alexi Matveev, who is our director of
18 research and training. He has been with the
19 commission for ten years and has more than 20
20 years working in the areas of assessment.

21 He is caught in one of those plane
22 travel delay things that half the universe is

1 experiencing lately, so hopefully he will be able
2 to come on and more thoroughly answer any
3 questions you have about assessment that either
4 Roz or I can't answer.

5 I would ask that our chairman make her
6 opening remarks.

7 R. MALONEY: Thank you, Dr. Wheelan.
8 I am Dr. Rebecca Maloney and I serve as the chair
9 of the SACSCOC board of trustees.

10 Prior to serving as chair, I served as
11 the vice chair of the board and I've been a
12 member of the board since 2018. I've also
13 participated as a peer evaluator since 2012,
14 serving on 16 review committees.

15 Our board structure is very inclusive,
16 beginning with the college delegate assembly
17 comprised of the CEOs of each member institution.
18 The assembly approves the principles of
19 accreditation, the fees, and elects the 77-member
20 board of trustees.

21 The board reviews the accreditation-
22 related cases and renders decisions about pre-

1 accreditation, initial, and continued
2 accreditation, as well as monitors institutions
3 for noncompliance and/or places institutions on
4 sanctions when there is significant
5 noncompliance.

6 Our 13-member executive council meets
7 three times a year to manage the operational
8 business of the organization. That council
9 reviews and recommends policies to the board for
10 their approval.

11 The council approves the annual
12 budget, evaluates the president, coordinates the
13 nomination process for board vacancies in their
14 respective states, as well as approves selected
15 types of substantive changes.

16 As you can see, SACSCOC is an
17 organization that is heavily driven by the
18 membership. We collaborate with the president
19 and her staff.

20 Recommendations related to
21 accreditation activities is a two-way street with
22 board members suggesting areas for further study

1 based on feedback that we receive from colleagues
2 in our respective states, and we review the
3 recommendations for policy revisions or new
4 policies that the staff generates. This
5 reciprocal relationship creates a solid
6 foundation for the overall work of SACSCOC.

7 As the academic dean of curriculum and
8 instruction and director of institutional
9 effectiveness at a small seminary with a mission
10 to prepare men for the priesthood in the Roman
11 Catholic Church, our institutional voice is heard
12 and valued in the accreditation-related
13 activities of the commission.

14 Even though our institution does not
15 participate in Title IV programs, I appreciate
16 the continuous improvement process at the root of
17 their accreditation-related activities.

18 I've been a peer evaluator and worked
19 with institutions that are similar to mine,
20 evaluators receiving training to ensure
21 consistency in the rigor that we apply in our
22 reviews, and our work is shepherded by the

1 assigned vice president that provides
2 institutional memories of how similar matters
3 have been treated in other cases, as well as
4 ensuring consistency with our work at that
5 moment. This is an incredibly unique element
6 among all of the formal regional accreditors.

7 As a peer not from my same state,
8 avoiding conflicts of interest, but with other
9 institutions with similar enrollments and
10 missions, I understand the challenges and
11 opportunities that these campuses have to remain
12 compliant with the principles of accreditation,
13 our review function as a conversation starter
14 with institutions that have not achieved
15 compliance.

16 Further, evaluators respect the
17 confidentiality of the information that is shared
18 among other evaluators and the members'
19 institutions throughout the review process, and
20 the learning doesn't stop there. As an
21 evaluator, sometimes I learn how good it is I
22 have it at my institution.

1 In conclusion, I am grateful for the
2 support provided by SACSCOC staff during these
3 reviews, but I truly value the interaction with
4 my colleagues, the peers that I interact with
5 during committee reviews of various institutions,
6 as well as those that volunteer to serve as board
7 members.

8 I'm happy to answer any questions
9 related to the peer review process or the
10 governing structure of the SACSCOC board of
11 trustees. I would now ask Dr. Wheelan to offer
12 her comments.

13 (Audio interference.)

14 B. WHEELAN: -- department for 70
15 years as a regional accreditor and now as an
16 institutional accreditor with over 779 member
17 institutions, 753 of which participate in Title
18 IV programs.

19 We take our role as quality assurance
20 very seriously. We ensure the quality -- I'm
21 sorry. Ensuring the quality means having clear
22 standards that guide the work of the commission,

1 as well as aligns with the expectations and
2 requirements of applicable federal regulations.

3 Per our bylaws and standing rules, we
4 maintain the principles of accreditation that
5 serve as our standards. More importantly, these
6 standards are regularly reviewed and updated.

7 We did a comprehensive review between
8 2015 and 2017, so the current edition of our
9 principles went into effect January '18. They
10 were developed to ensure that member institutions
11 were aware of the changes that we had, and so we
12 held town hall meetings in each state on campuses
13 and in other meeting locations with member
14 institutions to explain the changes that had been
15 made.

16 We had reference materials on our
17 website and made hard copies available to each
18 institution. We held web-based workshops on
19 substantive change, which saw significant changes
20 during this process. We held web-based workshops
21 on sub change also.

22 We had a transitional plan or what we

1 called crosswalks for those institutions that
2 submitted their self-study under the previous
3 versions of the principles, but were reviewed
4 under the latest version of the principles,
5 giving institutions plenty of notice and
6 opportunity to adjust to the transition.

7 The new organization of the principles
8 reduced the redundancy of requests as well as
9 clarified expectations of demonstrating
10 compliance based on the data and feedback that we
11 received from evaluators, staff, and other
12 constituents since the previous review.

13 During that review, we also added two
14 new standards, one, a Standard 4.2(g) which
15 required boards to do an annual, I'm sorry, a
16 regular self-evaluation, and the second was
17 Standard 12.6 which was related to student debt
18 that says the institution provides information
19 and guidance to help student borrowers understand
20 how to manage their debt and repay their loans.
21 This standard applies to all institutions,
22 whether or not they participate in federal loan

1 programs.

2 We recognize that for many of our
3 students, this was the first time they had large
4 amounts of money and did not always know what to
5 do with it or recognize that they had to pay it
6 back at some point.

7 Types of documentation submitted by
8 institutions in self-study during spring '19 and
9 '21 included mandatory loan counseling and
10 advising, prescreening and counseling
11 customization, freshman seminars, student
12 supplemental emergency aid programs, and policy
13 statements that were submitted.

14 The major change of the principles was
15 better organization of the core requirements and
16 standards based on feedback from the
17 institutional accreditation liaisons and peer
18 evaluators who worked with the standards and
19 their review of accreditation-related matters.

20 Moreover, we redesigned our website in
21 late 28 to facilitate the ease for users to find
22 information related to our process and

1 procedures.

2 SACSCOC is also data driven and we
3 have reviewed the IPEDS data as well as the
4 dashboard produced for NACIQI. We also regularly
5 review the college scorecards, National Student
6 Clearinghouse information, as well as our own
7 collected data.

8 Annually, member and candidate
9 institutions must submit an enrollment profile
10 and a financial profile. The information is
11 available to our staff through our data
12 management system. Further, each institutional
13 record on the SACSCOC website links to the
14 student achievement data for each institution.

15 Following each board meeting, our
16 Office of Research and Training reviews the most
17 cited standards and presents this information at
18 a staff meeting. The staff and I discuss the
19 results and provide additional information to
20 address any difficulties that we may notice from
21 the trends revealed in this review.

22 From the dashboard data that you

1 provided, we note three significant findings for
2 the 20 institutions with the lowest IPEDS
3 graduation rates.

4 More than half the schools have
5 relatively small shares of first-time full-time
6 college students, which is the basis for the
7 traditional IPEDS graduation rates. Thus, this
8 data is likely to be of limited validity and
9 might be misleading as an indicator of overall
10 institutional performance.

11 Secondly, a number of schools on the
12 list have relatively high proportions of low
13 socioeconomic students and/or minority students,
14 and it's a well-established fact that such
15 student populations have completion challenges.

16 And finally, most of the schools on
17 the list have open admission or are classified as
18 inclusive versus selective by the Carnegie
19 Foundation. Once again, it's well-established
20 that higher selectivity is correlated with higher
21 graduation rates.

22 However, SACSCOC reviews this data as

1 well as our own, and what this information
2 signals for us is the need to have conversations
3 with the institutions about what we're seeing.

4 Further, we note that many of these
5 same institutions, during the decennial or fifth-
6 year review process, are flagged for significant
7 noncompliance matters during our initial or
8 offsite reviews. We used this opportunity to
9 talk with institutions, especially in the areas
10 of student achievement and/or institutional
11 effectiveness.

12 Further, their assigned vice president
13 from our staff worked diligent with them to
14 understand what data they need to present to the
15 peer evaluators in order to demonstrate
16 compliance.

17 We view our work as an accreditor not
18 as one of a gotcha, but rather we actively work
19 with member institutions to ensure continuous
20 improvement in the quality of the academic
21 offerings at their institutions.

22 By continuous, we use the information

1 that we glean from working with our institutions
2 at the annual meetings, through information
3 shared during training of peer evaluators,
4 chairs, and new members of the board of trustees,
5 and at a special meeting we have called the Small
6 College Initiative to which we invite
7 institutions with fewer than 2,000 FTEs, as well
8 as all of our HBCUs.

9 Next, I'd like to comment on our
10 comprehensive and systemic approach to improving
11 completion rates across our member institutions
12 based on student achievement data.

13 Completion rates and institutional
14 effectiveness has been a top strategic focus of
15 SACSCOC since the '90s. From then until now,
16 improving completion rates based on student
17 achievement data has been goal number one in our
18 own organizational strategic plan.

19 In the plan, which runs from 2018 to
20 2023, our first goal is to maintain focus on
21 student learning and achievement, and we have two
22 objectives under that goal.

1 One is to continue developing and
2 fine-tuning expectations regarding the completion
3 and other measures of student success based on
4 the data, and second, to provide data reports and
5 relevant professional development opportunities
6 to stimulate the sharing of best practices for
7 enhancing student learning and achievement.

8 In the 2016 to 2018 time frame for
9 that strategic plan, one of the objectives was to
10 provide institutions with their respective
11 completion data using four different metrics.

12 They were able to choose either the
13 traditional IPEDS data, what was then the new and
14 improved outcomes IPEDS data which included part-
15 time and transfer students, our own graduation
16 metrics with data they reported directly to us,
17 or data from the National Student Clearinghouse.

18 They were asked to identify one of
19 those four metrics as a key student completion
20 indicator for tracking and monitoring purposes.

21 Then in '17 and '18, we revised the
22 student achievement core requirement, which for

1 us is core requirement 8.1, explicitly requiring
2 institutions to identify, justify, evaluate, and
3 publish goals and outcomes from multiple measures
4 of student achievement appropriate to their
5 mission, student demographics, and program
6 offerings.

7 For the purposes of this standard,
8 multiple measures refers to several distinct
9 outcomes, not multiple ways of measuring the same
10 one.

11 And in 2017-2018, we expanded the
12 focus of our quality enhancement plan to include
13 success and completion in addition to just
14 identifying student learning outcomes.

15 This stimulated sustained
16 institutional efforts to develop, implement, and
17 report on the impact of institutional strategies
18 to facilitate student achievement.

19 And in 2018-19, we clarified the
20 guideline that we have called interpretation of -
21 - core requirement 8.1, which is student
22 achievement, to require member institutions to

1 identify a graduation rate metric.

2 They may not indicate or designate a
3 new indicator until their subsequent
4 reaffirmation cycle, but they also had to prepare
5 a compliance certification that included
6 information using that chosen indicator when
7 providing a narrative and supporting
8 documentation for the standard.

9 Institutions whose graduation rates
10 fall below appropriate and acceptable
11 institutional targets had to discuss ongoing
12 institutional strategies on ways to improve those
13 numbers.

14 Institutions which only serve graduate
15 and professional students were not asked to
16 select an indicator, but they were expected to
17 address graduation rates as part of their
18 discussions on student achievement.

19 Explicitly requiring setting and
20 justifying thresholds of acceptability or minimum
21 performance standards in addition to those target
22 goals for identified measures of student

1 achievement was a requirement for the
2 institutions. Additionally, they had to identify
3 improvement plans if their performance fell below
4 their own identified thresholds.

5 We also required that they
6 disaggregate graduation data on a selected key
7 student completion indicator by appropriate
8 relevant student subpopulations like gender,
9 ethnicity, and socioeconomic level.

10 They were then asked to analyze that
11 disaggregated completion data and identify
12 concrete focused improvement plans if the
13 analysis revealed that the gaps in performance by
14 student population existed.

15 In reviewing the data of the 25 lowest
16 performing institutions, I'd like to point out
17 the progress that has been made by them and the
18 IPEDS graduation rate is trending upward for all
19 populations of our member institutions that
20 participate in IPEDS, especially for
21 baccalaureate institutions and institutions with
22 graduation rates of 25 percent or lower as

1 identified in 2016 when we first started using
2 these numbers, and they've also trended upward
3 for associate degree granting institutions with
4 graduation rates of 20 percent or lower
5 identified in 2016.

6 For example, the graduation rate
7 overall has increased from 39 percent in 2016 to
8 43 percent in 2010, I'm sorry, 2020, which is a
9 ten percent increase of steady improvement over
10 the last five years.

11 The IPEDS graduation rates for
12 baccalaureate institutions and institutions with
13 graduation rates of 25 percent or lower
14 identified in 2016 has gone from 18 percent to 24
15 percent, which is a 33 percent improvement over
16 the last five years.

17 And the graduation rates for associate
18 institutions with graduation rates of 20 percent
19 or lower in 2016 went from 15 percent to 25
20 percent, which is a 66 percent improvement.

21 Now, we do understand that there is
22 certainly room for improvement in all of those

1 levels, but our sustained focus on completion and
2 student achievement has led to steady and
3 sustained trends in the right direction.

4 Next, I'd like to discuss our work in
5 the area of substantive change. In reviewing our
6 petition, the substantive change policy was
7 revised to indicate all specific types of
8 substantive changes noticed in the latest Federal
9 Register.

10 This change was made commensurate with
11 the effective date of the new federal regs, but
12 the procedure section was still in progress given
13 the areas being defined by the department.

14 The other challenge was that the
15 information was outlined in the December 2020
16 Federal Register, but we submitted our report in
17 September of 2020, so we were behind and had to
18 catch up.

19 Once the information was provided,
20 then the procedure section of our policy was
21 updated and improved for members. It included an
22 at-glance chart for each type of substantive

1 change, and note that we have 50 types of
2 substantive changes but the department has only
3 identified a handful.

4 The update also indicates whether
5 there's a fee required, whether there's
6 notification, or approval, or both required,
7 whether a committee visit is required, and
8 whether the type of change is subject to
9 substantive change restrictions.

10 Well over 10,000 sub changes were
11 submitted during this recognition cycle and they
12 were reviewed either by our executive council or
13 by the board of trustees, and so you can imagine
14 trying to send the file to Dr. Harris was a
15 challenge to say the least, so we're looking at
16 trying to find a different way to send that to
17 her.

18 There's been an explosion of reviews
19 also related to the initial approvals of off-
20 campus instructional sites by extensive reviews,
21 which is a new requirement of the policy.

22 Extensive reviews are now required if,

1 at the time a site prospectus is submitted, an
2 institution has fewer than two sites approved
3 under the extensive review criteria, or if an
4 institution has not successfully completed or at
5 least one reaffirmation of accreditation, or if
6 an institution is on sub change restriction.
7 That's means they're on probation or heightened
8 cash management.

9 So, all of these exceptions to the
10 rules are complex, and so we're trying to find a
11 way to lay it out so that we can get it to her.

12 I mentioned this because some of the
13 challenges that Mr. Bounds mentioned on the first
14 day regarding technology were indeed our
15 challenges. We were excited when the process was
16 changing so that Dr. Harris could have come and
17 done her file review onsite, and then COVID hit,
18 and so we were back to sending pages.

19 And those of you who were on NACIQI
20 last time we were here might remember that we
21 sent in over 800,000 pages of paper, which is
22 cumbersome, and information gets lost, and so we

1 were back to that this time, so we did have some
2 technological challenges.

3 When we sent in the compliance
4 certification initially, somehow a copy of our
5 principles didn't get submitted, and so 85
6 percent of our, of the items, we were found out
7 of compliance because the principles weren't
8 there.

9 So, we have had those kinds of
10 challenges, but Dr. Harris has been a trouper and
11 worked with us through all of them. I can't
12 imagine what the other institutions are going
13 through, but we are truly thankful for her time,
14 and energy, and guidance through this particular
15 process.

16 And to Mr. Bounds, we appreciate all
17 of the responses to our phone calls and emails as
18 we tried to work this out. We even had to get
19 Dr. Harris to call her IT person to talk with my
20 IT person so people who both spoke IT could get
21 this up and running.

22 This was also, for us, a challenge

1 with the handbook coming out after we had already
2 submitted our application because we had to go
3 back and redo tons of stuff.

4 There were also some things that we
5 weren't clear about because this was Roz's first
6 time working with a compliance certification, and
7 so when we got the report back, our stomachs fell
8 and hearts went into hyperdrive, but I feel very
9 good that the items that are missing seem to be
10 more administrative than they are policy or
11 procedure.

12 So, I assure you that we will get this
13 information in long before the 12 months that are
14 being recommended and we'll be glad to try to
15 answer any questions that you all have right now.

16 W. BOSTON: Thank you, and thank you
17 for such a thorough presentation. You may have
18 answered some of my questions in advance.

19 So, specifically looking at the
20 documents that are not yet provided, I think that
21 there's 104 criteria and that you all need to
22 provide documentation on 28 of them, and you're

1 associating this primarily with the changes in
2 guidance in the handbook in December of 2020
3 after you had submitted your initial application
4 in September?

