UNITED STATES DEPARTMENT OF EDUCATION

NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY

MEETING

FRIDAY
JUNE 10, 2011

The Advisory Committee met in the Commonwealth Ballroom in the Alexandria Holiday Inn, 625 First Street, Alexandria, Virginia, at 8:30 a.m., Cameron Staples, Chair, presiding.

PRESENT:

CAMERON C. STAPLES, Committee Chair, Partner, Neubert, Pepe, & Monteith law firm
ARTHUR J. ROTHKOPF, Committee Vice-Chair, President Emeritus, Lafayette College
ARTHUR E. KEISER, Chancellor, Keiser Collegiate System
EARL LEWIS, Provost and Executive Vice President for Academic Affairs, Emory University
WILFRED M. McCLAY, SunTrust Bank Chair of Excellence in Humanities, University of Tennessee at Chattanooga
ANNE D. NEAL, President, American Council of Trustees and Alumni
WILLIAM PEPICELLO, Provost and President, University of Phoenix
SUSAN D. PHILLIPS, Provost and Vice-President for Academic Affairs, State University of New York at Albany
BETER-ARON SHIMELES, Student Member, Fellow, Peer Health Exchange
JAMIENNE S. STUDLEY, President and CEO, Public Advocates, Inc.
LARRY N. VANDERHOEF, Former Chancellor, University of California, Davis
FRANK H. MEMBER WU, Chancellor and Dean, University of California, Hastings College of Law
FREDERICO ZARAGOZA, Vice-Chancellor of Economic and Workforce Development, Alamo Colleges

STAFF PRESENT:

MARTHA J. KANTER, Under Secretary
MELISSA LEWIS
SALLY WANNER
KAY GILCHER
CAROL GRIFFITHS
ELIZABETH DAGGETT
KAREN DUKE
JENNIFER HONG-SILWANY
JOYCE JONES
CHUCK MULA
STEVE PORCELLI
CATHY SHEFFIELD
RACHAEL SHULTZ
T-A-B-L-E  O-F  C-O-N-T-E-N-T-S

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Welcome and Introductions

CHAIR STAPLES: I'd like to call the meeting of NACIQI to order, and welcome everyone who is here on the committee and in the audience.

As you're aware, this is our third day of deliberations and we're well into our policy discussions, and we look forward to having more discussions and hearing from panelists and setting a better direction, in terms of our policy recommendations.

Just before we start the official part of the meeting, I'd like to have us go around the table, since I know the audience may be different each day, and it's useful to have our introductions. My name's Cam Staples. I'm the chair of NACIQI. Arthur?

MEMBER ROTHKOPF: Arthur Rothkopf, Vice Chair.

MS. PHILLIPS: Susan Phillips,
Chair of the Policy Subcommittee, Provost and Vice President for Academic Affairs at the State University of New York in Albany.

MEMBER NEAL: Still Anne Neal, president of the American Council of Trustees and Alumni.

MEMBER SHIMELES: Aron Shimeles, BRA Fellow, Peer Health Exchange.

MEMBER WU: Frank Wu, Chancellor and Dean, University of California at Hastings College of Law.

MEMBER KEISER: Arthur Keiser, Chancellor of Keiser University.

MEMBER LEWIS: Earl Lewis, Provost, Emory University.

MEMBER ZARAGOZA: Federico Zaragoza, Vice Chancellor, Economic and Workforce Development, Alamo Colleges.

MEMBER McClAY: Wilfred McClay, University of Tennessee.

MEMBER VANDERHOEF: Larry Vanderhoef, University of California-Davis.
MEMBER PEPICELLO: Bill Pepicello, President, University of Phoenix.

MEMBER STUDLEY: Jamienne Studley, Public Advocate, San Francisco.

MS. GILCHER: Kay Gilcher, Director of Accreditation Division, U.S. Department of Education.

MS. LEWIS: Melissa Lewis, NACIQI Executive Director, U.S. Department of Education.

CHAIR STAPLES: Thank you, and I think we may have, as the day wears on, I know some members have other commitments in terms of departing for the day.
Election of New NACIQI Chair

So we're going to move, we're going to shift our agenda a little, and move to the election of a new NACIQI chair, before we start the panel discussions, to make sure we have a quorum in sufficient numbers here.

Before we start that, I just want to mention that I really have enjoyed serving as chair. As I've mentioned to the members, I'll be taking on a new position in July, and I think this is a good move for me to step down as chair.

I look forward to remaining as a member, and it reminds me of stories about boat owners, those of you who are boat owners. The two happiest days in a boat owner's life is the day you buy a boat and the day you sell a boat. I was very happy to be elected chair, and I'm finding I'm somewhat happy to be stepping down as chair.

But I'm looking forward to continuing to serve with you, and at this
time, I open the floor to nominations. Arthur?

MEMBER ROTHKOPF:  Yes.  First, before I make a nomination, I'd like to express my own view, and I think those of, I'm sure, other NACIQI members, to thank Cam for his leadership in getting this group going. It's a disparate group of people with a lot of opinions, and always to keep us on track.

But Cam, thank you very much for your leadership over these last several months.

(Appause.)

CHAIR STAPLES: Thank you.

MEMBER ROTHKOPF: I'd like to nominate, and Cam, I gather, is remaining -- you're remaining as chair until June 30?

CHAIR STAPLES: Until June 30th, that's right.

MEMBER ROTHKOPF: I'd like to nominate as chair of NACIQI our colleague Jamie Studley, and ask that she be elected
effective July 1 of 2011, and serve until the end of her term, which is some time in September of 2013. So I move that.

CHAIR STAPLES: There is a motion on the floor. Is there a second?

MS. PHILLIPS: Second.

CHAIR STAPLES: Move and seconded.

Are there any other nominations?

(No response.)

CHAIR STAPLES: Seeing no nominations, all in favor of electing Jamie Studley as the next NACIQI chair, please raise your hand?

(Show of hands.)

CHAIR STAPLES: Any opposed?

(No response.)

CHAIR STAPLES: Congratulations.

MEMBER ROTHKOPF: Other than Jamie.

CHAIR STAPLES: We won't count the opposing or abstentions. The motion passes and Jamie will assume the chairmanship on July
1st. Congratulations.

MEMBER STUDLEY: Thank you very much. It always looks great to have a vote from the outside, so I too am honored. I thank Arthur for the nomination and all of you for your confidence, and I look forward to working with you on these important issues.
Terms of Chair and Vice Chair

CHAIR STAPLES: Without trying to take too much time on this, I do want to mention that it may make sense for us as a Committee to adopt a rule around the terms of our leaders. As you may recall, when we elected the officers last fall, we didn't specify for how long.

Arthur and I wondered how long our terms were. Arthur's motion sets Jamie's term at effectively a three-year term, if you go back to our swearing in in September, three years from last September, and that would be the length of her term of service.

So I guess it would make sense, in my opinion, and I would invite any motion to this effect, that we set the term of the chair and the vice chair for a three-year period, and that would allow for a rotation of leadership on a cycle that is predictable. Art?

MEMBER ROTHKOPF: I have a
question about that, because you know, for
Jamie it's not an issue. But for future, we
have this strange appointment times.

CHAIR STAPLES: Well, we checked
that out, Art.

MEMBER ROTHKOPF: I'm not sure --
it's not going to flow, because we may have to
put somebody who's never done any chair, you
know, been a chair and just right at the
beginning of their term become the chair,
which may not be the best thing.

CHAIR STAPLES: Well, let me
answer your question, because we looked into
that. We weren't sure what the length of the
reappointment terms were, at least we couldn't
recall it by memory, and they are six years.

So we have members with three year
terms, four year terms and six year terms
presently, and then the replacements or
reappointments will be for six years. So I
mean it's your pleasure, but a three-year term
for chair and vice chair might coincide.
First of all, it will be the end of the first group's term, and thereafter, people will be appointed for six years. So it would be roughly half of the term of membership. If that's appealing to all of you, then I would ask for a motion to set a three-year term, starting from the date of our assumption of office last September.

MEMBER ROTHKOPF: So moved.

CHAIR STAPLES: Is there a second?

MEMBER PEPICELLO: Second.

CHAIR STAPLES: Any further discussion?

(No response.)

CHAIR STAPLES: All in favor say aye or raise your hands. Sorry, that's what we do here. Raise your hands.

(Show of hands.)

CHAIR STAPLES: Any opposed?

(No response.)

CHAIR STAPLES: Okay. So that would set both Jamie and Arthur's term to
expire in September of 2013, at which time the Committee would elect or reelect their officers. Unless there's anything further on this, we'll move to our regular agenda, and oh yes, Melissa.

MS. LEWIS: For those in the audience, thank you very much for coming, and also thank you to our invited guest as well. We appreciate your joining us today. I did want to cover the procedures for making oral comments for the public today.

