

Report of the Meeting

National Advisory Committee on Institutional Quality and Integrity (NACIQI)

February 27 & 28, 2024



_____/s/_____
Claude Pressnell Jr., EdD, Chair

TABLE OF CONTENTS

EXECUTIVE SUMMARY.....4

SUMMARY OF AGENCY-RELATED ACTIONS.....6

ADMINISTRATION UPDATE.....10

ACCREDITOR DASHBOARDS SUBCOMMITTEE UPDATE.....11

NACIQI POLICY DISCUSSION.....11

DISCLAIMER

This report summarizes the deliberations of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) at its hybrid February 27 & 28, 2024 meeting. The NACIQI is an advisory committee established by the Higher Education Opportunity Act of 2008 and is subject to the Federal Advisory Committee Act. This report represents the views of the NACIQI. The report has not been reviewed for approval by the Department of Education (ED), and therefore, the report's recommendations do not purport to represent the views of the Department.

EXECUTIVE SUMMARY

NACIQI was most recently authorized by Section 106 of the Higher Education Opportunity Act of 2008. NACIQI's primary functions include advising the Secretary of Education on the establishment and enforcement of criteria for recognition of accrediting agencies under Subpart 2 of Part H, Title IV, of the Higher Education Act of 1965, as amended (HEA), as well as the recognition of specific accrediting agencies or associations or a specific State approval agency. The NACIQI also advises the Secretary on the eligibility and certification process for institutions of higher education under Title IV, of the HEA, including the relationship between accreditation of institutions of higher education and the certification and eligibility of such institutions, and state licensing responsibilities with respect to such institutions.

NACIQI met February 27 & 28, 2024 using a hybrid model—in which most committee members and some Department staff met in-person while agency representatives, third party commenters, other Department staff, and eight committee members participated virtually—to carry out its responsibilities to advise the senior Department official (SDO) with respect to the recognition of accrediting agencies.

NACIQI reviewed the following types of applications from accrediting agencies at its February 27 & 28, 2024 meeting:

- Five renewals of recognition;
- One request for an expansion of scope; and
- Three compliance reports.

NACIQI reviews all information submitted by an agency in support of its petition, the staff analysis and report, and third-party comments.

Assistant Secretary for Postsecondary Education, Dr. Nasser Paydar, addressed the NACIQI and other meeting participants. In his remarks, Assistant Secretary Paydar covered improvements to the Free Application for Federal Student Aid (FAFSA) and the status of two negotiated rulemakings: (1) Program Integrity and Institutional Quality and (2) Student Loan Debt Relief.

Wallace E. Boston, Chairperson of the Accreditor Dashboards Subcommittee, provided an update on the work of the subcommittee that included recommendations for both the Department and NACIQI: <https://sites.ed.gov/naciqi/archive-of-meetings/>). The NACIQI did not conduct a vote on the recommendations.

The following topics were covered during the policy discussion portion of the meeting: (1) the Secretary's process for initial recognition of an accrediting agency; (2) a brief update on the Program Integrity and Institutional Quality negotiated rulemaking; (3) a committee member's presentation on academic freedom; (4) a brief exchange about the exclusion of certain programs from the scope of agencies' accreditation; and (5) an acknowledgement about agencies having compliant practices without written policies, then composing and implementing such policies in response to staff concerns in draft staff analyses to become compliant prior to the release of final staff analyses.

NACIQI members in attendance for all or part of the meeting included Claude Pressnell, Jr. (Chair), Zakiya Smith Ellis (Vice-Chair), Kathleen Sullivan Alioto, Roslyn Clark Artis, Jennifer Blum, Wallace E. Boston, Debbie Cochrane, Keith Curry, José Luis Cruz Rivera, David A. Eubanks, Arthur Keiser, Michael Lindsay, Molly Hall-Martin, Robert Mayes, Mary Ellen Petrisko, Michael Poliakoff, and Robert Shireman.