5 B. WHEELAN: Some of them had to do
6 with that, Mr. Boston. One of the problems, for
7 example, was asking for information about
8 substantive changes and providing documentation
9 for five years of substantive changes.

10 We thought that we needed
11 documentation for five years for all 50 of our
12 sub changes and we were not able to get that in
13 in time, and then after the fact, we found out,
14 no, it was only for the ones that were for the
15 feds, so that's the biggest piece of the sub
16 change one.

17 One of the requests had to do with a
18 document that we no longer have. It was related
19 to an institution that was in a position to read
20 the disclosure statement that was going to be put
21 up before it was posted, and once they approved
22 it, then we deleted it, you know, from the email

1 account. It was not a part of any formal
2 application.

3 We had one question for which we had
4 no response because we didn't have -- we weren't
5 in the situation to -- so it's things like that
6 that were there, but I'm just saying that a lot
7 of the challenges we had were in getting the
8 information to Dr. Harris.

9 She was kind enough to give us an
10 extension at the end of the process, but then we
11 still had problems with her finding where the
12 documentation was, so it was just a comedy of
13 errors on the one hand.

14 W. BOSTON: Okay.

15 J. DERBY: Wally, before you go on, I
16 want to make a comment. I apologize for our
17 network failure at that inappropriate time, but I
18 realize that one of the pieces we skipped is
19 there were no questions for the analysts.

20 So, I wanted to invite you and Mary
21 Ellen, who are the primary readers here, to
22 address any questions to Dr. Nicole during this

1 time as well as to the agency. Thank you.

2 W. BOSTON: Sure, I just have one
3 question for Dr. Nicole which relates and for the
4 agency can respond. It relates to the 602.14
5 category of agency and there's quite an elaborate
6 discussion between the two entities, SACSCOC and
7 Cognia. I'm just going to probably butcher that
8 pronunciation.

9 B. WHEELAN: Cognia.

10 W. BOSTON: Okay, and at the -- as I
11 looked at the stream of documentation, which
12 evidence and documentation is always great, I'm
13 glad I didn't have to look at 800,000 pages.

14 But it appears that there's some
15 missing documentation on recusal from committee
16 and board actions with, you know, specific board
17 members. I guess the documentation has not yet
18 been submitted or is it these things really
19 happen verbally and the minutes for the recusals
20 happening aren't available?

21 R. FUSE-HALL: Dr. Whelan, I'm happy
22 to address that question. No, we always -- each

1 of our board members are required to submit a
2 signed recusal form, and so we have subsequently
3 submitted many of those missing recusal forms in
4 the file review, so that has been addressed.

5 We work every board meeting to ensure
6 that we have the signed recusal forms from each
7 one of our board members. I keep a running count
8 of that information always, and we keep those in
9 a separate file, electronic file.

10 So, we believe that we've addressed
11 that, but we're happy to go back and look and
12 ensure that that is present for each and every
13 one of the meetings that we've submitted
14 information for.

15 N. HARRIS: Can I speak to that,
16 please? I'm sorry.

17 W. BOSTON: Yes, I'd like to hear it.
18 Yes, thank you.

19 N. HARRIS: Yes, so let me be clear
20 that the information in the petition and the
21 information in the file review are separate from
22 what is presented.

1 The information in the petition and
2 what's cited in the petition and the recusal
3 forms, in the narrative, it states specifically
4 that the recusal forms that were not included in
5 the petition, they were not included in the
6 actual file review.

7 That's the reason why it was cited as
8 a compliance issue here. The file review
9 documentation was still not completed, so there
10 are some issues that are still there.

11 An email was sent to the agency on
12 June, I'm sorry, June 1, instructing them of what
13 is still outstanding in the file review
14 documentation, as well as the information that is
15 in the petition, which again, I have explained to
16 the agency that that was separate.

17 I just want to double back to the
18 submission of information. This agency has had a
19 lot of documentation, which is true, but I do
20 want to clarify that the system issues that
21 they're explaining, there were no errors sent to
22 me except for one that was sent on a Saturday to

1 another analyst.

2 But the errors that they were
3 receiving in the system, that is something that
4 wasn't documented, but we tried to do our best to
5 assist them, and we've had several meetings with
6 our IT as well as our technician analysts to
7 assist them. So, we have worked long hours to
8 try and get that fixed, but the fix wasn't on our
9 end as the department.

10 W. BOSTON: Okay, and then as far as
11 the separate entity Cognia or Cognia, I'm not
12 sure how to pronounce it --

13 B. WHEELAN: Cognia.

14 W. BOSTON: Cognia. You're
15 comfortable that the documentation is there so
16 that there's clearly differentiation between the
17 two legal entities and which bodies we're
18 approving?

19 N. HARRIS: Right, well, with the
20 information that they provided in the narrative,
21 as well as the documentation outlining the
22 different, the evolution of Cognia, it satisfied

1 the explanation that they provided in the
2 narrative and as well as evidenced the separation
3 that they also cited in their years in existence.

4 W. BOSTON: Okay, thank you.

5 J. DERBY: Mary Ellen, do you have any
6 questions of Nicole and then we can move on?

7 M. E. PETRISKO: I do not. Thank you.

8 J. DERBY: Okay, good enough. Wally,
9 go ahead.

10 N. HARRIS: I think Herman had a
11 response to something I said earlier.

12 J. DERBY: Herman?

13 N. HARRIS: You're on mute.

14 H. BOUNDS: You answered the question,
15 so I don't have any.

16 N. HARRIS: Okay.

17 J. DERBY: Okay, good. Wally, go
18 ahead.

19 W. BOSTON: Okay, so --

20 B. SHIREMAN: Can I ask, just
21 procedurally, are we continuing with our, with
22 NACIQI members' questions of Dr. Harris or are we

1 going to agency and Dr. Harris combined?

2 J. DERBY: Well, let's -- I was going
3 to try to do this combined, but I don't know if
4 that works as well, and what we might want to do
5 is go back to questions for Dr. Harris. Again, I
6 apologize for the interruption.

7 I think let's allow Wally and Mary
8 Ellen any questions of Dr. Harris and then other
9 members of NACIQI asking Dr. Harris, and then
10 we'll move back to the agency. I think that's
11 the best way to proceed.

12 W. BOSTON: Thanks. I am finished
13 with my questions of Dr. Harris.

14 J. DERBY: Then, Bob, did you have a
15 question? Go ahead.

16 B. SHIREMAN: Yes, thank you, and
17 thank you, Dr. Harris, for the gargantuan project
18 that you took on here.

19 N. HARRIS: No problem.

20 B. SHIREMAN: I wanted to ask about
21 one of the items that was a problem. It was
22 notifying other agencies, 602.24(c)(4), and it

1 said -- and this was something that you did a
2 file, the file review on.

3 And I'm imagining, you know, I picture
4 a file review as you sitting in a room with no
5 windows and a bunch of file cabinets, and I don't
6 know if that's the case, but what you said in the
7 document was the documentation of notifications
8 during the recommendation period were not
9 readable. What did you mean they were not
10 readable?

11 N. HARRIS: Oh, sure, so the
12 information was provided in a box.com. It's a
13 network for sharing documents. The shared file
14 that was provided, when I clicked on it, it
15 wasn't a readable document.

16 So, those decisions at that time were
17 not readable for me to make a declaration as to
18 the actual outlined timelines within the criteria
19 were met.

20 B. SHIREMAN: Thank you so much. That
21 clarifies my picture of what was going on here.
22 I pictured like a blurred document, anyway, okay,

1 smeared with coffee or something, anyway.

2 N. HARRIS: Right.

3 B. SHIREMAN: So, this lengthy staff
4 review report has a number of circumstances where
5 it feels like there's some frustration where it
6 will say the word still comes up. It's like I
7 asked for something. It wasn't provided. It
8 still hasn't been provided. Again, it still
9 hasn't been provided.

10 In fact, I did a count and it was 75
11 times the word still was used in that way, which
12 just sounds really frustrating. And you
13 identified as one item 602. The question of
14 competency of the people at SACS is identified,
15 but it's really just described as just the, I
16 think it was naming the people on the appeals
17 panel or something like that.

18 This raises -- you know, there was
19 mention of technological issues, but the extent
20 of the problems raises questions about the
21 qualitative adequacy of staffing at the
22 department, as well as the administrative

1 staffing, 602.15(a)(1), which you did not
2 identify.

3 Is your review of both the competency
4 and the, as well as the administrative staffing
5 just quantitative? Basically, like are the items
6 there? Am I right in assuming that you don't do
7 a qualitative review of whether the people are
8 actually doing the job that they're supposed to
9 do?

10 N. HARRIS: I would disagree with that
11 because I do do the qualitative pieces through my
12 observations. When I do go onsite, the vice
13 presidents are there with the site visit teams
14 when I'm onsite, and I also was in person at a
15 board meeting, as well as I did a virtual one.

16 So, the roles that they list and the
17 staff that they have that they list in their
18 petitions, they are definitely working on their
19 behalf.

20 I just think in this instance, as I
21 cited in the petition, that for this instance and
22 the review of the petition information and the

1 secretary's criteria, I think that the persons
2 who were involved in that piece were just
3 unfamiliar.

4 B. SHIREMAN: Okay, great. Well, that
5 does raise an adequacy question for me, but I
6 really appreciate that you feel like they're
7 capable people.

8 N. HARRIS: Oh, the agency is very
9 capable of --

10 B. SHIREMAN: Right.

11 N. HARRIS: -- correcting the issues
12 that are listed in the petition and accrediting
13 the institutions that they have on file. The
14 issues that I raised are documentation wise
15 because, for the record.

16 And I think Jennifer mentioned earlier
17 during the policy discussion, you know, when
18 you're studying for a test, you want to have
19 everything that you need, and if someone refers,
20 I think it was Eubanks had mentioned that he went
21 back to petitions in the past to review.

22 And with this incomplete, you don't

1 have a closure of information or I don't have
2 documentation to pass to the SDO. If they're
3 reading the petition and want to refer to
4 documentation, that is not available.

5 B. SHIREMAN: Got it, thank you.

6 N. HARRIS: No problem.

7 J. DERBY: Is that it, Bob? Herman,
8 I wanted to go to you. Do you have some legal
9 clarification before I go onto Jennifer who is
10 next in sequence?

11 H. BOUNDS: No, I don't have a legal
12 clarification. I just wanted to go back. We
13 were, excuse me, we were discussing at one point
14 602.14(a). I believe it was category of agency.
15 I just wanted to make sure that everybody is
16 clear.

17 In the final staff report, we have
18 them as met in category of agency. I just didn't
19 want that to leave off like there was some, you
20 know, some remaining issue there, so I just
21 wanted to point that out.

22 J. DERBY: Okay, thank you. Jennifer,

1 you're next.

2 J. BLUM: Yeah, I mean, Bob covered a
3 lot of my ground, so I appreciate that. And, you
4 know, to me, my issue here, and I've been sort of
5 consistent this week, at the very start of the
6 week, you know, and sort of in my mind, and
7 Belle, you sort of spoke, Dr. Wheelan, you sort
8 of spoke to it, like administrative deficits in
9 your, you know, in what we're looking at versus
10 sort of what I view as substantive.

11 My issue is though when there's so
12 many administrative noncompliance, and I'm using
13 that term loosely, but, you know, not finishing
14 the task before today, it does raise a level of
15 concern to me about, you know, administrative
16 capability in effect, or competency, I think, is
17 the probably more accurate term.

18 And so, this question is actually for
19 Nicole, for Dr. Harris. The level of -- because
20 what's also important to me is like the
21 collaborative process, the best efforts piece.

22 I mean, we've been through a week

1 where we, you know, admittedly every agency has
2 had some of the same complexities and faced the
3 same challenges, albeit SACS is large, but even
4 in their small worlds, you know, they don't have
5 the same level of resources as SACS either, and
6 yet, you know, they meet the task.

7 And so, that's my struggle here and I
8 want to hear about sort of your perspective on
9 sort of best efforts at compliance, and
10 recognizing, of course, that they'll be back in a
11 year, but I do -- I kind of want to hear a little
12 bit about, you know, your comfort level with the
13 engagement over the last couple of years, because
14 they did have a couple of years here of process
15 to get everything together and that's my pause
16 here.

17 N. HARRIS: Well, to speak to that --
18 and thank you for your question. To speak to
19 that, I started communication with the agency in
20 March and July of 2020. We had communicated
21 about what to include in the petition.

22 I provided the dates and recognition

1 periods, you know, and what not to include such
2 as web links are not accepted in our system and
3 so forth, and also what information to include
4 for the department selected institution as well.

5 And upon receiving the petition, it
6 was more of a data dump as opposed to it really
7 being clarified in which area it should be put
8 in, and in some places, some things were
9 incomplete and so forth.

10 And after that point, we ended up
11 having subsequent meetings. I have met with the
12 agency at least seven times through the process.
13 I have provided subsequent clarifications.

14 I've provided individuals on the calls
15 to assist them with, as I stated earlier, the e-
16 recognition system, as well as the IT people here
17 at the department, provided them correspondence
18 also with the file review.

19 I listed each criterion and what was
20 missing and what was still needed, and as I was
21 explaining to Mr. Shireman, what was not
22 readable, and, I mean, I tried to be as explicit

1 as possible and went back to my professor days,
2 but I'm not sure if -- you know, I think time
3 might have run out of, timing on their end ran
4 out. We did have issues with multiple people
5 putting information in the system, which is not
6 the way the system works. One password is for
7 one person, and when you're uploading multiple
8 things at multiple times by different people, you
9 know, it kind of washes out some other things
10 that were in the system, so we had issues of that
11 sort.

12 I received questions. I received 13
13 questions in the month of April, I mean, I'm
14 sorry, in the month of March. So, I was very
15 responsive. I pride myself on customer service
16 as a public servant.

17 So, I tried to be responsive, but I'm
18 not sure what the disconnect was, but I have no
19 problem continuing to be patient and working with
20 the agency, but at some point, we had to have a
21 cutoff and --

22 J. BLUM: Got it.

1 N. HARRIS: -- the cutoff was our
2 final analysis submission deadline, so --

3 (Simultaneous speaking.)

4 J. BLUM: Thank you for that thorough
5 answer. I mean, I'll just say again on the one
6 hand, I'm sympathetic to, you know, the volume of
7 necessary documents, you know, and I appreciate
8 what Dr. Wheelan was saying about volume.

9 On the other hand, to be a large
10 agency by choice comes with the obligation of
11 being able to meet that demand for the
12 recognition process, and so, you know, therein
13 lies, I think, you know, more of the questions
14 for today overall, so thanks. Those are my
15 questions for now.

16 J. DERBY: Okay, Ronnie, you're next.

17 R. BOOTH: All right, thanks. Dr.
18 Wheelan, if I heard correctly, you earlier said,
19 you mentioned the number 800,000 pages, and based
20 on what Dr. Harris said and evidently what you
21 said, evidently some of those were not necessary,
22 so what if it was 400,000 pages?

1 My simple math tells me that, you
2 know, 400,000 pages, reading 40 pages an hour
3 would take Nicole five years of work to read
4 that, and we haven't even talked about what it
5 takes to identify, collect, collate, send, for
6 Dr. Harris to read and send back, you to read and
7 send back.

8 So, when I do my simple math, I'm
9 thinking it's not possible humanly, given the
10 resources we have, to actually do a thorough
11 review if everybody needs that kind of
12 documentation. It's just not physically possible
13 on the part of SACS on the part of the Department
14 of ED.

15 To get back to, you know, Jennifer's
16 question earlier, quality/quantity, it's quite
17 overwhelming to me, so I just have those
18 questions. Evidently, there are a number of
19 issues that need to be addressed. You're going
20 to address those in a motion. I mean, the staff
21 findings, I think, are reasonable.

22 But Dr. Wheelan, just from your

1 perspective, how in the world do we appropriately
2 improve confidence in what we're doing as an
3 agency and do it in such a way that makes it
4 humanly possible to actually review and come to a
5 serious conclusion?

6 Because I'm just feeling like our
7 system right now sets us up so that we cannot do
8 that, and I'm just curious, Dr. Wheelan, on your
9 thoughts.

10 J. DERBY: Ronnie, just before, and
11 Dr. Wheelan, before you answer that, I want to
12 keep us focused here. Right now, we've gone back
13 to questions of Dr. Harris.

14 R. BOOTH: Okay.

15 J. DERBY: And then we'll -- so if we
16 can put that question on hold for now, Ronnie,
17 and ask it -- because we're going to --

18 (Simultaneous speaking.)

19 J. DERBY: We're going to give Wally
20 and Mary Ellen the first opportunity to ask their
21 questions of the agency, so.

22 R. BOOTH: Well, I think that's a

1 legitimate question for Dr. Harris then --

2 (Simultaneous speaking.)

3 N. HARRIS: I can definitely respond.
4 Trust me, the hours are truly -- no hour was left
5 undone. I'll put it that way.

6 The only -- the biggest issue I had
7 was the fact that a lot of the documentation --
8 mind you, it was more than 800,000 documents this
9 time because a lot of the documentation, as I
10 noted in the petition, were not relevant to the
11 criteria that it was submitted to.

12 I've cited that on numerous occasions.
13 I don't know if Bob did a word search on that
14 too, but I noted in the petition that a lot of
15 the information wasn't relevant.

16 And it should also be noted that when
17 they submitted the petition in September of 2020,
18 their policies and procedures, 11 of them hadn't
19 been changed to adhere to the criteria that came
20 out July 1 of 2020.

21 Well, they were posted in November of
22 2019, but they went into effect July 1 of 2020.

1 So, 11 policies and procedures were revised and
2 two new policies were revised.

3 So, there was no way I could possibly
4 make a compliance determination in the draft
5 staff analysis if the policies had not been
6 provided and not been adjusted to meet the new
7 criteria.