There are applications out on the registration table out front. Please complete them. They'll be time-stamped and you'll receive a laminated number and go in that order. Up to ten people may comment concerning either one of the two issues we'll be reviewing today.

The TRIAD will be covered this morning, and Accréditor Alignment, Scope and Accountability will be covered this afternoon. Each commenter will receive three minutes to
speak, up to three minutes to speak.

Also, there are no recusals today. 

There are 13 members present. We are missing Bruce Cole, Dan Klaich, Carolyn Williams and Britt Kirwan, and that's all I have. Thank you.

CHAIR STAPLES: Thank you. Any other announcements? Seeing none, we'll proceed to the next forum. Sue, did you want to make any comments before we start?

MS. PHILLIPS: Just a quick note. Again, this is a large banquet that we're consuming over the course of a day and a half. You'll find in the seat in front of you, the table in front of you a quick summary of our discussion yesterday, entitled "Issue 1."

Today, we take up two additional issues. Again, bearing in mind that we know that these aren't separate, and I'm sure that there will be other topics that emerge. I'll keep a running tab of issues that we might want to add toward consideration for later,
and welcome the opportunity to hear from our guests and to speak among ourselves. Thanks.
CHAIR STAPLES: Okay. Why don't we proceed to the guests, who have been sitting patiently at the table for the last 15 minutes. Peter Ewell and Marshall Hill, please begin in whatever order you choose.

MR. EWELL: I think I'll start. Thanks for having me back. That either means I did a good job or I wasn't clear last time.

CHAIR STAPLES: Both.

MR. EWELL: So you'll see. I'm supposed to kick off the discussion of the Triad. I'll make a couple of initial remarks, and then do two parts of this.

The initial piece is for you to again be reminded about how kind of almost unique this arrangement is, that I do a lot of international work in quality assurance and nobody does business the way we do. Now that may be a good thing, that may be less of a good thing. But in any case, it's fairly unusual to have it this way.
Also, as you have heard before, from me and from others, if one was to start from scratch and build a quality assurance system, this is not the one we would build. It's something that has evolved over time, and you know, has had some historical antecedents to it and so on.

But actually, while I'm going to be quite critical of the current state of affairs, it's important to say at the outset that the Triad has done a pretty good job, that it's been fairly robust; it's survived a lot of sturm and drang. It's managed to, I think, get the job done in our typically American inefficient way, and so on.

I'm reminded in thinking about this, it's variously attributed to Churchill and to Gandhi, the remark that democracy is the worse form of government except for all the rest. So when I said at my summing up at the last NACIQI meeting that you asked me to do, "do no harm," I think that you do need to think about
that, that the Triad has really worked well in some respects.

Now I'm going to be very critical for the rest of what I'm going to say. I want to do two things. One is to take you essentially on at least my tour of who these players are and what their interests are, because the members of the Triad are really quite different.

They have different motivations, they have different views of quality. They have different strengths and constraints that they bring to the table and so on, and that all has to borne in mind.

Then the more fun part is essentially what various people who advocate you do about it, what are some of the fixes that might be out there.

So let me start by reviewing the basic players, and I'm going to add on, so it's really a quadrad or a quartet or something like that. But the first one is, of
course, the federal government. Remember that the federal government's role in quality assurance is intentionally limited.

There is no reference to education in the federal constitution, and the role is actually historically a fairly recent one. It's one that began with large infusions of federal dollars, beginning with the second G.I. bill, but largely with the Higher Education Act of 1965. And because the role is indirect, having to do with essentially the stewardship of funds, and the way those funds are spent, quality is looked at really from a federal perspective, in a quite distinct and narrow way.

I mean there's first of all the question of stewardship. A high quality institution is one that essentially is an institution that can be trusted with your money, one that has good checks and balances, that is well accounted for and all of that.

Going beyond that, a quality
institution is one that provides a degree with some value in the marketplace, sufficiently so that a student could pay back their loans. That's another way of looking at it, and that's where the whole debate about gainful employment comes in and so on. That is a legitimate place for the federal government to be asking questions.

One final role that is not talked about as much, but I think is tremendously important, is the federal government as a source of information.

The graduation rate statistics, flawed though they may be, are put out by IPEDS, through the graduation rate survey. The standards for data collection, all of those kinds of things are a tremendously important piece of the federal piece of the federal role.

Now talking about sort of issues and complaints, the main problem with direct federal role, and you can fix that if you
could persuade Congress to go along with you, is that there are really no funds to do a direct inspectorate role. If you were to take over essentially the entire quality assurance kind of thing, it would cost a lot of money.

One of the things that the federal government gets through the Triad is essentially a process that's fairly cheap. It's not cheap for the institutions, but it's cheap for the federal government. So that's an issue.

Let me turn to the states. At least three roles, I think, the state governments play in quality assurance through the Triad. There's the special role that they play as the owner-operators of a set of public institutions. They are directly responsible for budgets there, and they have a direct oversight role in that respect.

That means that the kind of question that a state asks about a public institution has a fair amount not just to do with the
quality of educational output, but with efficiency. Are we getting bang for the buck? Are we essentially getting our return on state investment?

A second role is the role that the state plays in its public agenda role, as the keeper of the state's work force, of the polity and so on. It wants degrees from any source, whether it be private or public, that have value in the marketplace, that contribute to workforce needs and all of those kinds of things.

Finally, the state has a strong role in consumer protection, and that's where the quality assurance role comes in most directly through state licensure, licensure to operate. That's where most of the problem is at the moment, and Marshall may address this.

We haven't coordinated our remarks well, but my organization, the National Center for Higher Education Management Systems, completed a survey for CHEA not too long ago,
and we're following that up with an oversight, a survey of state oversight practices with regard to licensure to operate.

It is all over the map. It is an incredibly complicated, varied, difficult to understand kind of picture, with more than one agency responsible in many states. Oklahoma has three for licensure. Sometimes it's the SHEEO agency; sometimes it isn't and so on. So I leave that as a problem that needs to be addressed.

Now the accreditors. Accreditation is, of course, an age-old institution. It goes back to at least the 1880's or so in the oldest of the regionals. It was put together basically by the Academy for the Academy, for institutions to take a look at one another, and recognize one another as being part of the club.

I could go into a long history, which I won't, as to some of those early kinds of things. But suffice it to say that the
view of quality, that's deep down in the heart of accreditation, is an academic view of quality, one that has to do with a lot of things that the public isn't necessarily interested in, things that have to do with academic freedom, things that may have to do with participatory governance, things of that sort which are near and dear to our hearts, but not necessarily to the public.

It also means that the regional accreditors, with whom you are chiefly concerned, were never designed to do the job that the federal government is asking them to do. There's a fundamental disconnect there, in terms of the capacity of voluntary accrediting organizations to serve essentially as a federal inspectorate, and that's been a tension that's been recognized, I think, from the very beginning.

There are some severe defects as a result. The regional structure or regional accreditation is not well-understood by the
public. Arizona is a North Central State. I mean I'll leave you with that. The biggest of them has got 19 states. The smallest has two and some territories. I mean the thing, again, evolved rather than was actually consciously designed.

It's very under-capitalized, and so we have inconsistent training of reviewers. We have very different ways of doing peer review, so that sometimes institutions get one kind of a review; sometimes they get a very different one, depending on who the chair is, and all of these are things that have been offered before.

The standards are idiosyncratic and not aligned across regions. Each region has its own standards. They all say more or less the same things, but the language is different and again, the public finds that hard to understand. There's a weak information reporting thing, where basically the results or reviews, it's difficult to get them out to
the public in again, an easily-understandable way.

That's in contrast to most other countries, where quality reviews are on the web, and you can call them up, as a consumer. You can't understand them, but you can at least get access to them.

And the approach to learning outcomes. Accreditation is very process-oriented, and so the assessment process is what's required, where what I think what people are looking for is what are people learning and what's the outcome. You may have an excellent assessment process, but you may be brain dead as an institution. So you know, there's that kind of an issue that I think is a difficulty.

I'll mention very briefly, before we go into a couple of action steps, another set of players, which if -- the Triad really came into its own with the Higher Education Act of 1965. These players didn't exist. I'm
talking the media, I'm talking third party organizations, *U.S. News*, an arbiter of quality, whatever you may think of them.

The policy shops like my own or Pat Callan's or Kevin Carey's, that are in many sense arbiters of quality in the public arena. So I think that that's a new wrinkle that's not been brought into the regulatory environment. Now the distributed set of actors that the Triad represents, is not, as I say, it's unusual in the world. It's got some advantages and disadvantages.

Certainly an advantage is checks and balances, that because they come from very different places, these actors can look at each other and sort of backstop one another, and I think that's important. The division of labor is at least theoretically a right one, where the accreditors can look at quality and the feds can look at standards of probity, things like that. The states can look at consumer protection.
Theoretically, it's great. The problem has been in the past, that everybody's tried to do everything, and I think that clarity of the division of labor is something that could use some looking at. And, as I said, it's cheap, at least to the federal government. That's an advantage.