U.S. Department of Education representatives who participated in the meeting included: Assistant Secretary for Postsecondary Education Nasser Paydar; NACIQI Executive Director and Designated Federal Official George Alan Smith; Management and Program Analyst, Monica Freeman; Accreditation Director Herman Bounds; Office of the General Counsel staff members Angela Sierra, Donna Mangold, and Christle Sheppard Southall; and accreditation staff members Laco (LG) Corder, Elizabeth Daggett, Paul Florek, Nicole S. Harris, Charity Helton, Reha Mallory, Stephanie McKissic, Karmon Simms-Coates, Michael Stein, Adrianne Walker, and Monica Yassa.

SUMMARY OF AGENCY-RELATED ACTIONS

The following agencies were acted on—in the order they are listed—using NACIQI’s standard review procedures:

Compliance Report | Accrediting Agency

Accrediting Commission for Acupuncture and Herbal Medicine (ACAHM)

Action for Consideration:

- Compliance Report

Recommendation:

- **NACIQI recommends** that the Senior Department Official accept all the recommendations of the Final Staff Report for the Accrediting Commission for Acupuncture and Herbal Medicine.
- Final Staff Report Recommendation: Renew the agency's recognition for 2 years and 5 months.
- Vote: 16 “Yes”; 0 “No”; 0 “Abstention”; 0 “Recusal”; 0 “Absent”

NACIQI Primary Readers:

- Roslyn Clark Artis
- Michael Lindsay

Representatives of the Agency:

- Mark S. McKenzie, Executive Director
- Karl Gauby, Director of Regulatory Affairs

Transnational Association of Christian Colleges and Schools, Accreditation Commission (TRACS)

Action for Consideration:

- Compliance Report

Recommendation:

- **NACIQI recommends** that the Senior Department Official accept all the recommendations of the Final Staff Report for the Transnational Association of Christian Colleges and Schools, Accreditation Commission.
- Final Staff Report Recommendation: Renew the agency's recognition for 2 years and 5 months.
- Vote: 12 “Yes”; 2 “No”; 0 “Abstention”; 0 “Recusal”; 2 “Absent”

NACIQI Primary Readers:

- Mary Ellen Petrisko
- Molly Hall-Martin

Representatives of the Agency:

- Dr. Benson Karanja, Chair of TRACS Accreditation Commission
- Dr. Timothy Eaton, President

- Dr. Ron Cannon, Vice President of Operations
- Dr. Tammy Pramanik, Vice President of Institutional Compliance
- Mr. Barry Griffith, Chief Financial Officer

Council on Occupational Education (COE)

Action for Consideration:

- Compliance Report

Recommendation:

- **NACIQI recommends** that the Senior Department Official accept all the recommendations of the Final Staff Report for the Council on Occupational Education.
- Final Staff Report Recommendation: Renew the agency's recognition for 2 years and 5 months.
- Vote: 12 "Yes"; 2 "No"; 0 "Abstention"; 0 "Recusal"; 2 "Absent"

NACIQI Primary Readers:

- David Eubanks
- Debbie Cochrane

Representatives of the Agency:

- Jeff Sisk, Immediate Past Chair
- Comelia Dunbar Jackson, Executive Committee Member
- Melinda Isaacs, Vice Chair
- Julie Ha, Executive Committee Member
- Kim Ziebarth, Chairperson
- Josh Cotter, Executive Committee Member
- Susan Wright, Chief of Staff
- Warren Haynes, Associate Executive Director for Operations
- Kallan Williams, Associate Executive Director for Compliance
- Kirk Nooks, President and CEO

Expansion of Scope | Accrediting Agency

National Nurse Practitioner Residency and Fellowship Training Consortium (NNPRFTC)

Action for Consideration:

- Expansion of Scope

Recommendation:

- **NACIQI recommends** that the Senior Department Official accept all the recommendations of the Final Staff Report for the National Nurse Practitioner Residency and Fellowship Training Consortium.
- Final Staff Report Recommendation: Department staff recommends approval of the agency's requested expansion of scope.
- Vote: 15 "Yes"; 0 "No"; 0 "Abstention"; 0 "Recusal"; 1 "Absent"