8 So, the new policies were approved by
9 the executive council in March of 2022 in time
10 for the submission of the final staff analysis
11 and approved at the June board meeting I attended
12 in June of 2022.

13 So, again, you have to understand they
14 gave me an abundance of documentation, but some
15 were not relevant and the policies had not been
16 updated to reflect the new criteria.

17 R. BOOTH: And I get that. I remember
18 you saying that, Dr. Harris, but again, I think
19 if it was even half or a quarter, there's still
20 not enough time humanly for us to do, so I guess
21 that's --

22 There are issues to address, but

1 again, I ask the question. I think, I mean, it's
2 a regulatory or legislative question. Can we
3 actually do what it is we're trying to do given
4 the human limitations? And that doesn't make an
5 excuse for anybody. That's just saying --

6 N. HARRIS: Oh, no, I understand.

7 R. BOOTH: Yeah.

8 N. HARRIS: I understand.

9 J. DERBY: Good point.

10 N. HARRIS: Thank you.

11 J. DERBY: Good point. Kathleen, do
12 you have a question for Nicole?

13 K.S. ALIOTO: In my seven years on the
14 committee, I have been very impressed with
15 Nicole's work, and I always felt that when she
16 was in charge of an agency, we would really know
17 what was going on, so thank you, Nicole.

18 N. HARRIS: Thank you.

19 K.S. ALIOTO: My question is with all
20 of this brouhaha, why are you still suggesting
21 that we accredit this agency? I mean, we haven't
22 even gotten to some of the problems with the

1 agency or the student debt and the --

2 I mean, I think it's very admirable
3 that the agency is trying to work with changing
4 the nature and the results of some of their
5 institutions, but I'm wondering how you came up
6 with the decision that you have presented to us
7 to vote on?

8 N. HARRIS: Thank you, Kathleen. It's
9 always nice to see you. I wanted to speak to
10 that.

11 Again, this is documentation, and
12 their policy -- because of my observation of the
13 way they execute the policies, the new policies
14 that they've put in place to adhere to the July
15 1, 2020 regulations and the observations of the
16 policies that they have updated, but some that
17 haven't been included, I think that the agency is
18 still able to do the work of the secretary's
19 criteria and they've been doing the work.

20 I think their policies now reflect and
21 they've adjusted to make sure that the work
22 that's being done is adhering to the regulations

1 at this time, but the work of the agency has --
2 it's still going on regardless of the
3 documentation that they didn't provide. It is
4 available.

5 That's why I'm confident in my
6 decision for renew of recognition because the
7 documentation, once I have it and I'm able to
8 review it, I will be more comfortable in my
9 recommendation.

10 However, we do have the caveat that
11 they would have to come back for a 602.33
12 procedural review with you all if the information
13 is not satisfactory once I do review it.

14 I mean, some of it, I've seen and
15 heard it discussed at the meetings I observed,
16 but I need the documentation and the evidence to
17 look at it and analyze it thoroughly. Thank you.

18 J. DERBY: Thank you, Nicole. That's
19 helpful. Well, Wally, let's go back, and if
20 there are no further -- oh, Herman, it looks like
21 you have -- yeah, go ahead, please.

22 H. BOUNDS: Yeah, I just wanted to

1 reiterate something that Nicole said. You know,
2 we don't expect that we're going to see anything
3 from SACS that would indicate, you know, gross
4 negligence or that they are not a reliable
5 authority. We just don't think we're going to
6 see that.

7 Our problem is just that we need the
8 additional documentation to be able to make a
9 determination of, you know, of compliance in all
10 of the areas that we say they are noncompliant.
11 We need those documents that we didn't get just
12 to be able to review those.

13 And believe me, Nicole and I spent
14 many, many, many, many days, you know, before we
15 published the draft to discuss those things and,
16 you know, what we thought about each one of the
17 criteria that they didn't provide the
18 documentation for.

19 So, I think, you know, Nicole would
20 agree with me. We think that they now have an
21 idea based off our conversations of what they
22 need to provide, and I personally do not think

1 they will have any problem providing this
2 additional information.

3 It's just we could not have made
4 another recommendation more severe than what we
5 made because we just think that we just need that
6 additional documentation so that we can close the
7 loop on everything, and we couldn't do that
8 without that additional information.

9 But again, we don't have any reason to
10 believe that we're going to uncover some form of
11 gross negligence or something that would indicate
12 that the agency should not be recognized. We
13 just don't think that's going to happen.

14 J. DERBY: Thank you, Herman. I think
15 we're ready then to get us back on track, and
16 let's go back, Wally, to you, and then Mary
17 Ellen, with your questions of the agency.

18 W. BOSTON: Thank you, and Mary Ellen
19 and I are probably going to alternate questions
20 just to break them up, but we did coordinate a
21 few questions.

22 So, Dr. Wheelan, I was impressed with

1 your presentation, particularly when you said
2 that you all not only reviewed data from IPEDS,
3 but the scorecard and even our dashboard, what we
4 have in our revised dashboard that was just
5 issued.

6 You talked about your initiatives to
7 have institutions set goals to maintain a focus
8 on student learning and achievement, and allow
9 them to use one of four different identified
10 metrics or even their own metric, and so I look
11 at --

12 You talked about the 25 lowest
13 performing institutions, but I look at the 226
14 schools that are in the lowest quintile on our
15 dashboard for graduation rates, and does the same
16 focus that you have for the 25 lowest apply to a
17 number that's ten times that with the 226 and do
18 you happen to have any metrics for that group or
19 is it just when you gave us the metrics it was
20 just those 25 lowest?

21 B. WHEELAN: I don't in front of me
22 have specific percentage increases, as I did for

1 those, because we focused on those since they had
2 been the focus of the previous NACIQI meetings.

3 I can say that with each of our
4 institutions we go through the same rigorous
5 review as we do for those with the lower ones.
6 We even get complaints from our institutions that
7 are doing well that, you know, why are you
8 picking on me, because we are already doing well?

9 But we still want to make sure that
10 all of the subgroups, you know, that are included
11 now in the disaggregated data are addressed as
12 far as moving them forward as well.

13 We do have an opportunity for each of
14 the institutions to explain what it is that they
15 are doing to move themselves forward. So, it's
16 not just the minimum ones that -- I mean, the
17 ones at the lowest, but for all of them we just
18 recognize that many of our institutions are
19 minority-serving institutions and that research
20 has shown us that poor students and minority
21 students graduate at lower rates or slower rates.

22 And so, some of that has to do with

1 the fact that the population of the institution
2 is challenged, you know, to meet the goals. We
3 still hold them responsible. We still ask them
4 all to come up with a plan on how they are going
5 to do things. And we review that plan with them
6 to make sure that they are making progress.

7 So, I hope that answers your question.

8 W. BOSTON: It does. And then I just
9 want to follow it up with another question. It's
10 not outlined in our dashboard but it certainly is
11 influential for ultimate graduation rate and
12 completion rate. Which is do you all have a goal
13 related to transfer credits and the institutions'
14 recognition of transfer credits to facilitate a
15 quicker time to graduation, as well as a more
16 affordable?

17 B. WHEELAN: We don't have a goal.

18 But we find that many of those institutions about
19 which you just asked me, if you combine their
20 transfer rate with their graduation rate, it's a
21 lot higher than just the graduation rate. And
22 that's especially true of our community colleges

1 where they may have a 20 percent graduation rate,
2 but when you look at their transfer rate it moves
3 it closer to a 50 percent success rate, for lack
4 of a better phrase.

5 W. BOSTON: Well, you did a good job
6 of reading the dashboard because the lowest
7 quintile actually goes from 33 percent to 54
8 percent when you include the transfer rate, so.

9 B. WHEELAN: Yes.

10 W. BOSTON: Okay. Mary Ellen.

11 M.E. PETRISKO: Thank you.

12 First let me say that my technology
13 has also been a little quirky today. And my
14 videos going in and out. And I feel that it
15 won't go out now. I think my sound will stay
16 even if my video is out. But if my video goes
17 out, it's not because I'm not interested in
18 what's going on. Thank you.

19 Dr. Wheelan, I'd like to continue a
20 little bit with the, with the issue of data and
21 what you know. I was very impressed with your
22 presentation. Thank you. You gave us a lot of

1 concrete information and data that I think is
2 very valuable in setting a current picture of the
3 agency.

4 I want to talk a little bit about the
5 HBCUs in particular. Looking at the HBCUs in the
6 country, I believe there are 119 or 120. And I
7 think we have about 100 of them. We certainly
8 have the lion's share of those institutions.

9 I'm wondering with regards to those
10 institutions -- and I realize that this is our
11 discussion as well, who they are, what their
12 history is, and success, student success, et
13 cetera. Still, we talk about them as a sector.
14 So, I'm wondering how SACSCOC looks at the sector
15 of the HBCUs with regard to success and these
16 metrics.

17 Have you disaggregated your own kind
18 of dashboard for the HBCUs? What have you
19 learned?

20 And I ask the question because it's an
21 important question. But I also want to give you
22 the opportunity to tell us a little bit more

1 about how SACSCOC is working with the HBCUs in
2 light of licensed educational press on that, in
3 that area.

4 So, tell us what you can. Thank you.

5 B. WHEELAN: Thank you for that
6 question, Dr. Petrisko. I appreciate it.

7 When I first arrived at the Commission
8 17 years ago we had just put in a new set of
9 standards at that time. We had revised our
10 standards and had gone from over 400 compliance
11 issues down to about 89 standards. And we did an
12 analysis to see which of those standards were
13 creating havoc for which of our institutions.

14 And we found that it was our small
15 institutions, some of our private institutions,
16 and our HBCUs. And so, we implemented what we
17 called the Small College Initiative which -- to
18 which that was what I alluded to earlier when I
19 said we invite institutions with 2,000 FTE or
20 fewer, and the HBCUs, to participate there.

21 And those meetings focused on our
22 standards, the ones that have the biggest

1 problems. We've done them on institutional
2 effectiveness. We've done them on financial
3 management. We've done them on government. You
4 know, we've done them on just about everything
5 that you have, except for faculty qualifications.
6 That's one that's intended for all of our
7 institutions.

8 And what we have found is that our
9 HBCUs are less often in trouble with us than they
10 have been before. That's the best way I can say
11 that. They've had fewer noncompliance issues
12 going forward than they had when I first got
13 here.

14 Part of that is also because we have
15 been able to recruit more folks from HBCU into
16 our peer evaluator registry. Many of those
17 institutions historically didn't have anybody at
18 the college who understood our regulations and
19 standards. And so, they didn't know, you know,
20 how to respond when a self-study or a compliance
21 certification came along.

22 They weren't on peer review

1 committees. And we always tell them that, you
2 know, that's probably the best learning tool is
3 to go out on a committee to learn what goes on at
4 another institution and how the Commission
5 evaluates things.

6 So, we've been able to increase the
7 number of participants from HBCUs in our peer
8 registry. We have more HBCU representation on
9 our governing board than we've ever had before.
10 And so, there has been a marked improvement in
11 the participation of those institutions.

12 And as I said, while they still may
13 have some noncompliance issues, they don't have
14 nearly as many as they have had in the past, I
15 think because of the greater participation, and
16 our focus at our annual meeting and summer
17 institutions that are germane to them.

18 M.E. PETRISKO: I'm going to ask a
19 follow-up on that.

20 You mentioned, I think a couple times,
21 and I think we all know this, that success rates
22 among lower socioeconomic status and minority

1 groups, success rates are lower. And I think
2 recognizing that should not -- and I know this is
3 not the case in this case, but to this point --
4 recognizing that should not be an excuse for
5 lower achievement. It's not -- you know, we
6 don't want to stand by lower expectations.

7 B. WHEELAN: No.

8 M.E. PETRISKO: Having said that, and
9 understanding that there are lots of factors in
10 these achievement questions, many of which are
11 outside of the possibility of an institutional
12 and accreditor to deal with, what more do you
13 think can be done? Is it more quantitatively of
14 what is already being done? Are there other
15 initiatives that could be helpful if there were
16 funding, if we had a magic wand to make a
17 difference there? What would you say?

18 B. WHEELAN: I think institutions are
19 beginning to focus more on student success
20 programs and to provide additional tutoring and,
21 you know, instructional management for those
22 students than they have before.

1 But graduation rates at HBCUs tend to
2 look better once you get to an 8-year graduation
3 rate, and a 4- or even 6-year graduation rate.
4 Their students drop out and come back.

5 Ms. Fuse-Hall was president of an HBCU
6 and can certainly contribute more than I can from
7 a firsthand standpoint. But, you know, they tend
8 to be life reasons that slow down participation.
9 You know, I ran out of money; I have to go take
10 care of a family; whatever.

11 Ros, do you want to add something?

12 R. FUSE-HALL: The only thing I would
13 echo on that is the notion that, you know, most
14 of these students work 35 to 40 hours week. They
15 give half of their financial aid to their
16 families.

17 Those are, those are things that they
18 normally do. And when they talk to their peers,
19 their peers are doing the same thing. So, they
20 feel like this is what they should do.

21 And so, those are some of the
22 challenges. Like you said, sure, money can

1 always help, but from an accrediting standpoint,
2 what I think has been helpful, looking at how we
3 are working with not only HBCUs but smaller
4 institutions in general, is the dedicated work
5 that we do with that Small College Initiative,
6 looking specifically at particular topics that
7 are presenting challenges, and then how they
8 continue to work with their students.

9 M.E. PETRISKO: One last follow-up on
10 that.

11 Can you track your graduation rate?
12 I'm just curious. I mean, that's not a regular
13 thing, it can be 150 percent. But if you look at
14 it would you have specifics on that?

15 B. WHEELAN: Alexi's plane has just
16 landed. And he's trying to log in. And he'll be
17 the one to answer that question for you.

18 M.E. PETRISKO: Okay, thank you.

19 B. WHEELAN: I don't know officially
20 if we do or not. We do specifically track the
21 productivity at the HBCUs, so I don't know if
22 it's an official thing or just something he keeps

1 because we know it's useful.

2 M.E. PETRISKO: It can be useful.

3 B. WHEELAN: Yeah.

4 M.E. PETRISKO: Would be interesting
5 to see.

6 B. WHEELAN: Yes.

7 M.E. PETRISKO: I'm going to move on
8 to another question. And that's another kind of
9 broad question.

10 And that is, looking at especially the
11 region that you serve and the recent, well, not
12 so recent, the last couple years of the pandemic,
13 I think those states, some of those states have
14 been particularly hard hit by the pandemic.

15 And so, I'm wondering how you're
16 seeing the ongoing effects of that on your
17 institutions on the faculty, the staff, the
18 students, and yourself as an accreditor, as an
19 agency, how are you dealing with this and dealing
20 with them. What have the challenges been?

21 B. WHEELAN: Wow, that's a
22 multifaceted question. Let me see if I can break

1 it down.

2 From our institutions, their student
3 enrollments have declined, just like they have
4 all over the country. I don't think they
5 declined at a more alarming rate than anyplace
6 else. But they have declined.

7 There have been very -- all across the
8 region they have been very attentive to the
9 mental health needs of students and to the food
10 insecurity that many of them have. I've seen a
11 great number of food pantries being put in at
12 institutions of all degree types.

13 And I'm hearing now that the mental
14 health challenges, a lot of the COVID money that
15 came down is being used for mental health
16 services and to increase the staff, the
17 counseling staff at various institutions.

18 They -- we only have 75 of our almost
19 800 institutions that were not already approved
20 to offer distance learning. And so they were
21 very quick, those 75 were very quick to get
22 approved.

1 The Department gave emergency approval
2 for a semester. And because we didn't know if
3 they were going to continue to grant that, we
4 said, if you want to continue to do that then you
5 need to go on and apply, you know, for official
6 approval. And they all did.

7 Some of those, those 75 that had not,
8 were able to partner with other institutions and
9 say, you know, not only can our students, you
10 know, plug into your courses and transfer them
11 back to us, but can we also, now that we're up
12 and running, use some of your training materials
13 so that we can train our faculty on how to do
14 that and things like that.

15 So, there was a lot of collaboration
16 and collegiality across institutions so that, you
17 know, the students did not miss a beat, as it
18 were, going forward.

19 We were able to do virtual visits for
20 reaffirmation and for substantive changes, even
21 though we had to follow up on those because there
22 is a requirement for the follow-up. We had about

1 180 virtual visits we did. And we have followed
2 up with all but 39. We feel very good about
3 that.

4 It's put a big stress and strain on my
5 staff because the vice president traveled to
6 every visit. With these follow-ups we have had
7 the peer reviewers who have gone to do the
8 follow-up rather than staff. But staff has also
9 done them, in addition to advisory visits, and
10 sub change visits, and everything else that
11 they've done.

12 So, you know, staff is tired. There's
13 no doubt about it. We have adjusted our workday
14 such that we started out working two days a week
15 in the office: half the staff Monday/Wednesday,
16 and the other staff Tuesday/Thursday. Then I
17 brought everybody back for four days.

18 And then the gas crunch hit, so I sent
19 everybody back home. And so, we're in the office
20 only Tuesday, Wednesday, Thursday, working from
21 home Monday and Friday. And so, you know, we're
22 hanging in there.

1 But it has been stressful, there's no
2 doubt about it.

3 M.E. PETRISKO: So, sounds like you've
4 adapted. And as far as quality is concerned with
5 offerings and the work that you've done, you've
6 done it differently but the quality has been
7 maintained.

8 B. WHEELAN: Yes. We haven't missed
9 a beat.

10 We had our annual meeting virtually
11 twice. We had a summer institute virtually once.

12 We just had an in-person virtual
13 meeting this week as a matter of fact. I was
14 there listening to you all and trying to
15 participate there.