Disadvantages, a lot of process duplication, as I mentioned, people doing the same stuff. The most strict state regulators are essentially doing something that looks very like accreditation. It involves visits, it involves periodic looks; it has standards, it has peer review, it has all those kinds of things associated with it.

Lack of coordination and miscommunication can be a problem, and I think the whole system lacks one very important element to it, and that's communication of quality to the public. None of them do that very well, and I think that that's an issue.

Let me turn now to a couple of
things that could be done, and I'll look at
some potential actions by each member of the
Triad, some of which could be affected by
reauthorization, but all of which, I think,
should be on the table for your consideration.

For the federal government, I think
that the information function of the federal
government in quality assurance is already
strong, but could be strengthened.

We need more statistics on
longitudinal student flow, graduation rates,
movement, particularly from one institution to
another, because right now, and this is a
problem for accreditation, you've got students
who are attending more than one institution,
sometimes as many as three institutions before
gaining a baccalaureate degree, and that's
very hard to keep track of.

FERPA is an issue here, because
building longitudinal databases requires
having regulations that allow agencies to
share information with one another. The big
thing that's going on right now is the states are building capacity of K-12 to postsecondary kinds of things. So that's one idea.

An idea that I haven't seen floated, and it may not even be legal, but I thought I'd put it on the table, is the idea of indemnifying accreditors. Accreditors are having to put up with the threat of suit, and therefore they're constrained in their actions, and may not be as free to take a sanction as they might otherwise be.

And I think that a final thing, and this is the one that will get me kicked out of the room, I think NACIQI could use some looking at. I think that NACIQI needs to focus what it's doing.

I think that what you're in the dilemma of right now is the same dilemma that the accreditors have got, that unless -- you have one big stick, and if you use that big stick, you will do incalculable damage.

So it's then death by a thousand
cuts. It's finding all these kinds of things that you can get a report on later on. It's a dilemma that you need to be able to solve, because I think the focus of what NACIQI needs to be doing, which is really, in my view, looking at the way in which accreditors look at learning, may get crowded out.

So that's the federal government. For the states, I think we've got to develop, and Marshall, you may have some more to say about this, and CHEA's already working on it, develop more rationalization in the licensure to operate kinds of things. As I say, the situation is now really a mess, in terms of being able to understand it.

Certainly, those of you, several of you who are on the committee have had to navigate this in multiple states. It's not an easy thing to do. So I think we need model legislation, we need reciprocal agreements, we need a number of things like that that can rationalize the way in which that operates.
For the accreditors, a lot of suggestions are on the table. They're not necessarily mine, and I'll remind some of you. Art, I know you were around at the time, but in the 1992-94 period, when we had the National Policy Board on Institutional Accreditation, which led to the CHEA ultimately, all of these proposals were on the table, and I think they're on the table again.

The first is to find another way of thinking about the regional structure, and I'm not necessarily an advocate of that. There are a lot of reasons why a regional structure is good. But the current one makes very little sense, at least as far as the public is concerned in understanding it.

A suggestion was made at the last NACIQI meeting, I think Kevin Carey did it, that we might at least be able to take out the publicly-traded for-profits, and use a different structure there. I think the same argument could be made for some distinctly
defined institutional sectors. Community colleges come to mind, but there are a number of things like that.

There are dangers in that too. I mean there's no perfect structure, and there are already moves afoot on the part of some of the major research universities, to say we'd like our own accrediting organization. So some of this is already happening.

I think focus more on data-driven review. A lot of the regionals are already doing that. Most of the specialized still do or already do. But basically focusing on things like graduation rates, focusing on things that have external benchmarks and so on, and having the review basically be data-driven rather than person-driven, which is the way it currently is with peer review.

Another idea that's been talked about before is multiple levels of recognition. Right now, accreditation is on/off, yes/no, and several proposals have
been floated to say can we have an accreditation with distinction or something like that. The National Policy Board back 15 years ago recommended three levels of recognition. We all wrote papers about it. It's an idea that has been roundly explored.

And again, for NACIQI, if you haven't gone back into those archives, they're very interesting. A lot of the work that you're doing now has already been done and, you know, you might well go back to some of those working papers.

The fourth suggestion is aligning standards across accreditors, especially for degree-level student learning outcomes. A meeting I'm going to later today is I was one of the drafters of the Lumina degree qualifications profile, and that may well be a vehicle for getting that done.

If regionals could all map the DQP, we would have at least some notion of what goes into a baccalaureate degree or an
associate degree or a masters degree. What do they all have in common in terms of learning?

Discipline the peer review process.

I mentioned that last time to you, to ensure more consistency across reviews. Data-driven is part of that, but a lot of it has to do with not turning our back on peer review, but saying can we have more professionally trained reviewers, if you will, people who are trained at doing this?

I ran into the TEAC folks before this. I think there is a model process for this. It's an audit process. It's a process in which the reviewers are highly trained, the review process is very well-scripted. They use audit trails. All of those kinds of things are there.

Publicly communicate the results of a review in some kind of standard form. The regionals are working on that now, but we need essentially a one-pager that looks at not the whole report, but what are the strengths of
this institution, whether we have challenges
for this institution and so on.

The final suggestion that's been out
there is increase the number of public members
on commissions. I wouldn't say a majority,
but I'd say more than the two or three that
are there now. That may take some changes in
statute or rules, but I think it's an idea
that's worth considering.

Those are the suggestions that have
been put forward not just by me, but by a lot
of people, that I offer for consideration. I
think in conclusion, though, that one thing
that you all might consider, is I think this
is going to take a lot more work than you can
muster in the next six months.

So I think we may need a commission
to look at this, with foundation support, and
I know that Lumina would be interested in
supporting it. I think Gates would too, and I
think this needs a serious long-term look
across the board. That's it.
CHAIR STAPLES: Thank you very much.

That was very thought-provoking. I'm sure we look forward to the question and answer portion. Marshall.

MR. HILL: Well, if Peter wasn't already widely recognized as a recognized authority, that would sure do it. Everyone that's done any kind of work in this area is well aware of Peter's contributions, and probably most of the people in the room and most of you are wondering why in the world your staff has invited someone from Nebraska to come and talk about these issues.

So perspective always matters. So before I get into the meat of my comments, I'll share mine. I was a faculty member for 18 years in multiple types of institutions, small, private, liberal arts college, urban university, two research, one land grant universities.

I've done 11 years of state-wide work at the Texas Higher Education
Coordinating Board, where I was assistant commissioner for universities in health-related institutions. During the time when all of this cross-border distance education, growth of the for-profit sector was going on, and one of the many things that were good about that work, is that almost every issue that was happening in the country was happening in Texas. So I've been around this track a number of times.

One of the things we did there during my tenure was to look at the way the Texas Board recognized, in the same way that the U.S. Department of ED does, accreditors, for essentially, to some degree, the same purposes, for authority to operate, for participation in state-wide financial aid and so forth. So we did that work.

We also approved new institutions seeking to operate out of state institutions coming into the state and so forth. For the last six years, I've been head of the Nebraska
Coordinating Commission for postsecondary education. We're a fairly traditional coordinating board doing the usual tasks of approving degree programs, buildings built with tax funds, new institutions.

We run financial aid programs, do all sorts of studies and reports for the state of Nebraska. Personally, I've done a good deal of work with accrediting bodies of all types, first as a faculty member, being on institutional teams, preparing for accreditation visits, both regional and specialized, and then over my statewide work, I've done a lot of direct work with them from that perspective.

Been an active participant in the regional compacts, SREB, the Investment in Higher Education Compact, trying to do this work, and also been very active in SHEEO. I note my two SHEEO colleagues are not here this morning. I don't know what that says about their views of anything I might say, but I'm
of their ilk.

    Maybe lastly is I represented SHEEO and state higher education agencies three times on the SHEEO rulemaking panels, in 2007 dealing with accreditation; in 2009 dealing with accreditation, and then most recently on the program integrity rules. So I'm a known quantity to many of the senior staff here.

    I'll offer a disclaimer, and say that what I'm going to say are my views. They are informed by lots of talks with colleagues across the world of higher education, but they are mine. They're not shared uniformly, even by my SHEEO colleagues. As Peter indicated, we are all different. We all do this work in extraordinarily different ways.

    Some of our views on these issues dealing with the Triad cluster a bit around the degree to which a SHEEO agency regulates. You know, some of us are regulators. We approve institutions to operate within our borders. We have several other gatekeeping
functions, and some of us are less so.

I've been a regulator. I've been on the regulating side of that equation for a long time. So you might keep that in mind.