NACIQI Primary Readers:

- Zakiya Smith Ellis
- Arthur Keiser

Representatives of the Agency:

- Kerry Bamrick, MBA, Executive Director, Consortium for Advanced Practice Providers
- Shay Felder, MBA, Program Specialist, Consortium for Advanced Practice Providers
- Margaret Flinter, PhD, APRN, FNP-c, FAAN, FAANP, Chairperson of the Board of Directors, Consortium for Advanced Practice Providers
- DoQuyen Huynh, DNP, FNP, ARNP, FAAN, Accreditation Commission Vice Chair, Consortium for Advanced Practice Providers

Renewal of Recognition | Accrediting Agency

Kansas State Board of Nursing (KSBN)

Action for Consideration:

- Renewal of Recognition

Recommendation from Second Motion:

- **NACIQI recommends** that the Senior Department Official accept all the recommendations of the Final Staff Report for the Kansas State Board of Nursing and approve a language change to the agency's scope of recognition to include only pre-licensure nursing programs and advanced nursing programs.
- Final Staff Report Recommendations: Continue the agency's recognition as a nationally recognized state agency at this time and require the state agency to come into compliance within 12 months with the criteria listed in the final staff report, and submit a compliance report due 30 days thereafter that demonstrates the agency's compliance. Department staff also recommends approval of the language change to the agency's scope of recognition to reflect its past and current approval practice.
- Vote: 16 "Yes"; 0 "No"; 0 "Abstention"; 0 "Recusal"; 0 "Absent"

NACIQI Primary Readers:

- Wallace Boston
- Kathleen Alioto

Representatives of the Agency:

- Carol Moreland, MSN, RN, Executive Administrator

Missouri State Board of Nursing (MOSBN)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- **NACIQI recommends** that the Senior Department Official accept all the recommendations of the Final Staff Report for the Missouri State Board of Nursing.
- Final Staff Report Recommendation: Renew the state agency's recognition for four years.
- Vote: 15 "Yes"; 0 "No"; 0 "Abstention"; 0 "Recusal"; 1 "Absent"

NACIQI Primary Readers:

- Jose Luis Cruz Rivera
- Michael Poliakoff

Representatives of the Agency:

- Ammy Ackerson, Director of Education
- Lori Scheidt, Executive Director

Oklahoma Department of Career and Technology Education (ODCTE)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- **NACIQI recommends** that the Senior Department Official accept all the recommendations of the Final Staff Report for Oklahoma Department of Career and Technology Education.
- Final Staff Report Recommendation: Renew the state agency's recognition for four years.
- Vote: 15 "Yes"; 0 "No"; 0 "Abstention"; 0 "Recusal"; 1 "Absent"

NACIQI Primary Readers:

- Robert Mayes
- Keith Curry

Representatives of the Agency:

- Brent Haken, State Director
- Justin Lockwood, Chief of Staff
- Jessica Ventris, Director of Academic Affairs

Pennsylvania State Board for Career and Technical Education (PABCTE)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- **NACIQI recommends** that the Senior Department Official grant Pennsylvania State Board for Career and Technical Education renewed recognition for four years and require a monitoring report within 12 months to be reviewed by Department staff to ensure that corrective action is taken, and full compliance with 603.24(a)(3)(ii)(A) is achieved or maintained, or for action by staff under section 602.33 if it is not.

- Final Staff Report Recommendation: Renew the state agency's recognition for four years.
- Vote: 15 “Yes”; 1 “No”; 0 “Abstention”; 0 “Recusal”; 0 “Absent”

NACIQI Primary Readers:

- Jennifer Blum
- Zakiya Smith Ellis

Representatives of the Agency:

- Judd R. Pittman, Director, Bureau of Career and Technical Education
- Beth Marshall, Career and Technical Education Advisor II/SAC, Bureau of Career and Technical Education
- Tamalee Brassington, Division Manager, Bureau of Career and Technical Education