16 So, no. And our institutions, Dr.
17 Maloney might want to address that, but the
18 quality of the reports that have come in and the
19 actions by the board, you know, are, as Dr.
20 Harris even mentioned, you know, we haven't lost
21 a beat.

22 M.E. PETRISKO: Thank you.

1 R. MALONEY: Yes, if I may join in.

2 Dr. Wheelan was incredibly aware of
3 the challenges that we had, and really worked
4 with us getting approval for online. I was one
5 of the institutions that my institution was not
6 approved for online.

7 Online work was the farthest thing
8 from our mind. And Dr. Wheelan has helped us get
9 onboard and get our application approved. So, I
10 really thank her for that. She was ahead of the
11 game, keeping us ready for that.

12 And we have benefitted from it so
13 much.

14 Our board, the way that we work with
15 reports, the work that we work with visits, I
16 have been so impressed with the virtual visits,
17 the depth of conversations that we've had. I
18 don't think we have missed a beat.

19 And I think we may adopt some of that
20 online discussion in the future because it has
21 been so fruitful.

22 M.E. PETRISKO: Right. Thank you very

1 much.

2 That's my questions. I'll shift back
3 to Wally for some additional questions on his
4 side.

5 W. BOSTON: Sure. Thank you.

6 So, during our review we noticed that
7 you had a new principal and student debt, 12.6.
8 And you actually mentioned that in your opening
9 dialog.

10 You answered one of my questions,
11 which is how it was being applied. I think you
12 said it applies to every institution, regardless
13 of whether they participate in federal student
14 aid

15 Can you tell us, though, what effect
16 that new principal and student debt is having
17 overall, and if you've noticed any changes?

18 B. WHEELAN: If you can give me 30
19 seconds so I can find my numbers so I can give
20 you an exact number.

21 The student debt has decreased. And
22 while I'm sure we're not totally the reason for

1 it, there is, I think, that new standard we put
2 in about educating students on debt has indeed
3 had a significant impact on it.

4 Ros, do you have that?

5 R. FUSE-HALL: Yes, ma'am. It's on
6 the section of trends. And the student debt --
7 excuse me -- for the class of 2019, for that
8 cohort it was about 13 percent for noncompliance.

9 For the class of 2020, those
10 institutions that were under the decennial
11 review, it went down to 7 percent.

12 And for the class of 2021 it was up
13 slightly to 8 percent.

14 So, that's what we're seeing overall.
15 So, it looks as though it is having an impact, a
16 positive impact when it's noncompliant since we
17 adopted this.

18 W. BOSTON: So that that, are those
19 percentage you just quoted your default, default
20 rate?

21 R. FUSE-HALL: Yes.

22 B. WHEELAN: Yes.

1 W. BOSTON: Okay. But I think, Dr.
2 Wheelan, you said that overall levels of debt
3 have decreased?

4 B. WHEELAN: Yes.

5 W. BOSTON: Okay. Any, were you able
6 to find any of your statistics on that?

7 B. WHEELAN: Oh, Alexi's trying to log
8 in.

9 W. BOSTON: Okay. I did notice that
10 in the dashboard it says that 38 percent of all
11 of these students use FSA. And there is also a
12 38 percent tell rate.

13 I happen to live in Texas. And we
14 have a Texas 60x30TX initiative. And one of the
15 goals there is to keep student debt under 50
16 percent. And I think -- or to keep students who
17 have to borrow at all at 50 percent or greater.
18 And they're currently at 56 percent.

19 So, the fact that you're at 62 percent
20 for not borrowing, or at least not using federal
21 aid but may use private ones, that's pretty good.

22 B. WHEELAN: Thank you.

1 W. BOSTON: Mary Ellen, I'll pass it
2 back to you.

3 M.E. PETRISKO: Okay. Thank you.

4 I want to ask a question about the
5 QEP, the Quality Enhancement Plan, that the
6 institutions have done. This has been a feature
7 at SACSCOC for a while. And I know it's been a
8 point of pride for the institutions that engage
9 in this.

10 But I notice that it's no longer a
11 core requirement for you. And I've been looking
12 at your Executive Council minutes of 2017,
13 December 2017. December 2017 there was notes
14 about concerns about the QEP.

15 So, I'm just wondering what it means
16 that it's no longer core requirement. It's still
17 required, I believe, but it's not a core
18 requirement. And what's the difference there?

19 And what were the concerns about that?
20 And how is it evolving? What are you doing with
21 it now?

22 B. WHEELAN: Some of our institutions

1 that are very large had interpreted the direction
2 we have of involving everybody in the
3 institution, meaning literally everybody in the
4 institution. And they thought that was
5 absolutely ridiculous, and they wanted to get rid
6 of the QEP because there was no way that they
7 could pull that off.

8 That was never the intent. It was,
9 the intent was such that the president and his or
10 her cabinet weren't the ones making this
11 decision, or a handful of people wasn't making
12 this decision, and so that it would be an
13 inclusive group of folks from across the
14 institution.

15 Once we clarified that, they felt
16 better about it. Once we also clarified that
17 they didn't have to create a whole new project,
18 that they could use something out of their
19 strategic plan, then those same institutions felt
20 a lot better about it.

21 And so, that conversation came up
22 during the principals' review. And that's why it

1 was in the 2017 time frame when it was approved
2 to go back in.

3 It was taken out as a core requirement
4 because the membership felt that it was something
5 they could do. And we tied it into our standard
6 on student achievement, which is a core
7 requirement. And so, we didn't feel the need to
8 make them both core requirements, as it was,
9 since it was subsumed under 8.1.

10 I mention, if you might remember, that
11 part of what we did was to restructure them so
12 that we didn't have so much duplication and
13 stuff. And that was one of those issues.

14 But, yes, it is still required. It is
15 still believed, even by those institutions that
16 didn't want it in the first place, to be a
17 valuable process for institutions to demonstrate
18 how they're helping students improve.

19 M.E. PETRISKO: Those plans have to be
20 approved; right? Taking something and you're
21 feeling this is really not legitimate as a
22 project that's worthy of the name, and you don't

1 approve it.

2 B. WHEELAN: Yes, they do. They have
3 to be approved.

4 M.E. PETRISKO: Okay.

5 B. WHEELAN: And we've given them an
6 opportunity now to submit a description of what
7 they want to do, along with their compliance
8 certification such that the Offsite Committee
9 reviews it even before they start working on it.

10 It had been that only, it was only
11 approved once the Onsite Committee came. But now
12 we're giving them an early start.

13 M.E. PETRISKO: Okay. Makes sense.

14 Okay. I have one last question. And
15 that is one probably you anticipated our asking,
16 something we talked about earlier in the policy
17 needs.

18 Florida has just made -- just decided
19 that public institutions will be required to
20 change accreditors between, you know, once an
21 accreditation period they're going to have to go
22 to a different accreditor.

1 So, big question about how are the
2 institutions looking at this. How are you
3 looking at this? How are you possibly handling
4 this?

5 And you're laughing.

6 B. WHEELAN: It's either that or cry.

7 This, this was -- I don't know of one
8 Florida institution that's in favor of this, to
9 start out with. This was not driven by the
10 institutions.

11 During the legislative process, the
12 Senate Finance Committee had a hearing, and one
13 of the faculty members got up and said, you know,
14 we've had two years when this -- since this
15 process has been in place, and not one
16 institution has bothered to apply. Nobody wants
17 this.

18 There is, reportedly, a directive to
19 the presidents not to say anything during this
20 process or their funding would have been
21 impacted. And so, you didn't get to hear from
22 any of the presidents at any of the institutions.

1 I was told if I went down there it
2 would be setting off a lightning rod. And so,
3 one of my staff went down to suggest to them
4 that, you know, this is an institutional issue,
5 not a, you know, legislative issue. And that we
6 were concerned that it was taking away the
7 autonomy of the institutions. But it fell on
8 deaf ears.

9 I have told the Florida institutions
10 that they are still our institutions until they
11 are no longer our institutions. And we expect
12 them to continue to participate, you know, as a
13 member just as they always have.

14 I have nothing else to say about it.
15 They have to -- I mean, this is on them now. I,
16 this is my 48th year in higher education. And I
17 have worked as a state secretary of education and
18 I have never seen a bill go forward that did not
19 have a financial impact statement to it. But
20 this one didn't because they didn't care how much
21 it cost. They wanted this to happen.

22 So, I, you know, by me, my crystal

1 ball's told me we've got a brainstorm going on
2 here. So, I don't know what to tell you. It's
3 unfortunate. It's expensive. It's going to mean
4 institutions are going to be in the middle of two
5 processes at the same time because they're still
6 going to have to be compliant to our standards,
7 as well as trying to learn somebody else's.

8 M.E. PETRISKO: Well, with that, thank
9 you, that was my questions, Madam Chair. I'll
10 turn it back over to you.

11 J. DERBY: And, Wally, did you have
12 any further questions?

13 W. BOSTON: Not for now. I'm going to
14 just defer to other questions from members of the
15 committee that they may have, and comment
16 accordingly. Thank you.

17 J. DERBY: Then let's open it up to
18 members of NACIQI for their questions.

19 Jennifer, you're first.

20 J. BLUM: Thanks. So, I have a
21 question about your board. Am I right that I
22 read that it's 77 members? And, if so, can you

1 just -- and there may be other agencies that have
2 boards that big.

3 And I'm certainly, you know, I'm
4 raising this really as an issue, I'm just raising
5 the question of how did it get to be 77 members?

6 And I have a follow-up question after
7 that.

8 B. WHEELAN: I do believe we have the
9 largest of the boards of any accrediting body.
10 And it has -- it's historic.

11 Our members wanted to make sure that
12 every state had equal representation. And so,
13 when you look at the board, every state in a
14 region has a minimum of four board members: one
15 person who represents undergraduate institutions,
16 two people who represent graduate institutions,
17 and a public member. That's 44 members right
18 there because we have 11 states.

19 We have one position for our
20 international institutions, so that they're kind
21 of in their own state, if you will, and they
22 rotate among themselves who serves on the board.

1 That's 45.

2 And then the other 23 we call at-large
3 members. And we use them to ensure that there's
4 adequate representation of public and private and
5 for-profit institutions, and males and females,
6 and majority and minority members.

7 J. BLUM: Okay, thanks.

8 I mean, I do, and again I, you know,
9 that just seems too unwieldy to me. But I do
10 think from a government standpoint, I understand
11 that it sounds like you have other area factors,
12 executive council, and other mechanisms in terms
13 of governance that help manage that.

14 So, but I, I mean it does seem, and to
15 your point, historic. And especially as, you
16 know, as you open up to additional geographic,
17 you know, schools being able to apply from other
18 regions, it does seem like something that's
19 maybe, you know, worth a review.

20 And, I know Bob might have a question
21 on this, but I, I share this interest with regard
22 to public members and with regard to membership

1 in general on, on governing boards of agencies.
2 And so, I think I saw that you are compliant with
3 the one-seventh rule.

4 But I would say there's something to
5 me about if you have a board of 77, so it feels
6 very diluted to just meet the one-seventh ratio.
7 And, I mean, to your point about, you know, the
8 representation of your institutions, while I'm a
9 huge fan and supporter of peer review as the
10 process piece under accreditation, I mean, I, you
11 know, can't emphasize enough how supportive I am
12 of peer review.

13 At the governing level, you know, at
14 that senior level of the board governance it
15 gives me a little bit of pause to just meet the
16 seventh. And it's only my comment, because it's
17 compliant with the standard, but, you know, I
18 guess, you know, and maybe it's not a question,
19 maybe that's just a comment on my part. The one-
20 seventh, meeting, you know, just meeting it seems
21 quite lean to me. Although I understand that
22 that's a, you know, a compliance issue, and

1 you've met it.

2 I do have one other questions.

3 So, as I mentioned when I was talking
4 to Dr. Harris in my questions about, you know,
5 for documentation, transfer of credit is another
6 area that I've for years cared a lot about. I
7 know Wally sort of touched on transfer of credit
8 that relates to outcomes.

9 I also think it's really important as
10 it relates to making sure that schools have
11 policies in play to both allow transfer out,
12 allow transfer in.

13 And I noted when I was looking at the
14 criteria that you didn't meet, I believe that
15 transfer of credit policy is still one of the
16 ones that's outstanding, but that you didn't
17 provide any records of how you review your
18 institutions' compliance with transfer of credit
19 policy.

20 And I don't know if that's an example
21 of just sort of an administrative oversight in
22 the process of your petition review, or if

1 there's another reason that you were unable to
2 provide the appropriate documentation for that
3 criteria. But I am interested in it because I've
4 long been focused on transfer of credit as
5 something that needs more transparency.

6 B. WHEELAN: That's news to me that
7 the documentation is not there on that particular
8 item. Because we, we do have a standard on
9 transfer of credit. And you should note that
10 policy on, you know, how they evaluate that
11 transfer of credit incoming.

12 And it is reviewed, you know, at the
13 Offsite and Onsite Committees.

14 Dr. Harris, do you want to say
15 something?

16 N. HARRIS: Yes. I wanted to speak up
17 on that.

18 So, the agency does have a policy.
19 They have not provided evidence. If you look at
20 the --

21 J. BLUM: Right. That's what I was
22 saying.

1 N. HARRIS: Yeah, they have it. The
2 agency does have a policy. They were requested
3 in the file review to provide evidence over the
4 recognition period of the execution of the
5 policy, which had not been done.

6 J. BLUM: That, and that's what I was
7 alluding to.

8 N. HARRIS: Correct.

9 J. BLUM: For that clarification.

10 N. HARRIS: Correct.

11 J. BLUM: I wasn't ever questioning
12 whether, you know, the facts and policies.

13 N. HARRIS: No, they have a policy.
14 It's just, again, my review is based on evidence.

15 J. BLUM: Right. Well, evidence. And
16 for us as the CCN, and for you as NACIQI, I
17 believe our role is to not just sort of check the
18 box on whether a policy exists, but also whether
19 the agency is actually evaluate -- using its
20 policies and standards --

21 N. HARRIS: Correct.

22 J. BLUM: -- in an evaluative process.

1 And that, that's why I'm asking Dr. Wheelan is
2 there a reason that that document. And it may
3 just be part of the administrative complexity.
4 And that's fine. But that, just for me I'm
5 previewing that that will be something that I'll
6 see now in the next go-around.

7 You know, I'm particularly interested
8 because I feel I'm pretty passionate about the
9 subject of transfer of credit.

10 R. FUSE-HALL: One of the things I do
11 want to add, Dr. Wheelan, if you will let me
12 speak for a minute, is that while there was a
13 substantial list submitted on June the 1st, what
14 Dr. Harris did not add was that we did respond to
15 that on June the 3rd, as requested.

16 And so, I believe that information was
17 provided in that, in that presentation. Because
18 I agree with you, Jennifer, we have that
19 information. And so, I'm not sure why that's
20 still missing.

21 N. HARRIS: Okay. Just to speak to
22 that -- I'm sorry, my hand is still raised --

1 just to speak to that, Ros is correct that she
2 did send information in. Again, as I stated
3 earlier, to I think it was Mr. Booth, the
4 information that's cited in the petition is
5 information that was not included.

6 The agency also notified us during
7 that time frame and their submission that they
8 had not completed all the information that was
9 provided from 602.22 to 602.28.

10 Transfer of credit policies is
11 602.24(e), which in their email back to me, which
12 I gave them their cutoff date, they explained to
13 me that they included everything in the file
14 review documentation that was requested, except
15 those from 602.22 to 602.28.

16 So, that's the reason that's cited
17 here. That information was not provided. And
18 their email correspondence reflects it.

19 Thank you.

20 B. WHEELAN: As I indicated, we have
21 no problem submitting that information. We have
22 it.

1 N. HARRIS: Correct.

2 B. WHEELAN: And appreciate your
3 interest in transfer.

4 I have told our Executive Council two
5 years ago, they would know I was ready to retire
6 when I brought forth the recommendation for a
7 policy that all SACSCOC accredited institutions
8 should accept all credits from all other SACSCOC
9 accredited institutions because faculty will go
10 ballistic. Because that's an institutional issue
11 and not a -- a determination and not an
12 accrediting one.

13 But it makes no sense to me as a
14 lifelong educator that institutions that are
15 accredited by the same organization would not
16 accept credits from other institutions accredited
17 by the same accrediting body.

18 So, I have gotten closer to
19 retirement. But I'm still not bringing that
20 policy forward.

21 J. DERBY: Zakiya, you're next.

22 Z. SMITH ELLIS: Thank you.

1 And thank you for both being here.
2 And with all the information that we have to go
3 through, I'll try to be brief.

4 There was previously a question about
5 -- because I have two questions -- but there was
6 previously a question about HBCUs. And I just
7 want to double back to that because I know that
8 you do accredit the vast majority of HBCUs in the
9 nation.

10 And there are so many issues related
11 to their difficulties that they've had in
12 operating over the past not just several years,
13 but many years at this point, as well as kind of
14 balancing how to ensure good student outcomes.

15 And they are doing this in the face of
16 not just financial pressure, but I think
17 constraints that are structural, including
18 institutional racism and, you know, state-
19 sanctioned racism in some cases to institutions
20 that have been dealing with that in a public
21 sense.

22 So, I'm wondering how do you kind of

1 balance those issues, those structural issues
2 that some of the institutions face, as well as
3 ensure that you're able to maintain the quality,
4 you know, in support of those institutions'
5 students?

6 So, kind of what is, how do you
7 balance those, those kind of aggregate issues at
8 those institutions that are HBCUs, as well as
9 kind of support them, as you've mentioned, from
10 the small schools and HBCU group.

11 B. WHEELAN: I'm going to put my
12 chairman on notice that I'm going to ask her to
13 respond from a board perspective and how the
14 board, you know, evaluates their compliance with
15 decisions that come through.