My personal views on the Triad remarkably parallel Peter's. No one would design this approach. No one around the world, to my knowledge, I've done far less international work than Peter, but I have worked in three or four other countries.

Then they say we want to have a system sort of like the United States has for quality assurance. I've said really? Do you really want to do that? So we've had some discussions about that.

But I personally have been a strong supporter of the Triad approach to quality assurance and accountability, for half a dozen or so principle reasons. One, it's a more comprehensive approach than any of the three current partners could pursue alone. It acknowledges that we have some shared
concerns, that we have shared responsibilities
to offer, good higher education opportunities
to the people in the country that we serve.

It provides possibilities for us to
mutually reinforce one another. We're all
subject, especially those of us in states and
the federal government, to strong political
winds, and sometimes we need a little bit of
support in dealing with issues as they come
along.

My experience has been that it's
been very helpful to count on partners at the
U.S. Department of ED and at accrediting
bodies, when there was some particular issue
that I, as a state regulator, was having some
challenges in dealing with.

So I've relied on the federal
government to have policies and provide
funding, that provided a good, strong support
for financial aid. The data that the U.S.
Department of Education produces through IPEDS
and other means is invaluable, especially to
states like mine which are just starting really serious efforts towards state-wide longitudinal data, and we in states rely on that.

We also rely on accreditors to do some things that many times by statute we are precluded from doing. Now looking at quality issues, it is not uniform for all states. Some of us have a great deal of engagement with that, and some of us have much less.

Frankly because of pressures from the public higher education system in Nebraska, the agency I currently head has far less direct influence on quality issues than the Texas Higher Education Coordinating Board did.

So not everyone always wants a strong state entity to look at these issues. As a matter of fact, most people don't, including both good and less good institutions.

So those kinds of things, I think,
are very, very helpful. But maximizing the potential benefits of the Triad is difficult, and I think Peter has given some good, good suggestions about ways in which we could improve what we now have.

But changes that we've all experienced have really stressed each component of the Triad. All three, all three, have been stressed by the very rapid changes in technology and delivery methods in institutional missions, in structure, in focus and control. All of those simple words have, in one way or another, very significantly stressed our ability to make this work in the ways that we all want.

Accreditors, as Peter mentioned, have assumed roles that are outside their initial purpose of quality enhancement. My view is they've done that reasonably well, but it has been a stress. It is a challenge, and there's some question as to whether it's uniformly applied.
The federal government has had to deal with explosive growth, with always trying to figure out whether we're doing the right things and doing them as best we can, and intense political pressure, while that's going on.

For states, we have the obvious problems of such great differences among ourselves. If one was a pristine, for-profit institution, seeking to do nothing but good, and wanting authority to do it in every state, and willing to comply with regulations, it's nevertheless a very difficult task to get that done. And it's expensive, and those expenses end up in one way or another being passed on to students. So that is a challenge as well.

In states, we have statutes which often very much lag current practice. It is difficult in most states to get these issues of control, of regulation attended to through complex and crowded legislative calendars.

I will tell you that since coming to
Nebraska six years ago, I have wanted to revise our statutes dealing with how we do this work, and I've waited five years for the right opportunity to do that, and still did not have the right opportunity but had a necessary opportunity, in that the new program integrity rules require each state to have a complaint resolution process.

So one of the unintended consequences of the new rules, which have gotten almost uniformly widespread abuse, has been that it enabled me to tell my legislature, say we need to make some changes, or if we don't, our institutions will not be able to participate in federal Title IV programs.

So oh, oh. Well oh. Oh, well maybe we really ought to think about this. And so we were able to do that, and I think we are in much, much better shape than we now are. We were in a state where if that responsible out of state institution wanted authority to
operate in Nebraska, looked to our statutes, they'd have a hard time figuring out how to do it, even who to talk to, what the requirements were and so forth. We have fixed that. A lot of other states have a great deal of work to do in that regard.

So to me, we have a couple of fundamental challenges that centralize the work that we all try to do, and that is first, how can we improve and broaden educational attainment, about which there's pretty wide agreement, not uniform, but pretty wide agreement that we need to do that, while improving quality.

I say it carefully that way: while improving quality. Not just while not letting quality decline, but while improving quality. I think there's a lot we can do across the board. But how can we do that while under such severe financial stress? That's one central challenge.

The second is how can we enable and
support the innovation and flexibility in higher education that our country needs, while retaining the ability to restrain, and if need be, punish bad actors. That to me is the central challenge. How can we come up with a way to enable innovation and flexibility, while at the same time dealing with abuses?

There are some points of common agreement. They're not very good points, but they're points of common agreement, I think. The first is that the interaction between members of the Triad are complex, they're sensitive, and they don't always yield the results we need.

Each of us, in our actions, are imperfect. We don't have the resources, the capabilities that we each need in order to do even our part of the work, for reasons that Peter outlined.

Second, as many have noted, the efforts of the Triad members are sometimes redundant, and that unduly stresses some
institutions, and it certainly adds to the costs, which are passed on to students.

And lastly, despite oversight from three perspectives, we still have abuses and shortcomings. Despite three different entities looking at higher education, and attempting to do some of the same work, we're imperfect about that. We still have problems, which embarrass us all.

And lastly, although most countries, developed countries, would take a centralized approach to dealing with these issues, rightly or wrongly almost no one in higher education is advocating for that, certainly not a federal approach.

However, I feel that we need a more centralized, a more uniform approach to these issues, that while not necessarily federal is national. We just have too much inefficiency in the system, too many holes, too many cracks for problems to solve through.

The most sensitive points of stress,
I think, come from institutions. I deal with public institutions, with non-profit institutions, with for-profit institutions, and I hear essentially the same things from all of them.

Many institutions, especially the non-profit and the public institutions, believe, as a matter of faith and they're largely right, that they place a high premium on the needs of students, and they don't think they're part of the problem. They don't think they are an institution that is part of this problem that we're all concerned about.

Therefore, they have little tolerance for dealing with any kinds of policies and procedures, certainly any additional policies and procedures designed to fix these problems. I think that's reasonably understandable.

I've looked for an analogy for this. We've probably all, many of us flew here to these meetings. Every time we go through the
TSA process, we probably feel the same things. We understand why we're doing that process, but we also know that each of us as individuals are not terrorists; we're not planning to blow up planes. We feel horribly inconvenienced by that, and sometimes it's expensive. People miss connections, so forth and so on.

We think there ought to be a special way to deal with us, those of us who clearly aren't part of the problem. We ought to be able to get by that whole TSA thing and just walk on through. Don't we all feel that way? A lot of institutions feel exactly the same about federal regulations, about state regulations and about accreditors.

To some extent, recognition by a recognized accreditor, or approval by a state was initially meant to provide you some special consideration, a fast line, you know, going past. I think with the additional responsibilities that accreditors have had to
assume on the regulation side, that special line isn't quite so special any more. Maybe we could get back to a point, through some gradation of the off and on, yes or no accreditation status, that provides something like that. The public is monumentally ill-informed on accreditation.

They uniformly seem to believe that it's a yes or no thing. You either are or you aren't. Like being pregnant. You either are or you aren't. No gradation. We try to educate people on that, and it's quite, quite complex. They don't understand. I think that's something that we can all work about.

Possible improvements to the Triad. Maybe we can find a better segmenting tool, a way to adjust the path for institutions that have consistently, over a long period of time, demonstrated responsibility, financial stability, high metrics on measures we care about and so forth. For them, the focus should be on quality enhancement.
That work is best carried out, I believe, by accreditors. For less fortunate institutions, and I emphasize institutions from all sectors, we probably need to shorten the period between comprehensive accreditation reviews, and develop better, more graduated responses to poor performance.

Some entities accredit a very, very wide range of institutions, public, private, large, small, for-profit and so forth. Rationalizing that breadth, under the argument that those diverse institutions share a commitment to high level principles is one thing. We all want to treat our students well, we all want to be transparent; we all want to have high graduation rates and so forth.

But developing standards that are applicable to that broad range is another thing entirely. If you can do that without making them nebulous, and I believe that that's a challenge which we're not meeting
terribly well.

The new program integrity rules will prompt some adjustments by the states. As I mentioned, we've adjusted to that and it's been helpful to us. Now frankly, whether it will do any good is another thing entirely.

So the last question you prompted through some materials I was provided was should accreditation be decoupled from participation in federal financial aid, and as you well know, there's lots of issues there. If that were done, accreditors could focus on their initial tasks. But if they no longer serve as gatekeepers to federal financial aid, who will?

We tried the state approach with SPREE, and SPREE is regarded as a horror story that people don't want to, in any way, entertain repeating.

But then that leaves the federal government, and right now I have never experienced in my lifetime a more general
anti-government tone in our country, and
certainly there's not widespread support for
the U.S. Department of ED assuming a greater
role in oversight of these issues. I,
frankly, would be more open to that than the
majority of my colleagues.