New York State Board of Regents (Public Postsecondary Vocational Ed, Practical Nursing) (NYBRVE)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- **NACIQI recommends** that the Senior Department Official accept all the recommendations of the Final Staff Report for the New York State Board of Regents (Public Postsecondary Vocational Ed, Practical Nursing).
- Final Staff Report Recommendations: The state agency is in substantial compliance with the criteria listed in the final staff report. Renew the state agency's recognition for four years. Department staff recommends the state agency submit a monitoring report, due in 12 months, demonstrating that it has amended its policy to include all of the entities required by 603.24(b)(1)(i) on its advisory committee, codifying in policy its compliant practice.
- Vote: 14 “Yes”; 0 “No”; 0 “Abstention”; 0 “Recusal”; 2 “Absent”

NACIQI Primary Readers:

- Arthur Keiser
- Robert Shireman

Representatives of the Agency:

- Casey Schenk, Associate in Nursing Education

ADMINISTRATION UPDATE

Assistant Secretary for Postsecondary Education, Dr. Nasser Paydar, addressed the NACIQI and other meeting participants. In his remarks, Assistant Secretary Paydar covered improvements to the Free Application for Federal Student Aid (FAFSA) *and* the status of two negotiated rulemakings.

- Assistant Secretary Paydar emphasized the Administration’s interest in increasing the number of people who qualify for Federal Pell Grants, including its maximum. He announced that there have been significant improvements to the FAFSA, including a new formula, new technology, and a

new process that is connected to the Internal Revenue Service, which has reduced the completion time of the FAFSA to 10-15 minutes. Paydar explained that ED is preparing Institutional Student Information Records (ISIRs) to distribute in March, so that institutions can begin preparing students' financial aid packages. He also mentioned that ED is allocating \$50M for technical assistance to support institutions, deploying teams of federal staff to help institutions with the FAFSA changes, and increasing the number of staff in call centers. The Administration projects that over 600M people will qualify for Pell and that 1.5M people will qualify for maximum Pell.

- Assistant Secretary Paydar shared that the Program Integrity and Institutional Quality negotiated rulemaking sessions were held in January and February and included the review of state authorization, distance education, and accreditation. He announced that the fourth and final negotiated rulemaking session on Student Loan Debt Relief for student loan borrowers facing hardships has been completed. He also highlighted the Saving on a Valuable Education Plan (SAVE), an income-driven repayment plan that over 7M people are now subscribed to.

ACCREDITOR DASHBOARDS SUBCOMMITTEE UPDATE

Wallace E. Boston, Chairperson of the Accreditor Dashboards Subcommittee, provided an update on the work of the subcommittee, including the following recommendations. The NACIQI did not conduct a vote on the recommendations. (See report for more details: <https://sites.ed.gov/naciqi/archive-of-meetings/>):

- NACIQI should consider including guidelines in the Federal Register Notice for agencies to use the dashboard.
- The Department should explore whether some of the gaps in success measures can be filled in, most importantly the retention and graduation rates for non-first-time, full-time students.
- The Department should work with its outside vendor to build the dashboards for specialty accreditors that the subcommittee has requested.
- It may be useful for NACIQI to provide advice on H.R.2957, the [College Transparency Act](#), since it overlaps with these recommendations.
- NACIQI should continue to meet with accrediting agencies outside of its meetings to further develop the usefulness of the dashboards by (1) seeking agreement on uses of the current dashboard, (2) prioritizing improvements to the dashboard, and (3) developing the idea of integrating institutional data to assess student risks as context for rewards.

NACIQI POLICY DISCUSSION

The following topics were covered during the policy discussion portion of the meeting: (1) the Secretary's process for initial recognition of an accrediting agency; (2) a brief update on the Program Integrity and Institutional Quality negotiated rulemaking; (3) a committee member's presentation on academic freedom; (4) a brief exchange about the exclusion of certain programs from the scope of agencies' accreditation; and (5) an acknowledgement about agencies having compliant practices without written policies, then composing and implementing such policies in response to staff concerns in draft staff analyses to become compliant prior to the release of final staff analyses.