16 One of the things that we do -- thank
17 you for your question -- is that we make sure
18 that there is someone from an HBCU on every HBCU
19 review committee. Because I think some of the
20 conversation before I got here was that you send
21 us committees and nobody understands our mission
22 and what it is that we do.

1 And we try very hard because the
2 evaluating institutions comply against their
3 mission, to make sure that there is someone from
4 an HBCU generally chairing the committee but, if
5 not, at least serving on the committee so that
6 they can help the rest of the committee
7 understand, you know, how they are able to do
8 what they do with their limited resources, with
9 the, you know, institutional history and
10 everything else that goes along with it.

11 One of the reasons we put in the Small
12 College Initiative was because the HBCUs were
13 having significant challenges. And as I
14 mentioned earlier, the number of noncompliance
15 issues by HBCUs has decreased significantly.

16 Dr. Matveev has finally gotten off his
17 plane and is on this call and can talk about it.

18 Alexi, they asked me earlier about the
19 performance of HBCUs. And that was one of the
20 statements I just made was that they have gotten
21 better in complying.

22 We also, you know, work with them with

1 how to write responses to the compliance
2 certification. Because, again, if you have not
3 ever served on a committee and had to read one of
4 those reports, you don't necessarily know what to
5 put in it. Much like we don't know what to put
6 in our report back to NACIQI. You know, Ros had
7 never did one before. That kind of thing.

8 Alexi, do you want to talk a bit about
9 the performance of HBCUs?

10 A. MATVEEV: Thank you, Dr. Wheelan.

11 Good afternoon, colleagues. And thank
12 you for the question about HBCUs.

13 I worked for 12 years with HBCUs, and
14 I really appreciate your attention to these parts
15 of higher education.

16 As Dr. Wheelan indicated, when you
17 look at the term data from HBCUs regarding the
18 noncompliance statistics, there is an improvement
19 trend in terms of the decreased noncompliance
20 issues.

21 Obviously, yes, they have continued
22 having, as you mentioned, structural challenges.

1 They have challenges related to historic
2 underfunding. But we introduced a systematic
3 approach to support these institutions.

4 And the two main elements, as Dr.
5 Wheelan mentioned, are the Small College
6 Initiative, the annual gathering that we
7 facilitate to help HBCUs and other small
8 institutions to address their challenges.

9 And the second thing is I would call
10 it the single best way for an institution to
11 prepare for the review is to serve on the
12 committee. And we do bring in peer evaluators
13 from HBCUs to become -- or to serve on the
14 committee.

15 For example, just two days ago we had
16 the training for academic evaluators for the
17 chief academic officer post. And we had several
18 representatives from HBCUs.

19 In a week we will have a training for
20 our committee chair, the new committee chair,
21 since we have three or four representatives from
22 HBCUs.

1 So, training and support is an
2 important component in our program.

3 Z. SMITH ELLIS: Thank you. I have
4 one other question unrelated to that. And that's
5 about institutions that may be under
6 investigation for, for fraud.

7 I know it's been the case,
8 unfortunately, with some of them. And I'm just
9 curious. And I will apologize. I am new to
10 NACIQI, and also just the volume of things. So,
11 if this is already in the materials, if you could
12 just point me to it.

13 I'm curious what steps you may take to
14 work with or determine if an institution has been
15 under investigation by either state or federal
16 authorities, what steps you take to follow up on
17 those inquiries, if any.

18 And to determine if any of your stats,
19 you know, standards have been in fact violated
20 or, if they haven't, to determine if there needs
21 to be kind of any amendments to your own
22 standards to align with, you know, any gaps in

1 oversight that you may, that you may identify?

2 B. WHEELAN: So, this is one of the
3 reasons that Florida is upset with -- that's not
4 the word I was thinking of, but I'll use that
5 word -- with us is because we have what we call
6 an unsolicited information policy. If a
7 complaint comes in, and our complaints must be
8 signed by the complainant so that we can make
9 sure it's right, I mean it's an honest complaint.

10 If the institution self-reports, or if
11 during the field review or fifth year report we
12 find out that an institution is out of
13 compliance, you know, we can investigate that.

14 When the media has something that
15 comes forward, then the vice president assigned
16 to the institution will write a letter saying the
17 Houston Post, or whatever newspaper, the
18 Washington Post -- wouldn't be Washington Post
19 because that's not our region -- but, you know,
20 it has said this, and it appears that if this is
21 true you might be out of compliance with our
22 standard 6.2, or whatever it is. Please send me

1 that documentation within 45 days to show that
2 you are still in compliance with our standards.

3 They send in the documentation. We
4 analyze it to see if they, we feel that they have
5 done what they can reasonably back in compliance.
6 And we'll say, okay, good to go.

7 If not, then we send a committee to
8 the institution to interview with the folks who
9 are there, find out what's going on. And they
10 come back and make a recommendation to our board
11 as to whether the institution is in compliance or
12 not.

13 This is what happened with the
14 University of Florida. The media was big on the
15 fact that the faculty members at the university
16 were told they could not testify against a state
17 agency because they were state employees.

18 And we have a standard on academic
19 freedom and that, you know, faculties can indeed
20 do that. And so, we sent a letter saying that
21 you might be out of compliance. Please document
22 that you are still in compliance.

1 The institution sent back a, I think
2 it was 98 pages, 5 pages of response and then 93
3 pages of addenda, to show that they were in
4 compliance.

5 Well, in between their sending it back
6 there was a lawsuit that was filed by faculty, or
7 a couple of lawsuits. So, you know, we decided
8 that maybe we need to send a team down there to
9 find out what's really going on because there's
10 just still a lot of stuff.

11 So, we did. We sent a team down to
12 visit. They interviewed faculty. They
13 interviewed the administration. And made a
14 recommendation to the board that the college was
15 indeed -- or university was indeed in compliance.
16 And so, the issue was dropped at that particular
17 point.

18 So, that's the process we would follow
19 with any institution.

20 If there is a lawsuit going on, we
21 tend to wait until the lawsuit is over, because
22 we don't know what it's going to do, before we

1 will complete our investigation of what's going
2 on. But we try to stay on top of, you know, all
3 of it.

4 Z. SMITH ELLIS: Thank you.

5 J. DERBY: Bob?

6 B. SHIREMAN: Thank you. I have a
7 number of questions.

8 Your application mentioned that you
9 have returned a number of complaints to people
10 because the complaint was not signed. And you
11 just mentioned that you require complaints to be
12 signed.

13 Document GG-3, for example, told a
14 complainant -- it's a copy of a letter to the
15 complainant rejecting the complaint because it
16 was not signed. You mailed the letter to the
17 person who provided the complaint.

18 So, what do you mean that it was not
19 signed?

20 B. WHEELAN: We have a form, a
21 complaint form that asks them to tie whatever
22 their complaint is directly to an accreditation

1 standard. And we ask them to sign the form.
2 Because otherwise we don't know whether this is a
3 legitimate complaint or somebody's just trying
4 to, you know, create problems for an institution
5 or not. And then this way we are able to track
6 it better.

7 B. SHIREMAN: So, they can sign the
8 form and take a picture of it and send it to you
9 by email?

10 B. WHEELAN: No. Got to be an
11 original signature, much like the wet signatures
12 that you all require recusals.

13 B. SHIREMAN: Okay. So, so a
14 complainant -- so, if you see something in the
15 news, like about University of Florida, you'll
16 follow up. You'll follow up with the
17 institution.

18 But if you get a complaint from a
19 person raising what seems like a valid issue but
20 it's in an email, that you know who the person
21 is, you, you will not follow-up? You'll --

22 B. WHEELAN: No. I'm not saying, I'm

1 not saying that at all.

2 It won't go through the official
3 complaint process, however. I have been known to
4 pick up the phone and call a president and say,
5 we've gotten this information. Just want to
6 alert you to it and ask, if there is an issue,
7 please, you know, let me know what you're doing
8 about it. But it would not go through the, you
9 know, the formal complaint process where it would
10 end up all the way to the board.

11 B. SHIREMAN: Okay.

12 R. FUSE-HALL: And also, if we find,
13 if we have an email from someone like that, we
14 have a person designated in my office who works
15 with complaints.

16 Usually, what she will do is either
17 send an email back and give them the website for
18 filing a complete complaint and/or she will call
19 the person, set a time to talk with the person
20 and walk them through the process of how to file
21 a complaint.

22 B. SHIREMAN: Okay. So, document GG-2

1 is another example of a complaint. It's a letter
2 from SACS informing the complainant that you're
3 rejecting their complaint because it could not be
4 processed because we only received one copy of
5 the complaint and one copy of the documentation.

6 So, what is that about?

7 R. FUSE-HALL: It means that they have
8 not followed the process. Because the process
9 says I think they have to submit two copies so
10 that we can keep a hard copy in our office, and
11 then there's a copy that we send over to the vice
12 president for them to review and document.

13 B. SHIREMAN: So, you send it by mail,
14 you don't, you don't scan it and send it by email
15 to the vice president?

16 R. FUSE-HALL: No. No.

17 I mean, we -- the vice presidents are
18 in the same office, so we literally walk across
19 the hall.

20 B. WHEELAN: In the same building,
21 yes.

22 B. SHIREMAN: And you hand the

1 document. Okay.

2 So, in that letter you also told the
3 complainant that you must tie your complaint to a
4 specific accreditation standard number. So, does
5 that mean if they name the standard but they
6 don't put the number, you reject the complaint?

7 B. WHEELAN: No.

8 R. FUSE-HALL: No. More likely they
9 are not, they have not identified a specific
10 standard by which we would know what the basis of
11 the review is. So, we contact the institution to
12 ask them to respond.

13 B. WHEELAN: The point of that one,
14 Mr. Shireman, is just to make sure that the
15 complaint has to do with accreditation, and is
16 not just some something about which they are
17 unhappy with the institution about which we have
18 no input or control.

19 B. SHIREMAN: All right. I think you
20 can see what I'm getting at here. You've got a
21 very, very clumsy complaint process that seems to
22 be stuck in the 20th Century.

1 One of the other agencies that we
2 talked to in this session had a dropdown menu.
3 Makes it easy to identify what the, what the
4 items were.

5 It's pretty clumsy.

6 Let me cite another document. GG-5,
7 another response to a complaint.

8 This complainant alleged that a
9 college was, "graduating students who have not
10 completed the required education, clinical hours,
11 and grades in the nursing program."

12 The complaint apparently was signed
13 appropriately and made reference to specific
14 elements of the SACS's principles of
15 accreditation.

16 Also, it included grade center reports
17 with annotations from the complainant, and a
18 syllabus with particular items highlighted.

19 You rejected one part of the
20 complaint, not on the basis that you found the
21 school was actually in compliance with the
22 standards, but because, as you state in your

1 letter, because the complainant "provided no
2 narration that the institution is noncompliant
3 with."

4 What does that mean?

5 R. FUSE-HALL: So, on the form they
6 have an opportunity to at least give a brief
7 overview of what the concern is about. And
8 if they don't provide that narrative, then we
9 don't have a basis upon which to be able to ask
10 the institution to document compliance.

11 B. SHIREMAN: Then you rejected
12 another part of that complaint by explaining that
13 -- and this is a quote from your letter -- "while
14 your allegations are serious, they are not
15 documented."

16 It looks to me like they did provide
17 documentation. I don't see what it is. Did you
18 tell them what documentation was lacking? Did
19 you seek more documentation?

20 R. FUSE-HALL: What we usually do is
21 we inform them of the process. We also provide
22 them references to the standards and to our

1 resource manual which then specifically talks
2 about each component of a standard and what type
3 of documentation there is that needs to be placed
4 there.

5 So, I mean, I don't have the document
6 in front of me. But more likely than not, that is
7 evidence of the fact that we do notify our
8 complainants of the status of their application
9 which is required by our policies.

10 B. WHEELAN: And oftentimes there is
11 a follow-up phone call by the complainant to find
12 out what else that I need to do. So, you only
13 have one letter there. It is not unusual for us
14 to have two and three letters communicating with
15 the person who has filed a complaint.

16 B. SHIREMAN: Well, in this case
17 there's no evidence of a phone call. It looks
18 like you read the complaint. You do in your
19 letter say it raised serious issues. And did not
20 even send it to the school to ask them to respond
21 to this serious issue. Is that right?

22 B. WHEELAN: I don't know. Because I

1 don't know --

2 R. FUSE-HALL: That's not necessarily
3 follows. Once again, that's just a document
4 evidencing that we did get back with the
5 complainant about the status of their complaint.
6 That doesn't mean that we didn't do the full
7 process of looking at what the complaint talked
8 about, giving it to the vice president to ensure
9 that that vice president contacted the
10 institution to get some information back.

11 And based on what you're reading, it
12 sounds like we did contact the institution about
13 some of the other pieces that were there. We
14 just didn't contact the institution about that
15 specific allegation.

16 B. SHIREMAN: I'm not seeing any
17 evidence of that. I agree with you it is
18 possible. But I'm not seeing any evidence of
19 that in that particular letter.

20 I wanted to turn to some of the issues
21 raised in the third party comments. And I very
22 appreciate your detailed responses to this

1 document that you labeled Response to David
2 Halpern's Third Party Comments.

3 In the, in that document's discussion
4 about the conflict of interest at Keiser and
5 Everglades University, I did not see any
6 acknowledgment of the findings of the IRS audit
7 of Keiser Everglades.

8 That seems like a pretty important new
9 part of the story. Why was that not included?

10 B. WHEELAN: If I'm not mistaken, was
11 it within the time frame? The conflict of
12 interest --

13 B. SHIREMAN: Yes. The Everglades
14 Keiser 990 Form, which was filed 10 months before
15 your response, includes the admission about the
16 IRS audit.

17 B. WHEELAN: I'm not -- this, it came
18 up before the time for this particular
19 recognition. We followed our processes,
20 whatever, and, you know, were found to be in
21 compliance.

22 So, I'm not quite sure what the time

1 line is that you're asking me about right now.

2 R. FUSE-HALL: It had to do -- was
3 about a personnel matter. The conflict of
4 interest was about a personnel matter that was
5 outside the scope of our accreditation processes.
6 That's what I have in my notes.

7 B. SHIREMAN: Well, the issues in, in
8 the comments are, are about the relationships
9 among individuals, and individuals and its
10 decision in the Everglades Keiser Colleges group.

11 The IRS information came from -- comes
12 from the Everglades Keiser 990 Form. I assume
13 that you all do review those. And indicated that
14 the school had to pay financial penalties to the
15 IRS, and adjust its payment for property leases
16 because it was caught engaging in what is known
17 as an excess benefits transaction where they just
18 qualify individuals, which would be the kind of
19 conflict of interest that you are mentioning.

20 Do you know what a disqualified
21 individual is in the context of these IRS tax
22 exempt organizations?

1 R. FUSE-HALL: I'm sorry, I don't.

2 B. WHEELAN: Not a clue.

3 B. SHIREMAN: I will read it to you.

4 It's the IRS says, "A disqualified
5 person is any person who is in a position to
6 exercise substantial influence over the affairs
7 of a tax exempt entity."

8 And this is now my words. These are
9 people who are in a position to potentially
10 unfairly steer money to themselves. Tax exempt
11 entities are advised to stay as far away as
12 possible from any business transactions outside
13 of normal salary compensation. If they do have
14 such business relationships, they need to be
15 extra careful that the arrangements are at arms-
16 length rate or less.

17 But Keiser Everglades is saying, in
18 checking, checking these boxes on the tax form,
19 Part 4, Question 25, is that they violated this.

20 In the days before IRS' intermediate
21 sanctions -- we discussed this a little bit
22 yesterday -- this type of feathering of the nest

1 by an insider at a non-profit would lead to the
2 revocation of the tax exempt status of the
3 organization. It's a serious black mark for any
4 non-profit organization.

5 And SACS is a non-profit organization.

6 Dr. Wheelan, you sign the SACS 990 tax
7 return every year. Has your auditor or the IRS
8 ever told you that you have to say "yes" to the
9 question about excess benefits transactions?

10 B. WHEELAN: Not that I'm aware of.

11 B. SHIREMAN: Okay. Well, I looked at
12 the last 11 years of your returns, and not once
13 did you have that, that indication. In fact, you
14 said "no" to all of the questions about any kind
15 of business relationships with disqualified
16 individuals. You're insiders. You know, you're
17 not, you're not renting property from your vice
18 presidents.

19 So, clearly, you know how to keep the
20 non-profit clean.

21 Do you know how uncommon it is for a
22 non-profit to have to say "yes" to Question 25?

1 B. WHEELAN: I do not. I'm not an
2 accountant or IRS.

3 B. SHIREMAN: All right. Well, it is
4 extremely rare.

5 I asked a tax law expert. And they
6 said out of the 343,000 charities that are large
7 enough to have to file the full 990 last year,
8 fewer than 100 reported an excess benefits
9 transaction. That's one-fortieth of 1 percent.

10 Why do you think that SACS did not
11 catch this problem at Keiser Everglades, this
12 conflict of interest, even with journalists, and
13 people like me, and David Halpern raising
14 questions about it over the past 10 years? Why
15 did it only come out in this IRS review in the
16 last year or two?

17 B. WHEELAN: Again, I'm not the IRS.
18 And so, our concerns would be accreditation
19 issues, not IRS issues.

20 B. SHIREMAN: Well, it certainly is an
21 accreditation issue if an insider to a college is
22 steering money away from students and into their

1 own pockets, which is what this appears to, to
2 have been.

3 I'm going to ask about some of the
4 different points where it seems like it should
5 have come up. And I recognize that for some of
6 the earlier ones of these, well, you may say,
7 well, that was an earlier period.

8 But the implications of these millions
9 of dollars continues to this day. And so it's
10 whether, whether it should have been caught in
11 2011, or 2019, or 2022, it remains an issue.