To end, I've spent half my
professional life, before I went over to the
dark side of bureaucracies, conducting choirs
and orchestras. So I've done more than my
share of preaching to the choir, and it's
obvious I can't seem to break that habit.

But I'll end this particular sermon
by thanking you for the attention you're
giving to these issues and these problems,
encouraging you to review the track record of
your colleagues of the past. Those of us who
work in state systems do want to do our part,
in ensuring that we get where we need to go.
We'll be willing partners, and we want to
contribute to solutions.

CHAIR STAPLES: Thank you very much.
Those were very helpful presentations. On our schedule, we now have a half hour set aside for public commenters. We don't have any public commenters signed up.

MEMBER STUDLEY: Can I ask some questions?

CHAIR STAPLES: What's that?

MEMBER KEISER: Can we ask some questions?

CHAIR STAPLES: Oh yes, which allows us an opportunity to ask you questions for the next half hour, which I think is very helpful. So with that, I'll open it up for questions. Jamie?

MEMBER STUDLEY: I'd be interested, Mr. Hill, if you can just tell us briefly, something more concrete about what role Nebraska plays. What do you actually do to hold your state's part of that often tippy three-legged stool.

MR. HILL: Right.

MEMBER STUDLEY: Thank you.
MR. HILL: As I mentioned, we're a fairly traditional coordinating board.

MEMBER STUDLEY: I'm from California, so I don't know what a fairly traditional -- oh, okay.

CHAIR STAPLES: You don't have one.

MR. HILL: You don't have one. Yes, that's right. You don't have one. Coordinating boards, to a large extent, started in the mid-60's, as a recognition that the country needed to deal with people like many of us around the table and in the room, early age baby boomers.

Legislators, governors, looked around and they saw the first part of the baby boom coming. They said we recognize that we're going to have to educate a lot more people than we did in the past. That means that we're going to have to be spending more state money on it. We're going to be inundated with presidents of institutions coming to us, wanting more and more and more.
We want somebody to stand in between us and those college presidents.

We also realize that we're going to need better data on the issues that we're going to look at. We're going to have everybody wanting to do the same things. Several of our schools will want to start engineering programs. They'll all want medical schools. How will we make those decisions?

So coordinating boards were started. Most states have a centralized either coordinating or governing board, some statewide entity that has some authority over higher education. About half the states, a little more than that, have coordinating boards, where the action is generally less directive to institutions. They don't hire presidents. They don't construct the budgets for those institutions and so forth.

But they try to work to ensure unnecessary duplication. That was the
principle initial goal, and many times they were successful at that; many times not. As an example, the state of Texas has three Schools of Library Science, three public Schools of Library Science.

One of them is in Austin; two of them are in Denton, a suburb north of Dallas. So they aren't always successful at doing that. The other form of state-wide governance is a governing board and those do. Higher institutional presidents set institution budgets, so forth and so on.

In Nebraska, as a typical coordinating agency, we undertake studies and reports for the legislature and governor. We provide all data on state-wide graduation rates, enrollments, degrees awarded, etcetera.

We approve all new degree programs that the University of Nebraska or the Nebraska state colleges or community colleges wish to start. So their governing boards will approve a new program, and then it comes to us
to look at state-wide perspectives.

If a building is to be built in Nebraska that relies on tax funds, or if tax funds are sought for the operation and maintenance of that building, the legislature has set it up that they cannot appropriate funds for that unless our board approves it.

We also are charged to approve new institutions that seek to operate. We all need to remember that new institutions start all the time. Some of them will be successful; some won't. If an out of state institution seeks to establish a campus in Nebraska, we approve that as well. Those are some of the things that we do.

CHAIR STAPLES: Peter looks like he wants to respond to that as well.

MR. EWELL: Yes. I just thought I'd give you sort of a national perspective on that, because this is an N of 1, and as you point out, coming from California, it doesn't look like that from where you sit. There are
49 other stories. In fact, there are 70 other stories, because essentially the licensure to operate decision, which you have as part of your SHEEO responsibility, may be assumed by a different agency entirely.

They're usually organized by either the type of education provided, vocational, non-degree, degree and non-vocational, or they are by control, where you have a licensing board for for-profit institutions and a licensing board for not-for-profit institutions.

So those three variables will vary across all the states and there are, as I say, over 70 different ways of getting this done.

MEMBER STUDLEY: Dr. Hill's comments really added, and I thank you both, really added an interesting angle, which is the planning angle. When we look at foreign systems, when we look at other things that aren't done at all, there is a decision being made about investment of at least state public
funds in programs, a kind of channeling or what do we need or what's too much of a certain kind of education.

That's absent from your landscape entirely Peter, because of our emphasis on choice and student-driven and market-driven forces and open access.

If you meet the qualitative standards that are established, nobody says we don't need -- nobody says for national student aid we don't need more of those, and we should narrow this kind of program, and we no longer -- we need people to shift to these languages from those languages, or these workforce degrees to another one.

MR. HILL: You know, actually most states attempt to do that, and we do that in Nebraska. We had a state-wide comprehensive plan. What ultimately happens, though, is you can't get general agreement and you need general agreement. You need some degree of consensus moving forward, unless your plan
document is rather nebulous and rather
generalized.

    We do pay attention to that. It has
served as a, to some extent, a restraining
device on unreasonable aspirations of
institutions. Other times, it didn't. During
my tenure in Texas, what I now believe is
probably the greatest expansion in doctoral
programming ever in the history in this
country went on.

    Even though our board was charged to
be gatekeepers about that, they were really
frankly unwilling to do so. We used to say
quality, need and cost were the three things
that were important.

    The board, for a period of time,
didn't really care whether a particular
program was needed. They didn't really care
what it cost. They would support my
recommendations on the basis of quality.

    So the irony was that an institution
would propose a new doctoral program. I would
tell them I'm not willing to recommend
approval, and they'd say what do we need to do
in order to get your willingness to recommend
approval, and I'd say "spend an enormous
amount of money," because the one thing that I
was not willing to do is recommend that the
board approve an unnecessary, unneeded and low
quality doctoral program.

So we added, in a eight year period,
about 160 doctoral programs in Texas. It was
California envy, part of that was.

MR. EWELL: And can I comment as
well. Just I think the intentionality of the
higher education system is one thing that is
also present in foreign systems. You see very
much higher education as an engine of economic
development, and planning is very much a part
of that.

Now that's a contrast in lots of
ways. I echo Marshall's talking about mission
creed, and that leads into accreditation,
because accreditation is fundamentally
mission-anchored. You're looking at the institutions's mission and whether or not it's being fulfilled. No one's asking the question is this the right mission, is this what this institution should be doing, as part of an intentional system of higher education.

Now independent colleges, you know, it's a different story. But certainly in the public sector, that's something that ought to be taken a look at.

CHAIR STAPLES: Art.

MEMBER KEISER: I was interested in your comments about technology and change, in a system that really hasn't changed. The Department published rules which now require all distance learning educational institutions to have licensure, pretty much requires it, in all 50 states, which is creating all kinds of nightmares for institutions.

I was at a conference in Dallas this week, and walking through the exhibit hall, and seeing the eBooks, seeing the consortiums
of electronic library resources, seeing just the marketing tools, just the electronic, the virtual universities and the opportunities for that, is licensure, accreditation and federal recognition moving fast enough, or is the educational community moving faster than they are, and when will this -- what will happen in 2030, looking 20 years ahead today?

Peter Drucker said that the universities of today will be all dinosaurs, because of the cost structures of the current system that's been, you know, that we are, you know, have been building. Where do you see this going and how do you see regulation keeping up with change?

MR. HILL: No. We're playing catch-up, and I think we have been for a long time. To personalize that, distance learning policy work was part of my portfolio in Texas for about ten years, and during that period of time, we changed our regulations, I think, seven times.
We were doing everything we could to try to avoid stifling innovation, and allowing for experimentation. And the general trend over that period of time was to loosen regulation, rather than to tighten it. But I think we do have a problem with that. I think we are going to have to develop additional ways to do things, other than just the way we did 50 years ago.

We're seeing that a lot happen, and to the extent that that practice or process of delivering learning is impeded by something that any member of the Triad does is a problem that we ought to address.

MR. EWELL: Let me do a quick rejoinder as well. That's why I'm advocating taking a comprehensive look at this entire thing, and saying if we were to project out to 2030, with current trends, doing what they're doing, what kind of a regulatory structure would we want? I don't think that it would be the piecemeal structure that we currently
have. It just can't keep up.

This is personal for me, because our organization is under SHEEO's direction, trying to create a mechanism so that institutions would have a resource to go to, to say who do I talk to in Arizona? Who do I talk to in Oklahoma? How do we get this done on a fast track?