12 So, when this transaction occurred in
13 2011, this transaction being the purchase of
14 Keiser -- of the for-profit Keiser University by
15 the non-profit Everglades College and University.
16 When that occurred in 2011, did you have any
17 concerns about the president of a non-profit
18 institution that you had just accredited the
19 prior year, arranging for that non-profit to
20 purchase his own for-profit college for \$300
21 million?

22 B. WHEELAN: No.

1 B. SHIREMAN: Did it concern you that
2 he was selling only the intangible assets, that
3 he would keep the real property and commit the
4 tiny \$20 million non-profit to non-cancelable
5 leases requiring rental payments of more than \$25
6 million per year?

7 B. WHEELAN: No.

8 B. SHIREMAN: Do you know of any other
9 non-profit school that rents out buildings owned
10 by its president?

11 B. WHEELAN: I don't know of any non-
12 profit or for-profit ones that do.

13 B. SHIREMAN: Did your experts analyze
14 the audit and appraisal documents that they
15 indicated in a 2015 New York Times story, they
16 said there were two independent appraisals that
17 they were on.

18 Did you review any of these audit or
19 appraisal documents when you reviewed the
20 transaction in 2011?

21 R. FUSE-HALL: This did come up during
22 their, their reaffirmation review. And so, and

1 they were found to be compliant, if I am not
2 mistaken.

3 But we were advised by the staff that
4 we didn't have to address any questions that were
5 outside of the current review process. So,
6 that's why we made the statement that if it was
7 outside review of the current review process,
8 then we didn't address that in this particular
9 petition.

10 I think in the overall complaint that
11 was sent forward by Mr. Mazell, not Mr. Halpern,
12 but Mr. Mazell, we did go back for the full
13 review of each and every one of those, and
14 documented what the review was, whether they have
15 financial noncompliance, and what the subsequent
16 reviews were for those noncompliance issues.

17 B. SHIREMAN: The transaction happened
18 in 2011. It's still not clear to me whether -- I
19 mean, you had one of your schools taking on -- a
20 \$20 million-a-year school taking on \$300 million
21 in debt plus noncancellable leases. You had
22 another institution that was changing its

1 ownership. It seems to me those should have
2 triggered pretty serious reviews. And it's not
3 clear to me what actually happened there still.

4 In 2012, there was a major report from
5 the U.S. Senate Health Committee that cited the
6 Everglades/Keiser deal as a suspicious
7 transaction. Did that Senate report in 2012
8 prompt a review by SACS?

9 R. FUSE-HALL: We did review them in
10 2011, and not only did staff review them to look
11 at the documentation, but the peer-review process
12 was used to it and our Board approved it. So it
13 got reviewed as our policies and procedures
14 indicated that it would.

15 It was found that we had done our due
16 diligence. And at the time in 2012, there was a
17 lot of concern by the Senate and the House on all
18 for-profit movements from for-profit to not-for-
19 profit. That just happened to be the one that we
20 had at that particular point. But we, with our
21 review and the last recognition, were still found
22 to be compliant in the review process that we

1 used.

2 B. SHIREMAN: So I think your response
3 to David Halperin has some quotes that must have
4 been from that -- perhaps from the 2011 review,
5 maybe 2015 review. And it notes that your
6 standards do require that a governing board be
7 free from undue influence and protects the
8 institution from such influence.

9 But the visiting Committee and then
10 your Board seemed to be unaware of the issue of
11 the Chancellor's business ties. Instead, they --
12 and then even in your response -- make a strange
13 reference to Keiser University and Everglades
14 University and Everglades College Incorporated
15 being different entities. What are you talking
16 about there?

17 It seemed like what you had been
18 worried about was, oh, is Keiser University
19 trustees different from Everglades University
20 trustees -- but ignoring the conflict with the
21 Chancellor's business arrangements.

22 R. FUSE-HALL: Again, Mr. Shireman, I

1 am not going to be able to answer those questions
2 because that is not something for which I'm
3 prepared for this particular meeting today since
4 that happened back in the last recognition.

5 B. SHIREMAN: Right. But it is in
6 your response to David Halperin where you do say
7 in there that you do not accredit Everglades
8 College Incorporated, which is an odd statement
9 because the tax return for Everglades College
10 Incorporated says, doing business as Keiser
11 University and Everglades University. They are
12 one and the same.

13 Keiser University's catalog says,
14 Keiser University is a not-for-profit 501(c)(3)
15 corporation incorporated in the state of Florida.
16 Keiser University is managed and controlled by
17 the Everglades College Incorporated Board of
18 Trustees, which is the legal entity responsible
19 for policy and procedure, promulgation, review,
20 and amendments.

21 So the information you provided in
22 your response to David Halperin creates a fiction

1 of there being these different entities and that
2 that was somehow the issue they said was okay,
3 but has no mention of the Chancellor's business
4 relationships. So it appears that -- I didn't
5 see any evidence there that your review even
6 addressed the issue that has now emerged as a
7 problem in the IRS report.

8 Let me get a few other items into the
9 record here. The financial statements that --
10 filed by the schools eventually did identify and
11 provide some information that indicated some of
12 the evaluations did not reveal who supposedly did
13 the audits or assessed the values. But to
14 justify the \$535 million value of Keiser
15 University, including the \$300 million purchase
16 price, they included \$50 million value for the
17 name Keiser University.

18 Did you review and approve that
19 concept, that it was worth \$50 million to
20 Everglades University to be able to own the name
21 Keiser University?

22 R. FUSE-HALL: We reviewed whatever

1 documentation they submitted.

2 B. SHIREMAN: But what documentation
3 did you ask for? Did you ask for the appraisals?

4 R. FUSE-HALL: Again, Mr. Shireman,
5 that happened in the last recognition, and I'm
6 not prepared to respond to that today.

7 B. SHIREMAN: All right. Well, I am
8 -- I'm concerned that -- both with the complaints
9 that we identified earlier and with the
10 information that was raised by Mr. Halperin, by
11 the New York Times, by the Senate Health
12 Committee, by me and others, that this issue of
13 the conflicts of interest at Keiser University
14 and Everglades University an issue that has now
15 been identified at least by the IRS as a real
16 problem -- somehow SACS did not see despite
17 numerous points where it seems like it should
18 have come up.

19 Given the way that it seems like you
20 try to avoid handling complaints, I'm concerned
21 that this was purposeful. And I'm hoping this
22 will become a part of the compliance review.

1 Thank you. That's the end of my questions for
2 now, but sure, you can respond.

3 R. FUSE-HALL: Mr. Shireman, I assure
4 you we do not shy away from complaints. We get
5 more complaints than Carter has liver pills,
6 which is one of the reasons that we asked people
7 to sign them, so that we know that they are
8 legitimate complaints. And I can give you any
9 number of institutions that have gotten letters
10 regarding complaints that have follow-ups that we
11 have done.

12 In this particular issue, I would
13 have to go back and look at our records to see
14 exactly what happened in 2011. I put my
15 reputation on it that we followed the appropriate
16 procedures and policies that we had in place. If
17 there have been questions about ownership and
18 owner/president somehow trying to pull the wool
19 over somebody's eyes, we would have interrogated
20 that person and looked at all the process and
21 everything else.

22 We don't always like what our

1 institutions do. As far as putting in new
2 programs or merging with other institutions, we
3 sometimes think that it's shortsighted, but we
4 have to follow our policies and procedures in
5 allowing these things to move forward.

6 J. DERBY: Let me just interject here,
7 Bob. I understand that you were asking questions
8 that were outside this current review process
9 because you're concerned about their treatment of
10 complaints. But I think it's important going
11 forward here to keep the questioning inside the
12 current --

13 B. SHIREMAN: I'm not sure that -- so
14 I did clarify that these are ongoing financial
15 issues at this institution that began with the
16 transaction in 2011 but are ongoing issues. And
17 frequently, it is the case that information about
18 things that happened in the past does not emerge
19 until later, and certainly, that's type of
20 information that we want to take into
21 consideration. And the IRS action is quite
22 recent and within the period that SACS should

1 have known about it, in any case.

2 J. DERBY: I appreciate that, but I
3 think it's a problem for an agency such as Dr.
4 Wheelan's not anticipating the kind of questions
5 that'll be asked and therefore not coming with
6 the kind of --

7 B. SHIREMAN: They did discuss it in
8 their response to David Halperin. So I didn't
9 raise anything that wasn't in the context of
10 that, of their response to the third-party
11 comments. So I appreciate what you're saying,
12 but it was all within that realm.

13 J. DERBY: Okay. Thank you. Do you
14 have any other questions?

15 B. SHIREMAN: Not for now. Thank you.

16 J. DERBY: Okay. Great.

17 Kathleen, you're up.

18 K.S. ALIOTO: There we go. Thank you
19 for your work for so many years on behalf of the
20 students under your service. Now, one of the
21 things that you talked about and that was
22 repeated by your colleague who took the plane

1 ride in order to testify today was the challenge
2 with first-generation, low socioeconomic, open
3 admissions, and all the kinds of working parents
4 and all of the profile of the many students who
5 are not able to graduate but can graduate in
6 eight years and so forth.

7 But I'm looking at -- for one thing,
8 I wonder if -- you said you had started in 1990,
9 and I certainly sympathize because I've spent my
10 entire career working with low-income people, and
11 as most of our colleagues who are here today, we
12 understand the challenges.

13 I wondered in terms of your strategies
14 if there has been any goals and -- like any
15 particular institutions that you have assisted
16 that there has been a breakthrough in terms of
17 what has happened to a group of students because
18 when I look at the scorecards, it's quite dismal
19 what has happened.

20 For example, with Alabama
21 Agricultural, you have almost 6,000 students with
22 \$66 million in volume and only a 29 percent

1 graduation rate, and students who are graduating
2 have 39,748 in debt. So -- the median debt. So,
3 well, my question is, where is the bright light?
4 Is there a bright light? You've obviously
5 dedicated your life to trying to bring light in
6 the midst of poverty and challenges. Have there
7 been any strategies -- and you went through, both
8 of you went through, quite clearly what
9 strategies you've taken. But has anything worked
10 with groups of students?

11 B. WHEELAN: Alexi, do you want to
12 identify any particular -- specifically HBCUs,
13 since that's what we've been talking about, or
14 small college that has made a gigantic leap?

15 A. MATVEEV: At this point, I cannot
16 provide a specific name of the institution. But
17 in 2016, we engaged in a project that looked at
18 institutions with the lowest graduation rates,
19 from both the baccalaureate level and the
20 community college level.

21 And many of those schools, or I would
22 say overwhelming majority of those schools,

1 enrolled high proportion of low-income students
2 or Pell Grant recipients. And if we look at the
3 progress that was made by those schools in the
4 last five years, it's quite substantial.

5 For example, baccalaureate
6 institutions with the lowest graduation rates
7 since 2016, they improved 33 percent between 2016
8 and 2020. But associate-granting institutions
9 that were on the threshold in 2016 -- we have
10 hundred institutions -- they made improvement of
11 66 percent.

12 B. WHEELAN: We also had -- one of our
13 community colleges here in Georgia merged with
14 Georgia State University. Georgia State
15 University had, like, an 80 percent graduation
16 rate. Georgia Perimeter College was in the
17 single digits. They merged together, which was a
18 strange arrangement, you would think, in the
19 first place.

20 But now the overall graduation rate is
21 still in the 80 percent, which means that those
22 community college numbers have come up. And it's

1 because they put in a very successful student
2 success program. I alluded to that one earlier --
3 whether they've got early intervention, whether
4 they have counselors who are going in. And so
5 that's probably the poster child for
6 demonstrating a major increase in graduation
7 rates.

8 Other rates are much smaller, but they
9 are moving in a more positive direction. The
10 other challenge is many of these students are
11 part-time students, and it takes them longer.
12 They're taking fewer hours every semester, so it
13 takes them longer. So it's going to be a few
14 more years before we see a significant increase
15 in those numbers, but they all seem to be going
16 in the right direction. They're all seeming to
17 increase. We only had one or two that fell below
18 the rate that they had had back in 2016.

19 K.S. ALIOTO: That is an interesting
20 model if you have -- I worked at City College of
21 San Francisco for 15 years, and so I certainly
22 understand the challenges, although the

1 statistics at that point were that 48 percent of
2 the students in BA programs had attended
3 community colleges first. So community colleges,
4 to my mind, are the unsung heroes or heroines of
5 the system.

6 So I was going to come in with all of
7 these dreary statistics about the Agency, but I
8 really feel that we're all trying to do the same
9 thing, which is to benefit students and humanity.
10 And so I'm thinking -- after some chastising by
11 some of my colleagues, I'm thinking that I need
12 to be more respectful of other human beings and
13 what we're all trying to accomplish. So thank
14 you for your work.

15 B. WHEELAN: One of the things that
16 had helped some of those numbers, if you will, is
17 the fact that (audio interference) now includes
18 the transfer rates because -- especially in the
19 community colleges, because many students never
20 intend to graduate when they go to a community
21 college, but they do plan to transfer. And so,
22 now, having the ability to add that transfer

1 number on there does indeed contribute positively
2 to the completion rate of those institutions.

3 K.S. ALIOTO: Okay. I just have one
4 more question, which is not really -- but my
5 interest is zero to three. Are there any
6 programs that you can highlight that are working
7 with parents and children from birth to three
8 when brain development is so critical?

9 B. WHEELAN: I'm sure some of our
10 institutions do. I'm not personally familiar
11 with which ones they are. I can certainly find
12 out and send you a note if you want me to.

13 K.S. ALIOTO: That would be great.
14 Thank you.

15 A. MATVEEV: And if I may make a brief
16 comment, Dr. Wheelan mentioned that the
17 Department of Education spoke about introducing
18 the completion-plus-transfer-out rate. And I
19 believe Alabama and Miami University was
20 mentioned. And if we look at the combined
21 transfer and completion rate, it's 65 percent,
22 which is significant. And as I mentioned, based

1 on my experience at HBCUs, many students come to
2 HBCUs just to experience that warm and nice
3 family-like culture.

4 K.S. ALIOTO: Okay. Thank you.

5 J. DERBY: Okay. Steve?

6 S. VAN AUSDLE: Thank you. And let me
7 start by saying when I read your petition, I was
8 kind of taken aback. I had to shut it down and
9 come back to it a couple times, saying, how are
10 we going to address this situation where about
11 one-third of the criteria weren't completely
12 mapped?

13 But you have done a very good job of
14 kind of explaining how you've made a lot of
15 progress on the 90-plus criteria we have. And
16 what I want to focus on is adverse actions. I
17 was thinking about the scope of your
18 organization, and it all -- I assume you've had
19 situations where you've had to make decisions
20 regarding an institution's future that makes
21 everyone pause. How many adverse actions might
22 you undertake in a year?

1 B. WHEELAN: Well, I have a sheet of
2 paper here that can show actions on removal from
3 accreditation. That's the most severe. We've
4 had four during this review cycle. We've imposed
5 or continued probation for good cause for 42
6 institutions. We've continued probation for 20.
7 We've imposed/continued warning for 85.

8 But we've also removed 75 institutions
9 from sanctions during that same time. So they're
10 getting better. We've gone from nine in one year
11 down to none the next year. We have not dropped
12 an institution from membership in the last three
13 years. Does that answer your question?

14 S. VAN AUSDLE: Have you any appeals
15 in the process or --

16 B. WHEELAN: No.

17 (Simultaneous speaking.)

18 B. WHEELAN: Nope.

19 S. VAN AUSDLE: Really?

20 B. WHEELAN: Not for the last three
21 years.

22 S. VAN AUSDLE: Well, you're going to

1 keep my questions pretty brief, then. This one
2 thing in here is your appeals process might not
3 be as up to date as you want it to be or as Dr.
4 Harris wants it to be. And it appeared that
5 there wasn't documented evidence of the
6 competence of your Appeals Committee members.
7 Maybe that's an irrelevant question until you
8 have an appeal. So I'm just going to assume
9 you're going to work with Dr. Harris and get
10 those things squared away.

11 B. WHEELAN: We will indeed work with
12 Dr. Harris.

13 S. VAN AUSDLER: Thank you. That
14 concludes my questions.

15 B. WHEELAN: Thank you.

16 J. DERBY: Thanks. Jennifer?

17 J. BLUM: Hi. So, first of all, based
18 just on what Steve said, I will say I've always
19 had a lot of respect for SACS's proactivity with
20 regard to adverse action. So some of them have
21 always been complex and difficult. So, from an
22 enforcement standpoint, I have respected that

1 over the years.

2 I will say I want to bifurcate with
3 respect to Bob. I want to bifurcate his lines of
4 questions because I do want to lend some support
5 and maybe probe a little bit further on your
6 complaint procedures. And I was looking as he
7 was talking -- and I had already looked at this
8 in advance, but I looked again while he was
9 talking at the Department's criteria 602.23(c).
10 And while I understand by the literal reading
11 that you might be in compliance, I would, I
12 guess, urge the Agency to take another look at
13 how to comply with that standard because the
14 first sentence is, review in a timely, fair, and
15 equitable manner any complaint received against
16 an accredited institution or program that is
17 related to the Agency's standards or procedures.

18 Now, I understand. I do understand
19 that you want it to be related to an
20 accreditation standard. I respect that. The
21 question, I think, on the table is who's going to
22 make the judgment call. And I can't leave it to

1 the student to figure out what accreditation
2 standard their complaint might be toward an
3 institution.

4 And I also get that -- and having been
5 in this world a long time, I also understand that
6 there are many superfluous -- I think one Agency
7 yesterday talked about people filing complaints
8 about grades and things like that. So I totally
9 understand that there are also superfluous
10 complaints.

11 And yet I feel really strongly -- and
12 I guess I'm saying this to both the Department
13 and the Agency. I feel really strongly that in
14 interpreting what is compliance with regard to
15 602.23 -- my eyes are so bad -- C or E, whichever
16 it is -- that first sentence -- that it not be
17 left to the Complainant to determine whether
18 their complaint neatly fits one of the
19 accreditation standards or accreditor's
20 standards, and that rather the Agency take on
21 that task.

22 And I think over the course of the

1 week, there's been a couple of examples where
2 that does occur. And so we know it is possible
3 to be done. And so I lend support because I
4 think that's really -- on that first line of
5 questions by Bob, I think that's really where he
6 was heading, in part, at least. And I fully
7 support that.

8 And I would almost say that because of
9 the way you were turning down some complaints, at
10 least for me, there's great pause about
11 compliance with that section. And yet I
12 understand that the literal interpretation of
13 that standard might be that that's left for the
14 Complainant to do. I just would hope that an
15 Agency would be sympathetic to the
16 consumer/student side of that --

17 B. WHEELAN: May I respond, Jenny?

18 J. BLUM: Of course.

19 B. WHEELAN: About 60 percent of the
20 complaints come in, start with a telephone call
21 by somebody who says, I want to file a complaint.
22 And whoever answers the phone graciously listens.

1 If it's too involved, we immediately send them to
2 the person in Rosalind's office who handles
3 complaints.

4 I have seen her listen for an hour to
5 somebody. I have personally listened an hour to
6 people. And we have often told them, this sounds
7 like it's an accreditation complaint, and here is
8 the standard that it would respond to. You need
9 to go to our website, pull down the form that you
10 need to fill out, document that -- your concerns
11 against the standard. Read the standard so you
12 can see what it's asking for, and show that.

13 Most of the complaints that come in
14 are handled that way. Seldom do we just get
15 somebody who has sent in a complaint. It is
16 always preceded by a telephone call saying, is
17 this the right thing? Many times, the
18 documentation just isn't sufficient. Like you
19 said, the great thing -- we get people -- they
20 changed my grade, and this says that they have to
21 have a policy on grade changes, and I don't see
22 this policy.

1 So they just really are -- they run
2 the gambit from the sublime to the ridiculous.
3 But I assure you that no complaint is just
4 ignored. We walk them through how to fill it
5 out. We've told them how to mail them to us.
6 Because we do want to make sure that it is a
7 legitimate complaint, we do ask for original
8 signatures.

9 We have gone back and forth about
10 having folks be able to send in an electronic
11 complaint. Our attorney had suggested to us that
12 we still don't know whether it's a legitimate
13 complaint because it could come from any email,
14 and you put our staff and the institution through
15 a bunch of research unnecessarily if we can't
16 document that. So, this way, we can at least --
17 we feel comfortable doing that. But I promise
18 you we don't ignore any formal complaint that
19 comes in.

20 J. BLUM: Well, no -- Dr. Wheelan, I
21 appreciate that. But none of that is actually
22 transparent in the form of your policy and

1 practices. I totally understand that it's
2 accurate, and I'm not questioning your process at
3 all. I believe that you probably do take every
4 complaint into account. My point is that from a
5 -- and again, I'm almost saying this equally to
6 the Department in terms of how you interpret your
7 own criteria -- that I think in this day and age,
8 we ought to not assume that the student or other
9 Complainant knows the standards well enough to be
10 able to say, my complaint refers to this issue.

11 And I appreciate that you tell them
12 that and sort of help feed them, but I think one
13 way of really handling this is to have a policy
14 that expresses that the Agency will do that
15 probing and not require a student to do that
16 probing or require them to re-file a complaint.
17 And I think -- Bob mentioned the 20th century. I
18 happen to agree that I think we could go to the
19 electronic age as a general policy.

20 I do want to make one last comment
21 about -- like I said, I was bifurcating Bob. On
22 the second issue, I would just say, without going

1 back over it, I do really want to -- I reflect a
2 lot on the triad and the roles of the triad and,
3 in this case, also the IRS. And I would say that
4 there are many stopgaps or places where -- other
5 than facts, where if there were questions, those
6 questions were not appropriately -- and I'm
7 saying if there were questions, but there were --
8 the Department, the state, the IRS.

9 And so I am uncomfortable in the
10 context of any conversation with regard to a
11 particular situation, a situation in a review
12 process of an Agency. I'm uncomfortable sort of
13 putting it at the feet of an Agency when one
14 could have a long conversation about the other
15 Agencies in the triad, the other legs in the
16 stool, if you will, and their processes for
17 approving.

18 So I don't want a comment back. I
19 just wanted to express that point of view for the
20 record.

21 J. DERBY: Ronnie, you're next.

22 R. BOOTH: Thanks. Just a comment.

1 One of the common themes that's come up
2 throughout all of our -- I think every
3 accrediting conversation I've been engaged in
4 since I've been on this Board is student loan
5 default. We asked those questions of Dr.
6 Wheelan. Certainly, that's an issue for,
7 firstly, every organization we've accredited.
8 That conversation has come up one way or another
9 in the terms of motions or pieces of motions or
10 just strong suggestions to our accrediting
11 bodies.

12 But I guess I'll have to express some
13 frustration. And, George, I know we can't lobby.
14 But from a -- it appears that though we've pushed
15 those issues with our accrediting bodies, that
16 many times their and our hands are tied because
17 of federal regs and what we can and cannot do.

18 As a former college President who once
19 made a phone call to Department of ED and said,
20 no, you can't say no to a student unless there's
21 fraud involved -- basically, had to give money
22 away that we didn't feel like was needed. But

1 virtually every accrediting agency now is dealing
2 with the fallout of that. Every college is
3 dealing with the fallout of some other loose
4 rules, particularly in the last decade.

5 And the same thing to some of Bob's
6 comments and some of his passion, if you will,
7 regarding proprietary. The federal regs are what
8 they are, and sometimes we don't like them, but
9 they allow a lot of things to happen that we may
10 or may not agree with. But we can't change those
11 because of the federal regs are what they are.

12 So I guess I would say on walls, on
13 proprietary, on other -- I have very strong
14 opinions, but we have a very narrow window, if
15 you will, in terms of what we can do about what's
16 happening in the street. And since we can't
17 lobby, we just have to work with the rules we
18 have.

19 So I think not just with SACS, but I
20 think this is the first regional accrediting body
21 that I've been engaged with since I've been on
22 NACIQI if my memory is correct. May be wrong,

1 but I think it's the first -- I think we're going
2 to -- maybe not to the degree, but I think we're
3 going to run into some of the same issues across
4 the country as we talk with other accrediting
5 bodies because of loan issues and because of
6 proprietary issues, many of which are outside of
7 our control, federal rules and routes and things.

8 We're going to have to live with the
9 outcome until we get some more direction at the
10 federal level, I think. So I think, George, what
11 I'm saying is sometimes we're sort of fighting
12 with one hand tied behind our back, if you will,
13 given that we can only control what we can
14 control. And Department regs and what Congress
15 does is very outside of our ability to control.

16 So, even though I think today I've
17 heard a lot of frustration on some of those
18 issues, I believe we're not going to see the end
19 of the issue just with this accrediting body. I
20 think they're going to play out with our other
21 regional because they're going to be the same
22 kind of institutions and the same kind of issues.

1 So thank you, Madam Chair.

2 J. DERBY: Okay. Thank you.

3 We go now to third-party comments.

4 And I don't have the list, George. Can you help
5 me with this? There's probably a list of third-
6 party commenters, and they'll come on
7 sequentially. Is that correct?

8 G.A. SMITH: It's on the bottom of the
9 agenda, Jill. It's on the agenda right under it.

10 J. DERBY: I'm not finding that,
11 George. Can you call them out?

12 George, are you there? Are you
13 hearing me?

14 G.A. SMITH: Yes.

15 J. DERBY: Okay. George, I'm not
16 hearing you. I just printed out a copy of my
17 agenda. So I may not have the names you're
18 referring to. Could somebody call them out, and
19 then we'll take them sequentially?

20 R. BOOTH: The first is Dr. Kyle
21 Southern.

22 J. DERBY: Thank you. All right. We

1 look forward to your comment. Are you connected?

2 R. BOOTH: The next is Robert Boyd.

3 J. DERBY: Okay.

4 (Simultaneous speaking.)

5 J. DERBY: Thank you. That's my
6 request.

7 George, do you have that?

8 G.A. SMITH: The first is Dr. Kyle
9 Southern.

10 J. DERBY: Okay. Yes. Okay.

11 G.A. SMITH: Jill, can you hear me
12 now?

13 J. DERBY: Now I can hear you. Thank
14 you.

15 G.A. SMITH: Okay. Terrific. I'm
16 sorry. Our speakerphone that we're using in the
17 room just dropped. So what we're going to do --
18 our apologies. Monica is going to call out the
19 names of the people for you. And so first up is
20 David Halperin, and he'll have three minutes to
21 make his comments. Okay?

22 J. DERBY: Okay. And when I see his

1 picture on the -- here he is. So please go ahead
2 --

3 (Simultaneous speaking.)

4 J. DERBY: David, you have three
5 minutes. Go ahead, please.

6 D. HALPERIN: Thank you all for the
7 work you're doing. I appreciate SACS's job is
8 challenging. Accreditors are caught between
9 demands of schools, the Department, advocates,
10 and now for SACS Florida politicians. But
11 accreditors must take seriously their obligations
12 as gatekeepers for federal aid because the
13 students' futures are in their hands.

14 When schools offer poor quality or low
15 integrity, accreditors must act, ensuring
16 compliance with their standards and the law. And
17 when it comes to Keiser University and related
18 schools, it appears SACS has allowed abuses to go
19 on with impunity.

20 SACS claims most of the allegations
21 I've raised in my written comment concerned the
22 distant past. Not true. Keiser settlements with

1 the Justice Department and Florida Attorney
2 General over deceptive practices were in the last
3 cycle but remained important context. There were
4 no apparent consequences from SACS. A central
5 abuse, the improper conversion to nonprofit that
6 greatly enriches the Keisers, is ongoing.

7 Just as SACS was wrong to accept the
8 conversion in the first place, they were wrong to
9 not address it effectively in this cycle. That
10 the conversion deal is improper was reaffirmed in
11 the past year when a Keiser IRS filing and House
12 Education Committee letter collectively revealed
13 that the IRS found some leases between Keiser and
14 companies and the nonprofit school were above
15 market value, and the IRS imposed penalties.

16 Other conduct I've described has been
17 publicly reported in this cycle. This includes
18 the overlap of personnel and resources between
19 nonprofit Keiser University and Southeastern
20 College, a for-profit school owned by the
21 Keisers; deceptive recruiting at Keiser
22 University as reported to me by numerous staff;

1 personal misconduct by Keiser executives; the
2 allegation that Keiser staff deceived a SACS
3 delegation visiting the school's Shanghai campus;
4 the naming of Arthur Keiser's son just after
5 obtaining his doctorate from a for-profit school
6 as Executive VP for Keiser's graduate school --
7 he may well be an outstanding administrator and a
8 scholar, but such a hire is more suited to a
9 family-owned business than a nonprofit college
10 with an independent Board -- and finally, the
11 replacement of the Webber St. Andrews Board
12 mostly with people connected to Arthur Keiser;
13 the naming of a Kaiser employee as a St. Andrews
14 President; and the co-location of St. Andrews new
15 satellite campuses with locations of the Keiser's
16 own for-profit, Southeastern.

17 Senior members of Congress this year
18 have called on the Department to investigate
19 Keiser University. What has SACS done? If the
20 answer is not much, and if NACIQI and the
21 Department don't do much, then the system is
22 failing taxpayers and students. I appreciate

1 your time. Thank you.

2 J. DERBY: Thank you very much.

3 And to go to the next one, George,
4 I'll need help with the timing here.

5 G.A. SMITH: Yeah. Okay.

6 (Simultaneous speaking.)

7 G.A. SMITH: Thanks, Jill. We're
8 doing that for you.

9 J. DERBY: Thank you very much.

10 M. FREEMAN: The next commenter is
11 Robert Boyd.

12 R. BOYD: Yes. Good afternoon,
13 everybody. Can you hear me?

14 J. DERBY: Yes.

15 R. BOYD: Okay. Thank you for having
16 me. I'm Bob Boyd. I'm the President of ICOF,
17 which is the Independent Colleges and
18 Universities of Florida. I'm here to speak in
19 strong support of SACS.

20 We are 30 independent, not-for-profit
21 charters in Florida -- institutions in Florida.
22 All of us are SACS accredited. We range in size

1 -- Keiser is actually one of our members that's
2 the largest institution in Florida from an
3 undergraduate point of view all the way down to
4 little Beacon College in Leesburg, which
5 specializes in educating students with learning
6 disabilities.

7 So we have a very diverse group of
8 students. As I said, we are all SACS accredited.
9 We recognize that for over 100 years, SACS has
10 accredited many preeminent institutions in the
11 U.S., including in Florida. A lot of our members
12 are in that category, like Rollins College and
13 Stetson and Eckerd and University of Miami.

14 SACS has been a measure of quality for
15 the academic institutions. They play a vital
16 role in our ability to provide quality education.
17 We know their core values and their core mission
18 is integrity, peer review, voluntary membership,
19 transparency, and accountability. So I wanted
20 to say today that we support their goals. Two of
21 my member institutions' Presidents are on their
22 Board. It's Dave Armstrong of St. Thomas

1 University and Keith Wade of Webber International
2 University.

3 The ICOF Schools in Florida -- just
4 to give you a very quick background, we have
5 three HBCUs. I know we were talking about HBCUs
6 earlier. We have six HSIs. We produce 20
7 percent of all the BA degrees of Florida, 45
8 percent of all the professional degrees, and in
9 the workforce crisis I think we're all facing, we
10 produce 25 percent of the nurses and 25 percent
11 of the teachers in Florida.

12 So, for us, SACS is a valuable
13 resource for our members. We meet on a quarterly
14 basis with Dr. Wheelan. We do a Zoom call with
15 her and the other sister organizations. Claude
16 is the Chair of the Tennessee TICUA organization.
17 We have a robust conversation every quarter with
18 SACS. Regarding the Florida law that was passed,
19 that specifically does not affect the ICOF
20 schools. All of the ICOF schools support SACS.
21 No ICOF school that I've talked to is planning on
22 leaving SACS or has any criticism of SACS.

1 G.A. SMITH: Thirty seconds left.

2 R. BOYD: And I just wanted to say on
3 behalf of the comments regarding Kaiser, they're
4 one of our key members. They're, as I said, one
5 of the largest producers of nurses in Florida and
6 a key contributor to the independent sector in
7 Florida. So I appreciate the time you've given
8 me and giving me the opportunity to make these
9 comments about SACS. Thank you.

10 M. FREEMAN: Mr. James Haynes is next.

11 J. HAYNES: Good afternoon. My name
12 is James Haynes, and I'm the Federal Policy
13 Director with the nonprofit organization Veterans
14 Education Success. We work on a bipartisan basis
15 to advance higher education success for veterans,
16 service members, and military families and to
17 protect the integrity and promise of the GI Bill
18 to have their federal education programs.

19 I would like to provide a brief
20 comment about the Southern Association of
21 Colleges and Schools Commission on Colleges, or
22 SACS. Many observers in higher education are

1 justifiably concerned about potential political
2 intrusion into matters under SACS's purview.
3 SACS's expertise in all areas related to academic
4 matters, such as curriculum and assessment,
5 should be given deference.

6 We wholeheartedly believe in academic
7 and accreditor autonomy. The ability of SACS and
8 all accreditors to fulfill their mandate without
9 political interference is essential. We thank
10 the Department of Education for releasing
11 guidance earlier this week to help prevent a race
12 to the bottom in accreditations.

13 Having said this, SACS has fallen
14 short by submitting incomplete materials to the
15 Department for recognition review. The
16 Department staff's report shows SACS did not meet
17 the requirements for more than 20 sections in the
18 staff review. This is concerning, given how
19 Student Veterans and other federal agencies like
20 the Department of Veterans Affairs rely on the
21 quality assurance and program integrity oversight
22 SACS provides.

1 If these shortcomings are the result
2 of lack of staffing reinforces the need for SACS
3 to have an adequate number of employees and an
4 appropriate administrative structure in place so
5 that they are capable of fulfilling their vital
6 function.

7 While compliance with the Department's
8 requirements of recognition is important, the
9 ultimate goal is to ensure that institutions
10 accredited by SACS provide worthwhile education
11 to their students and do not engage in predatory
12 practices. I want to highlight a recent Third
13 Way blog that examines student outcomes at SACS-
14 accredited colleges.

15 Third Way found that four out of ten
16 SACS-accredited institutions leave the average
17 low-income student earning only about 5,000 more
18 compared to a high school graduate with no
19 college experience. Overall, close to one
20 billion in taxpayer dollars goes to SACS-
21 accredited institutions where low-income students
22 earn even less than a high school graduate.

1 These findings are troubling,
2 especially for student veterans who may be using
3 their hard-earned GI Bill benefits at
4 institutions that potentially leave them worse
5 off. Dozens of student veterans and others
6 testified this past year during the Department's
7 multiple negotiating rulemaking sessions,
8 detailing predatory practices occurring in higher
9 education.

10 SACS and other accreditors should give
11 serious consideration to student complaints as
12 indicators of potentially predatory practices.
13 Further, under 34 CFR, Section 602.20, regulatory
14 and law enforcement actions against an
15 institution should trigger accreditor oversight.
16 We want to highlight this provision and reinforce
17 the importance of accreditor oversight in order
18 to ensure proper gatekeeping --

19 G.A. SMITH: Thirty seconds left.

20 J. HAYNES: -- of the Title IV
21 program. Thank you very much for the opportunity
22 to comment.

1 J. DERBY: Thank you.

2 M. FREEMAN: Dr. Jonathan Alger? I
3 think he may have had to leave.

4 R. FUSE-HALL: He did.

5 M. FREEMAN: He did? Okay.

6 R. FUSE-HALL: He did.

7 M. FREEMAN: And I know Dr. Cabrera
8 had to leave. So Dr. Vann Newkirk is next.

9 V. NEWKIRK: My name is Vann Newkirk.
10 Thank you. I'm here to speak on behalf of SACS,
11 and I'm so glad to be here. I'm the 17th
12 President of Fisk University, which is the oldest
13 institution of higher education in Nashville,
14 Tennessee.