But I think it's the change is there and it's not there. I think if you go to the actual teaching and learning process, there's been enormous change in the way in which it's done, more mastery-based, more short cycle, more asynchronous. A lot of that kind of thing is going on.

But the organizational structure of our institutions hasn't changed much at all. Someone once made the remark, and it was accurate but it was telling, that there are ten organizations in the western world that can trace their history back before 1200: The Catholic Church, the Parliament of Iceland and
eight universities. That's kind of, you know, what we're dealing with.

MEMBER KEISER: But isn't that kind of the problem we're facing, where we have change, dramatic change based on technology, but systems that are still operating. I mean you talked about building buildings and building buildings, we can't -- it's a real question whether we can afford to build buildings.

Why do we need to build buildings when technology provides us different opportunities? So are we now at a transformation, and that's what's causing some of the rubs, that we are unable to cope with the technology change, and those who don't want to change are digging in?

MR. EWELL: Yes. I think that's not a bad characterization. The other thing, though, is it's very -- it's complicated, because all these issues are intertwined with one another. You can't say distance anymore,
because most everything is not just distance. It's blended. A substantial proportion of people taking online classes are doing so from residence halls in universities.

I mean so you can't make the old distinctions, and make them matter anymore.

MEMBER KEISER: I think a better word is "different."

MR. EWELL: It's different, different. That's good.

MR. HILL: But it is new. It is new, and technology has been very disruptive in that regard. But human nature hasn't changed. I mean people still want to donate funds to an institution, so that their name will be on the nice, bright new building.

And whenever an institutional president retires, he talks about what new degree programs were started on his tenure, how much the endowment increased and what buildings were built, not on how student learning outcomes have advanced, not on those
kinds of things. So technology has been very useful, I think, in prompting some consideration about whether we have our priorities set the way they should be.

CHAIR STAPLES: I have a few questions myself. Then I have Anne, Earl and Larry for questions thereafter. The question I have, Peter, for you, you've mentioned in a couple of places the issue of the federal government having better statistics to track learning outcomes. You talked about having more data-driven decisions at the accreditor level, as well as some sort of model legislation for states.

So you're talking about aligning things and creating some sort of commonality. I guess the question that I have for you, and we had a lot of discussion about this yesterday, and I don't know if you were here; I don't think I saw you here, about trying to find common data.

I guess the question for you is
there seems to be a fair amount of consensus so far around that notion that we should have, the system have more commonalities across the Triad, so that whatever their roles are, there are commonalities for gathering, for using and for evaluating.

I guess the question is how do you suggest getting from here to there? What, in a practical way, if that's a goal, what would you suggest? The federal government may not be able to or shouldn't require, but perhaps there are ways in which this group could inspire that process that unfold.

MR. EWELL: Okay. I mean you certainly are singing my song, because this is what -- our organization was founded as a part of the federal government, to create the data standards, which now everybody reports according to.

Let me correct a misapprehension. Nobody has got standard things on student learning outcomes. The data that I was
talking about was retention degree completion, that I think we can do a better standard job on.

No, I think that this group could advocate for greater standardization and commonality of definition. I think that that's what's lacking currently in the accrediting world. We've done a couple of projects, first under COPA, which was CHEA's predecessor, and then for CHEA about five years ago.

I was saying here would be a model set of standards. It's published. You can buy it from CHEA. Maybe not buy it, I don't know. Maybe they give it away. They should. But in any case, it is a set of common data standards that says if we all would adhere to this, we would have a lot less data burdens for institutions, because one of the complaints that we hear a lot from institutions is that different accrediting organizations want different things.
They want it cut differently, they want it counted differently and so on. I think that this group advocating for something like that would help a lot.

CHAIR STAPLES: Thank you. Anne.

MEMBER NEAL: Good morning. First, a comment and then a question for both of you. You all have just, I think, quite probably talked about the problem. No one's focusing on admission, no one's focusing on priorities, whether or not buildings are necessary.

I think that that is really the role of trustees, and I think it's very interesting that a number of the comments we've received, both from trustees and from presidents, have suggested that in fact the accreditation system undermines their ability to focus on those priorities. So I'll let you address that.

But my bigger question is how you both started, essentially to say that you were in agreement that if we were starting a system
from scratch, we would not have what we have now. Now Peter you suggested a new commission to deal with it, but I'd like to have both of you, for us this morning, if we were starting from scratch, and if our focus, and this was the discussion we had yesterday afternoon.

What is the baseline that we have to have, to protect the federal dollar? I mean I think, as we look at the structure now, we're here to protect the federal dollar, to make certain it's not going to fly by night organizations. What is the minimum that we would need to do that?

We talked about financial responsibility as being a baseline responsibility of the Education Department, and we were also considering some common data set that would address the consumer information needs and some transparency.

What would that common data set be, to provide this baseline protection of the federal dollar?
MR. EWELL: I'll take a quick swing at that. Some of those have tried to, in fact, write that. I mean Gates Foundation, Bill Moeller with the Gates Foundation, is proposing a common set of measures for all its grantees, that is really centered essentially around longitudinal student flow, how many students get from here to there, under what circumstances and so on.

I mean one of the things that I think both states, and Marshall, I'd welcome your views on this, and accreditors don't do very well, is essentially management by exception, is the thing that says, you know, 99 percent of the institutions out there are just fine, and if we had a common data set that would flag essentially the places where, you know, it's over the red line, then you could take very expensive analytical talent and go in and take a look at what's really going on.

But we have this false equity
problem, that we're not treating everybody the same, and that that's not fair, whereas it ends up being immensely burdensome to those who don't need to undergo review, that you know, could do something else.

Now you're going to have a couple of people this afternoon who are going to claim that they should be off the hook. I don't necessarily agree with that, because I think there's some things that Princeton isn't doing that they ought to be doing.

But in any case, for most everything, I think you can take a Princeton, you take University of California, Larry, you can take most of those things and say take it off the table, and operate in a different way. I think that's a perfectly feasible system, if we could get it done politically.

MR. HILL: I agree with that completely. I'll use another personal analogy. I spent too many years realizing there was a problem with the sopranos, and
then holding a sectional rehearsal for all sopranos, when really it was two or three sopranos, you know. So the way to deal with that was to focus greater attention on those two to three.

We do a terrible job right now of that in our country, for an institution that I think, to virtually everyone's agreement, is doing the things we would want them to do, still has to go through the exercise of devoting an enormous amount of attention to prove that.

There ought to be an easier way for them to prove that, that meaningful line, shorter line, ought to be more functional for institutions. Because they're spending their time, entirely too much, demonstrating their capabilities to do things that they demonstrate all the time.

One final comment. I agree that trustees and board members need to do a better job about looking at the broader picture,
rather than about focusing just upon institutional aspirations. That is -- that's a general criticism not just for independent institutions, but certainly for publics as well.

We have relatively little of that in Nebraska, because Nebraska has virtually no money to do much of anything right now. That's been the real break on things. But this huge growth of doctoral programming that I mentioned last time, every one of those unnecessary, unjustified programs was approved by a board of trustees.

MEMBER ROTHKOPF: Earl.

MEMBER LEWIS: To piggyback on the question that Art was posing about innovation, and if I look at the Triad and sort of think about the relationship between the state and the federal and the accreditors, in some ways history sort of evolves out of the concern with the domestic educational market, and ways in which we can ensure that indeed, the
investment of federal dollars and quality could be assured.

But one of the things, and Peter you alluded to it, one of the most interesting developments, if we talk about some of the new disruptive technologies may be in education, where a lot of American universities themselves are becoming global entities, and trying to figure out then what are the boundaries, as we go forward, thinking about it's not as much about federal investment as it is about perhaps the quality side.

But as we think about the Triad and its future, is it -- should it remain concerned exclusively with the domestic implications of the deliveries of education that our institutions will provide, or do we have to actually begin to talk about this sort of education in a global context?

MR. EWELL: We already are, and I think that one of the things that's important to recognize is a lot of accreditation energy
right now is being spent on essentially U.S. institutions operating abroad, foreign institutions coming onshore, the foreign student market, all of that kind of thing.

Again, several other countries are eating our lunch on this, and Australia is huge in Southeast Asia, for example. We have to be concerned about our links with that global marketplace. I think that's one where at least the regional accreditors are on, and it's -- you know, more could be done.

But I think that that's a very important point. It's one when I did the CHEA monograph on accreditation, it was one of the seven trends that I identified as transforming accreditation.

MEMBER ROTHKOPF: Larry.

MEMBER VANDERHOEF: Anne Neal asked my question almost verbatim, but there's a little piece of it that wasn't covered, and I'm just going to ask a quick question about that. Again, you both started by saying we
can't even think about disassembling what we have in place and putting it back together. I think not exactly, but that was close to what you said.

Then later Peter, you said maybe this is a time when we needed another commission, and I must say that the suggestion that we need another commission makes me shudder a bit. But I think you're right in this case.