15 And what's so important about our
16 institution? We've had so many famous graduates,
17 and I won't name all of them, W.E.B. Du Bois and
18 Nikki Giovanni among others. But one thing about
19 our institution, it's an HBCU, but the
20 integration -- many HBCUs lower standards. We
21 never lowered the standards, and what we did over
22 the years is that we got into a situation of

1 (audio interference) our students that had a high
2 discount rate in the institution.

3 And one of the things that SACS was
4 able to help us do at this institution was to
5 help us to fix the institution and make it a
6 stronger place, an institution that's viable.
7 Peer review helped us through the whole process.
8 We got new process of doing strategic planning.
9 We got new process of looking at the stability of
10 the institution. We got new process to look at
11 strengthening student profiles.

12 And what we can say is that because of
13 this process, this institution which was founded
14 in 1866, one year after the Civil War, an
15 institution that was an agenda item on the way
16 out of being accredited. And on the way it
17 closed a strong institution now and an
18 institution that we believe has a long future.
19 We have the strongest enrollment that we've had
20 in many years.

21 We believe that peer accreditation by
22 the Southern Association of Schools and Colleges

1 is an important aspect and something that we
2 value. So, with that, I'll say thank you so much
3 for allowing us to talk and have these few
4 minutes. Thanks again.

5 J. DERBY: Thank you.

6 M. FREEMAN: And last, Mr. Mark
7 Lindsay.

8 MARK LINDSAY: Hello. My name is Mark
9 Lindsay. I've had the privilege of serving as
10 the Assistant President for President Clinton and
11 serving in the Obama Administration and, very
12 significantly, working for Congressman Louis
13 Stokes, one of the founding members of the
14 Congressional Black Caucus. That experience has
15 informed me and educated me on the importance of
16 supporting educational opportunities for all
17 Americans.

18 I believe that Keiser University
19 represents one of those institutions that does
20 that and does it very well. You've heard today
21 some comments that attacked Keiser, its
22 practices, its leadership. But I want to

1 underline the fact that many of those allegations
2 are centered around allegations that were made,
3 frankly, against the Department of Education and
4 Keiser University and the IRS over 11 years ago.

5 Let me tell you a little bit about
6 what's really going on in Keiser University
7 today. I've had the opportunity to walk on the
8 campus and see the over 21 institutions that it
9 has, including international institutions. In
10 that time, Keiser University's commitment to
11 diverse education and a wide, diverse student
12 body and focus on providing positive outcomes for
13 its graduates is reflected in its ranking of 29th
14 best Hispanic-serving institution and first in
15 Florida and fifth in the nation for social
16 mobility, allowing individuals to improve their
17 life, improving outcomes for students.

18 Keiser University is dedicated to
19 increasing access to those educational
20 opportunities for people of color, serving 35
21 percent Hispanic students, 23 percent African
22 American, and 73 percent women. Those

1 significant student services, they have been able
2 to provide the kinds of additional supports for
3 students which allow them to achieve those kinds
4 of successes and achieve their dreams.

5 We believe that the predominantly
6 campus-based Keiser University has early-adopted
7 online education. And during the COVID epidemic,
8 when the nation needed nurses and healthcare
9 providers, they answered the call, producing
10 those people and serving Americans in need,
11 disproportionately representing people of color
12 in those areas.

13 This is the kind of commitment that we
14 believe that Keiser University represents, the
15 kind of commitment to service and the kind of
16 commitment --

17 G.A. SMITH: Thirty seconds left.

18 MARK LINDSAY: -- toward getting the
19 job done for people of color. I want to
20 congratulate Dr. Wheelan, Dr. Bounds, and Dr.
21 Harris for the work that they're doing on
22 addressing these issues. And we appreciate their

1 support and all the staff at the Department of
2 Education and this Committee for hearing this
3 testimony. We very much appreciate your work and
4 look forward to working with you in the future.
5 Thank you very much.

6 J. DERBY: Thank you.

7 Ronnie, I see your hand is up. I
8 wanted to give the Agency a chance to respond to
9 third-party comments, which is next. But do you
10 want to make a comment that -- I see your hand is
11 down. Okay.

12 Let's go back to SACS and give the
13 Agency a chance to respond to third-party
14 comments.

15 B. WHEELAN: Thank you, Madam Chair.

16 I want to say thank you to those
17 speakers who were in support of our efforts to
18 ensure quality at our institutions. President
19 Newkirk at Fisk -- I don't think I heard him say
20 they were the first HBCU to gain accreditation
21 with the Commission, and it was painful when they
22 got in trouble. So we were very pleased that we

1 were able to work with them and help them develop
2 the skills and tools that they needed to get back
3 on track.

4 Regarding Mr. Halperin's comments,
5 again, Keiser, I believe, is about to do their
6 fifth year review. And the financial issues and
7 personnel issues that you identified would be a
8 part of that review, so we'll go back and see if
9 there's anything there. I still say that we were
10 found in compliance with our process 11 years ago
11 when this came to be an issue. But we will do
12 our due diligence this time in reviewing them
13 again.

14 The shortcoming on our documents,
15 again, when you're putting in as much paper as
16 we're putting in and you have a new staff member
17 who's never done a compliance certification
18 before, there are going to be snafus. And that
19 happened to us. We got caught in it. We take
20 ownership of it. But I assure you that we will
21 have no problems submitting the correct documents
22 in the correct order with the appropriate

1 documentation as a follow-up to this meeting.

2 J. DERBY: Thank you. Now we give the
3 Department staff a chance to respond to the
4 Agency and third-party comments.

5 Dr. Harris or --

6 N. HARRIS: Yes. Thank you. I just
7 wanted to reiterate that I'm happy to work with
8 the Agency to continue to get the documentation
9 that is relevant to the petition and staff
10 determination sections, and also just remind the
11 Agency as well as everyone listening that we are
12 taking their concerns under advisement, and we're
13 moving forward with reviewing them in response to
14 the criteria requirements. Thank you.

15 J. DERBY: Thank you.

16 Any other staff with comments?

17 H. BOUNDS: I just have one comment.
18 I just wanted to reiterate something that we said
19 earlier. I think that SACS, again, will be able
20 to provide the documentation that we need on our
21 reviews of their site visits, their self-study
22 process. Again, we didn't see anything that

1 would indicate any significant issues with how
2 the Agency operates.

3 So we will work with them, and again,
4 I don't foresee any problems getting the rest of
5 the information and documentation that we need.

6 J. DERBY: All right. Thank you.

7 Then we've come to the point for the
8 discussion and vote of the Committee. And at
9 this point, I'd like to ask Wally or Mary Ellen
10 to put forward a motion so that discussion can
11 take place inside of that motion.

12 Wally?

13 W. BOSTON: All right. It's our
14 recommendation to concur with the Department's
15 recommendation. I know that the currently worded
16 recommendation -- there was a modification
17 suggested by Bob Shireman yesterday that aligns
18 nicely with the series of code sections and
19 criteria that match with monitoring reports and
20 compliance reports.

21 I don't have a specific wording for
22 that, but I'm certainly in concurrence that if we

1 can simplify the wording to match what he
2 suggested and Counsel suggested yesterday, Mary
3 Ellen and I are okay with that.

4 Do you have any comments, Mary Ellen?

5 M.E. PETRISKO: No. I think it's just
6 simplifying but not changing anything, just
7 bringing --

8 W. BOSTON: Right.

9 (Simultaneous speaking.)

10 M.E. PETRISKO: -- that Bob suggested,
11 but not changing any of the content.

12 J. DERBY: All right. Now, discussion
13 around the motion? You'll have to -- let's see.
14 I'm not seeing hands.

15 B. SHIREMAN: Just a second. Sorry.
16 Just checking.

17 J. DERBY: Okay. All right. It looks
18 like we have Ronnie.

19 R. BOOTH: Just very much in favor of
20 the motion. There is work to be done for sure,
21 and that's why we've given them a need for a
22 monitoring report, which we'll have, and we'll

1 find out in short order if everything's taken
2 care of. So very much in favor of the motion.

3 J. DERBY: And we have Bob?

4 B. SHIREMAN: Yeah. I might as well
5 insert my comments here. I will vote in favor of
6 the motion. My comment is to encourage the
7 senior Department official to include or add a
8 review of -- compliance review or a monitoring
9 report as appropriate regarding the complaint
10 procedures, 602.23(c).

11 And regarding two of the items that
12 are already having a compliance report, Agency
13 analysis of information, 602.17(e), and
14 monitoring, 609.19(b), that the issues there be
15 expanded to take into consideration the
16 discussion today regarding complaints, including
17 the Keiser/Everglades issues. Thank you.

18 J. DERBY: And Jennifer?

19 J. BLUM: I would support Bob on the
20 complaint provision, the complaint procedures. I
21 was going to actually make the same separate
22 suggestion.

1 And then I kind of ask a question of
2 Dr. Harris. I support the motion. I support the
3 motion, but one of the things that I think, and
4 we're just in a new world over it, is the amount
5 of issues that are going to be under a monitoring
6 report versus substantial compliance. And there
7 is overlap with regard to -- I think it was in
8 subchange. There's some subchange issues that
9 are subject to monitoring report, and I think
10 some subchanges that were subject to the
11 compliance report.

12 And I mean, honestly, that piece of
13 parsing -- because -- and the reason I'm bringing
14 this up is monitoring reports don't come back to
15 the Commission, but if I get this correctly, the
16 compliance report does come back to us --

17 (Simultaneous speaking.)

18 J. BLUM: And so I'm struggling -- I
19 mean, to be honest with you, I'm struggling with
20 that a little bit because it's hard for me to
21 parse in terms of how I look at things. And so
22 on, for example, subchange, I would just as soon

1 have anything relating to noncompliance or
2 substantial compliance with regard to subchange
3 all be in a compliance report so we can review it
4 all at once rather than in pieces.

5 But I'd love to hear, Nicole, your
6 thoughts on if you understand --

7 N. HARRIS: Sure.

8 J. BLUM: I don't know if I'm making
9 any sense, but --

10 N. HARRIS: Oh, no. I understand the
11 slight confusion with that. Some of the requests
12 for a compliance report were more policy -- it
13 was a policy or something that spoke directly to
14 the criteria that was either not provided or did
15 not meet the requirement of the criteria at that
16 time. That was considered a compliance report.

17 And based on the substantially
18 compliant definition, some things that fit the
19 definition in the new regulations could come
20 under a monitoring report as well as the file-
21 review documentation that is cited in the
22 substantially compliant sections because that

1 file-review information was not provided -- the
2 file review was separate from the petition. So
3 the information was asked in a monitoring report
4 for that reason, because it will be reviewed and
5 complete by file review.

6 So the substantive change issues, some
7 of them were policy-related or related to the
8 actual criteria to complete the petition
9 requirements. Either it was something referenced
10 in the narrative by the Agency that they didn't
11 provide, so they can provide it in the compliance
12 report that comes back to the Committee for
13 review, in reference to being on the record, or
14 it was documentation that I had part of it and
15 didn't have all of it.

16 So it was a judgment call. But I
17 think Herman can speak more to that.

18 H. BOUNDS: No, I think you explained
19 it well. So I'm going to take my hand down.

20 N. HARRIS: Oh. Okay. That was all.
21 Was that helpful? Was that helpful, Jennifer?

22 J. BLUM: Yes. Like I said, I think

1 we're in a little bit of a -- you know, this is
2 just a transition for everybody. So --

3 N. HARRIS: Yes. The new definition
4 -- here, I tried to apply it where it fit instead
5 of just everything being noncompliant.

6 J. BLUM: Yeah. No, and I understand
7 it. And that piece I'm very sympathetic to.
8 Anyway, it's like, gosh, I kind of would love to
9 be honest with you on things like the subchange.
10 I would love for the Commission -- I mean for the
11 Committee -- to have that topic back before us
12 entirely. But I'm not going to belabor that. I
13 defer to the SDO on that.

14 It's just we're in a new world, and it
15 makes it a little bit more complex. But I
16 appreciate this. That was helpful. And again, I
17 want to reiterate I don't know what the process
18 is, but I would support Bob and wanted to do
19 anything with regard to the complaint procedures
20 and a revisit of that interpretation and their
21 compliance there. I would support that if we go
22 there.

1 J. DERBY: Kathleen? You're muted.

2 K.S. ALIOTO: I would just like to
3 thank the Department and Nicole and Herman and
4 George and all the work that you've put in for
5 us, and to say to Dr. Wheelan I really had
6 thought I was going to vote no, but you and your
7 team present a caring and thoughtful picture of
8 what you're trying to do. And so I'm going to
9 vote yes like most of my colleagues, maybe all of
10 my colleagues. Thank you.

11 B. WHEELAN: Thank you, Ms. Alioto.

12 J. DERBY: Are there any further
13 comments? Seeing none, I would just like -- I
14 won't be voting, but I'd like to enter some
15 comments into the record. And first of all, as
16 somebody who works in the world of board
17 governance, I want to compliment you on raising
18 your governance standards and requiring board
19 self-assessment in the standards.

20 It's a time of public skepticism about
21 higher education, and governing boards of
22 trustees, regents, whoever they are, are feeling

1 the pressure of that. And I think that support
2 for their process is very important, and I wanted
3 to compliment you on that and at the same time,
4 in terms of, I thought, an excellent report
5 today, to applaud your considerable efforts to
6 support and encourage continuous improvement in
7 the area of student achievement. I'm impressed
8 by the good work you're doing on that.

9 B. WHEELAN: Thank you very much.

10 J. DERBY: I think it's been an
11 excellent discussion, and you certainly see the
12 areas that there are to work on. With that,
13 let's go to the vote.

14 Kathleen?

15 K.S. ALIOTO: Yes.

16 J. DERBY: Rosalind?

17 G.A. SMITH: She's been recused.

18 J. DERBY: Oh. Of course. Sorry.

19 Jennifer?

20 J. BLUM: Yes.

21 J. DERBY: Ronnie?

22 R. BOOTH: Yes.

1 J. DERBY: Wally?

2 W. BOSTON: Yes.

3 J. DERBY: David?

4 G.A. SMITH: Recused. Michael Lindsay
5 is absent. It's Molly.

6 J. DERBY: Molly?

7 M. HALL-MARTIN: Yes, with support of
8 previous comments related to revisiting the
9 complaint process.

10 J. DERBY: And Robert?

11 G.A. SMITH: Recused.

12 J. DERBY: Mary Ellen?

13 M.E. PETRISKO: Yes.

14 G.A. SMITH: He's recused.

15 J. DERBY: Of course.

16 And Bob?

17 B. SHIREMAN: Yes.

18 J. DERBY: And Zakiya?

19 Z. SMITH ELLIS: Yes, with a
20 suggestion that you consider electronic signature
21 like a DocuSign or something like that for the
22 complaint to make it easier for individuals.

1 J. DERBY: And Steve?

2 S. VAN AUDDLE: Yes.

3 J. DERBY: Well, so the motion
4 carries. And I want to thank everybody for being
5 here. Particularly, congratulations to the
6 Agency. But we needed nine of us, and nine of us
7 are here. So thank you for everybody persisting
8 and being part of it, and thanks for putting up
9 with a bumpy process with me presiding
10 temporarily. I'm sorry for the interruptions and
11 so forth.

12 But I think it's been a good day, and
13 the discussion was rich this morning. I think a
14 lot will come from it. And I just want to
15 commend NACIQI. I'm going to also add a comment
16 that I may not be staying on NACIQI. My term is
17 coming to an end, and I've been on for ten years.
18 And I just want to say that I think this is among
19 the best committees that I've served on, and I
20 mean NACIQI committees.

21 Over ten years, there's been a lot of
22 changes about composition. We have an excellent

1 Committee, and I'm so pleased that this
2 administration is encouraging our comments and
3 our advice because we have often complained over
4 ten years that we are a smart bunch of
5 experienced people in higher ed, and we don't get
6 a chance to do more than rubber-stamp our staff,
7 not that we've always done that.

8 But I see the encouraging trend with
9 the Subcommittees and the kind of comments that
10 are coming on, the policy, Bob's suggestion about
11 how to work motions so that they can have a
12 little bit more nuance to them. All that's very
13 good.

14 So, in case you don't see me, the
15 final comment I need to make is we need to meet
16 back in person because seven hours on Zoom is
17 punishing. All the research says nobody should
18 be subjected to that. And we do better in
19 person. So I just want to add my vote to that.
20 But I want to say we really have one of the best
21 NACIQIs I've ever been part of in terms of our
22 composition -- smart people stepping up, making

1 their comments, offering advice.

2 And I'm pleased that the Department is
3 so open to the advice that we're offering beyond
4 our recommendations around the Agency. So, with
5 that, thanks, everybody, for being here.

6 (Simultaneous speaking.)

7 G.A. SMITH: Motion to adjourn.

8 K.S. ALIOTO: You are a wonderful

9 (Simultaneous speaking.)

10 J. DERBY: Motion to adjourn -- I
11 second.

12 M.E. PETRISKO: Second.

13 J. DERBY: All those in favor of
14 adjourning?

15 (Chorus of aye.)

16 J. DERBY: That's unanimous. Let's
17 adjourn, and thanks, everybody.

18 (Whereupon, the above-entitled matter
19 went off the record at 4:00 p.m.)
20
21
22

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