I wonder if we don't have the wrong images when we think about disassembling what we have in place. I think what we have in our minds is more like burning the house down and then building a new house.

I'm not sure that that's the right way to think about it. I wonder if we shouldn't think about a commission, for example, that says okay, if we were starting from scratch, what would do, here's what we'd do.

You don't necessarily, you haven't
necessarily destroyed everything that you have in place. You can then take the pieces that you have in place and say okay, which ones fit where, and where do we have to change a little, and where do we have to add a new piece, and where can we subtract a piece.

That's quite a different thing than burning the house down and then building from scratch.

MR. EWELL: I quite agree with that, and I think that -- I mean the analogy that I always have in mind is evolutionary, biology. I mean you can get from a dinosaur to a bird, but you have to have a viable animal at each stage in between.

That's what we've got to try to invent, is we can imagine where we want to be, but what does each step, incrementally, going to have to look like, because I don't think that tearing it all down and putting it back together again is going to be the right solution.
CHAIR STAPLES: Arthur.

MEMBER ROTHKOPF: A couple of questions. I just want to understand, and I think it was more to you, Peter. Was it implicit in what you were saying, and this is an issue we talked about yesterday, as that in order to get the kind of data we need and particularly in the area of graduation information, which is now impeded by the fact that the IPEDS data doesn't pick up an awful lot of people who transfer, that we -- would you recommend that this group urge that there be a unit record system, that would provide longitudinal data?

I mean it's something we talked about. I think it's implicit in what you were saying, but I wasn't -- I wanted to --

MR. EWELL: Well, I've been on record -- I've been on record many times, that that would be the right solution. I don't think that politically we can get there right now. So I think that one of the things that's
an intermediate in all of this, and we're
doing tremendous amount of work here and so is
CHEA, is developing state capacities to do
this.

With state -- all but four states
now have INPO Secondary, a longitudinal data
system. Increasing numbers of them have
private institutions included in it, usually
as a part of the quid pro quo of accepting
state financial aid, and that's a tremendous
data resource.

If we can link them together, and
we're working with CHEA and with WICHE on a
project to exchange data between K-12, higher
education, the workforce through the
unemployment insurance wage record, in a four
state region, so you can really track what's
going on there.

It can be very powerful, because not
a lot of migration goes on between, say, West
Virginia and Oregon, you know. I mean most of
it is kind of local and you can pick it up in
multi-state consortia. With the addition of
the National Student Clearinghouse, states are
in pretty good shape, in terms of being able
to track students to an ultimate destination.

Would I like to see a federal unit
record system? Yes. I've said so many, many
times. Do I think that it's going to happen
any time soon? I don't know. I'm pursuing,
I'm betting on a different horse at the
moment.

MR. HILL: I'd like to respond to
that, if I may. I also would like to see a
federal unit, student unit record system, and
also agree that we're probably not going to
get one. As representing one of those states
that does not have a system, I find it daily
frustrating, in order to do the work that we
need to do.

Why don't we have a system? Because
nobody in the state has wanted one, because we
haven't had legislators and governors who have
wanted to pay enough attention to data, to
have it guide policy. Institutions have by and large not wanted broad-scale reporting on their activities, and they've been able to keep it from happening.

The ultimate irony to all this is being from one of the four states which does not have a system. Nevertheless, I'm chair of the SHEEO committee which oversees the SHEEO/NCES data contract. So maybe they wanted the most frustrated person in the organization to chair that group.

I'll continue to push for this, and we are starting to make steps, but frankly, it happened only because the U.S. Department of Education, through Race to the Top funds, made it clear that you were not going to have any chance of getting federal aid, Race to the Top funds, unless you had some sort of longitudinal data system.

So despite everybody saying they don't like the Department trying to manage, in my case, it's been a good thing.
CHAIR STAPLES: Thank you for those answers. They were very helpful. What do you think, you know, in light of what's evolving here, and you've given us all sorts of good ideas as to what could be done to improve the system, looking inwardly, what would you suggest for CHEA, as its role, if any, in the evolving system? I meant to say NACIQI. I used the word for my friend, Judith.

MR. EWELL: I was just going to answer, knowing that Judith is right there to check me.

CHAIR STAPLES: No, no, I wasn't. No. I meant to say what's the role of NACIQI, do you see, in a system that's evolving and does it have any role?

MR. EWELL: No, I think it does. The function has to be performed, and as you know, the function was performed without a committee for some time, and I think the idea of having a broadly representative committee with input to the Department, the decision is
still the Department's. But it is a good idea.

But again, as I was gently, maybe not so gently admonishing you before, I think you've got to get out of the weeds, and the individual approval is one thing.

But I think that a very important role for NACIQI would be to be forward-looking and planning oriented, in saying what do we mean by quality, and in the public interest, what should quality look like? What should we be looking for, and what should we be asking accreditors to essentially do?

MR. HILL: Good comments. I don't have anything to add to that.

CHAIR STAPLES: Thank you. We're almost out of time, so I'm going to ask if Sue has some questions, and then it will be the last questions for this segment. Thank you.

MS. PHILLIPS: As it happens, Arthur got most of mine. I'm going to add one other question. Just to respond to the question of
regionality, Peter, you were saying, when you talked about the data-sharing project that you're working on in a four-state region, and tracking K-12, higher ed and unemployment, that kind of sector, intriguing that is, although it speaks to a regionalization concept, which in other venues we've -- and in other work, other times even in your address, we say is regionalization even relevant any more. So --

MR. EWELL: Well, student flow is regional. Markets are regional. None of them -- Marshall and I have had this conversation; it's a big SHEEO conversation, none of these actually follow state boundaries. I mean state boundaries were drawn with entirely different things in mind.

So regionality does have some things going for it in terms of some regional issues. I think it's trumped, though, these days, because of distance education and all of that, by the fact that education is so mobile, and
so on.

There once was a case for regionality. I think there still is a case for regionality to some extent. But it's not nearly as big a case as it used to be. I think in defining the region --

I mean at the very least, one could envision in this accreditation system of 20, 30 or whatever it might be, it probably, even if it preserved regionality, would not have the current regional structure, because the current regional structure is a historical creature.

Going through the history of accreditation is fascinating, because you know you had horse-trading about states. You had, you know, wanted to succeed from SACS and, you know, all that kind of thing. So these things happen, and it's all a series of essentially historical accidents, rather than being planned.

So I think you'd have different
regions, even if you preserved the concept of regionality.

MR. HILL: Those are very good points. When the state authorization rule was disseminated, I had several long conversations with people that lead the Midwestern Higher Education Compact, one of the four higher ed compacts around the country.

Their questions were is there a role for us in dealing with this? And my answer was really the only role, I think, is a communication and spread the information kind of role, because we are presented with a national issue.

The University of Minnesota delivers much of its instruction to students in the Midwest, but they have students all over the country and world. So a regional solution to this was not terribly useful, because while it would pick up maybe a reasonable percentage of the states in which they needed authorization to operate, it certainly would not pick up all
of them.

So the regional compacts and so forth have been very useful in my regard, but not along these lines terribly.

CHAIR STAPLES: Thank you very much. I really appreciate your testimony, and I'm sure we'll be looking to you as we continue this discussion. At this time, we'll take a 15 minute break.

(Whereupon, a short recess was taken.)

CHAIR STAPLES: If the committee could come to order. We'd like the audience to kind of take seats as well, or if you want to have a conversation, please take it outside. We are going to try to move the agenda a little quicker, given that it is Friday and we know some people have early departure plans.

So we're going to begin our committee discussion in a minute, around the first, the issues of the Triad that were
discussed this morning, and then when we are finished with that, it is our intention to begin the afternoon panel earlier, and then which might be before noon, and then when we finish with the afternoon panel, begin our final discussions.

We recognize that not everybody on the afternoon panel is here, and if people arrive late, we will have them come on at that time, even though we may have finished with the other panelists. So with that, I'll ask Susan to begin the discussion about the earlier session.
Issue Two Discussion

MS. PHILLIPS: Super thanks, Cam.

So as we did yesterday, I want to structure our discussion, at least to start, with a question about what is working well on the issue of the Triad, which we'd want to keep, what's getting better that we want to grow, and then move into what are the opportunities for correction, for change, for doing things differently.

Now I noticed in our discussion yesterday that we are more free form than that particular structure, which is fine. But I'll keep coming back to it, and I will keep a running tab of issues that come up that may not be quite on this agenda, but maybe things that we want to include in our consideration for the future.

So with that, let me open the floor to the question of what's working well on this issue that we'd want to keep, what's getting better that we'd want to grow.
CHAIR STAPLES: And with the Committee's permission, I think it might be a little smoother to seek recognition, and then I can keep a tab. I think yesterday's discussion was useful, but I think it might be easier to make sure that everyone gets a chance to speak.

So please look to me to be recognized, and I'll keep a list, and we'll make sure everyone gets a chance to speak. Who would like to go first?

(No response.)

CHAIR STAPLES: Okay. We'll move to the panel discussion. No, just kidding, just kidding. Frank.

MEMBER WU: I have a simple question. At the end of the day, are we producing a written report that is then sent to the Department of ED or to Congress?

CHAIR STAPLES: You mean today?

When you say "the day" --

MEMBER WU: No, no. Not this day.
I mean --

CHAIR STAPLES: Oh, the day.

MEMBER WU: Yes, right. Is that what's been generated. I'm just wondering. It's a written document that will be transmitted to somebody.

MS. PHILLIPS: So the Secretary.

MEMBER WU: Okay.

MS. PHILLIPS: That we approve of beforehand.

CHAIR STAPLES: And I will say that what I hope is that the Subcommittee will take a first crack at that in September, and circulate drafts, and that between September and December, the committee will have, you know, some exchange of information and will come to a meeting in December, fully prepared to either adopt, edit, you know, but eventually act on a draft.

MEMBER KEISER: Are we talking now what works with the Triad? Is that where we are?
CHAIR STAPLES: Yes, that is the subject.

MEMBER KEISER: Okay. I'll give you my viewpoints, since everybody else is passing it. It's an interesting problem, because we, as an organization, my organization deals with it all the time in a variety of states, and first, I think accreditation works. I know certainly we work at it very hard, and we are different because of it, and we are better because of it.

I think the peer review process is appropriate. I was fascinated by Peter's concept or comment that we should have more public members.

I've served on two state licensing boards and an accrediting commission, and I served as a chair of an accrediting commission, and the public members were always, never said anything. They were always in the background, kind of frosting on the cake rather than the cake.
I don't see that as beneficial. I mean it looks good to the public, but it really doesn't improve the quality of the deliberations and the process. I find in the peer review process, the peers are difficult and tough on each other.

I think the public is well-served by peer reviews, because the right questions are asked, because the people who are practitioners know what the issues are, and those who rise to serve as accreditors or members of accrediting commission are the most interested in self-regulation.

So if you had asked me, I believe accreditation, of the three stools of the Triad, works the best. It has its challenges, because -- and I think Peter brought out -- there's the constant threat of lawsuit, the due process requirements create a conservative behavior of covering.

You know, they're process-oriented, so therefore they watch the process carefully.
SACS, of course, had an institution that completely plagiarized another's report, yet that school was not removed because of due process considerations, and those kinds of challenges that the commissions face, which are problematic.

Now the state licensing is a mess. In Fargo, we have the Commission on Independent Education, which reviews all the out of state non-profits, all the out of state for-profits, and all the in-state for-profits. There is no licensure for the in-state non-profits.

The community colleges have no licensure. They are governed by their own boards, and the board of governors for the state university system has, as its mission, to both regulate and advocate for the state university system.

So we have these -- plus we have a board of education, which tries to coordinate all of that. So it's a very political
process, it's balkanized and it's difficult, certainly for the public, to understand who, you know, regulates what. It's even more complicated with the new state licensing requirements, which is us almost -- it is a full-time job for an attorney that I have, attempting to seek licensure in 50 states, where in some states we can't even find who is the appropriate body.

So that second part of the Triad, the state licensing, is all over the board. There's no consistency, and it's very difficult certainly, I think us as a government, to rely upon, to effect positive change within the system.

The third part is the federal government, which is the interesting part, and since I've been appointed by the government, it's hard for me to criticize it, but I will. It has the power and the resources to enforce many of the abuses that most of us read about or are concerned about. It doesn't again, I
would assume, probably because of litigation issues and other issues that step in.

But the government has the right to elicit the action on issues of Title IV abuse.

It has the resources with the inspector general, spread throughout the country, to have manpower when an institution fails or fails to meet the requirements of appropriate public, you know, policy, and it's slow to react.

When I served on the state licensing board, this was a long time ago, but one of my people served currently. When there's a problem and we try to bring together the resources, it's slow to act, slow to respond, and students are impacted negatively because of that.

So of the Triad, the one that we are focusing on seems to be the one that I think is working most effectively for the protection of the consumer, and the ones that we are not, in terms of the state and the feds, I think
that's where a lot of the work could be done
to improve the circumstances.

CHAIR STAPLES: Arthur.

MEMBER ROTHKOPF: I think I'd frame
the issue a little differently from my friend
Art. As I step back and I look at it from the
standpoint of the student, who is the
consumer, but I guess I also, for better or
worse, tend to look at it from the standpoint
of the taxpayer.

The taxpayer of this country are
putting up, a number that I use and I think is
reasonably accurate, $150 billion a year in
what amounts to an entitlement, and it is
growing, maybe not as rapidly as Medicare, but
moreso or less so, but in the same growth.

It's probably the only place in
which the federal government has outsourced
this responsibility to the very people who are
interested in getting the money. We have
outsourced a big part of this. Not entirely;
there is still a federal function. But we've
outsourced it to accrediting bodies, whose activities are paid for by the very institution that they support.

I think it's, in my view, completely untenable, and I don't know if we're talking about the Triad or what, because all these issues are interrelated. In a perfect world, I would agree with the speakers we heard, that we probably ought to blow up the system and say what really is a rational way to both look at the quality of the educational process, which I believe the accreditors do a good job of.

I've been on accrediting visits; I've been in an institution that's been accredited. I think they work quite well, and I think the whole issue of, you know, continuous improvement is handled generally pretty well by the accrediting bodies.

The problem is we've stuck them with the responsibility of being a gatekeeper, and that therefore brings the federal government
on them, and we listen to these conversations where the feds are imposing all these requirements on them, and you know, whether it's -- they have trouble meeting them. They have five deficiencies, ten deficiencies, 18 deficiencies, and we worry about them.

I think the truth is this is kind of where it is. I guess where I come out, is since we're probably not going to blow up the system, I do think that many of the suggestions that were made were very good. I think ideas such as trying to have more sector analysis here, you know, or you need to look at different kinds of institutions in different kinds of ways.

That's not going to be easy, but I think certainly the research universities ought to be handled differently from trade schools and differently from community colleges.

I think the idea of multiple recommendations. It's either not that you
pass or fail -- we kind of dealt with that one
yesterday. I mean it ought to be variations
in here. Life is full of gray areas, and we
ought to be able to deal with gray areas.

I think the need for good graduation
data is critical, and I'm not sure we should
shy from telling the world that if we're
responsible, there ought to be unit record
system. Whether we do it through the back
doors of Race to the Top, I'd be inclined to go
out and say that's what we want.

Having more public members who are
knowledgeable. It may be the public members
you saw. But if you had some public members
who had a background in education, that might
be better, in higher education, and a lot of
them are just don't know anything about it.
They sit there and they don't have a clue.

I'm not sure -- and then I think
it's important to tell the world what
accreditation's about, and to make sure that
results of accreditation visits are available
to the public in a comprehensible way. I think again, that's one of the suggestions that Peter made.

So that's a list of things that I think we ought to be looking at. I might say we don't need another commission to look at this. Maybe CHEA ought to -- CHEA, I keep on saying that. I'm not at CHEA. NACIQI ought to be the commission that looks at and continually looks at what ought to be done in this area.

I'm not sure we have that responsibility under the statute, but I think the Secretary could give it to us.

CHAIR STAPLES: Thank you. Bill.

MEMBER PEPICELLO: Yes. I'd like to just sort of frame Art's comments in a different light. I think that the Triad is, to talk about what's getting done well, or at least getting done, although I am going to go free form on you shortly, I think the Triad does get the job done now.
What Art was pointing out, quite rightly, is it gets it done unartfully. It's often a labyrinth and has some overlapping pieces to it. But eventually it gets done all the things that we want to get done, but just not as efficiently or effectively as we might want, and probably is a person who has much more experience with the Triad than most.

Part of what makes it work, unfortunately, are individuals and Marshall Hill, although I don't -- oh, there he is. He's still back there -- with whom I've worked quite closely, probably more closely than he would have liked on many occasions, has been a leader in balancing that leg of the stool, and that's what makes it work, although it still clunks along, I think.

So you know, it's hard to say that just doing it well, but it is getting done what we want it to get done. Now for the free form. But as we look at it, we talked about today is how can we make that better. I think
that certainly, as we look at parceling out
gatekeeper from academic quality, for
instance, those are issues you need to look
at.

But I think for all parts of the
Triad, I think one of the things we need to
look at, and something we've been talking
about for the last two days, is segmentation
of higher education for purposes of
accreditation and maybe other purposes. To go
to Marshall's example, the TSA, I think that
while that's an apt analogy, there goes along
with that a danger, and that is the danger of
profiling.

So if we're going to look at redoing
the regional scope or how it might apply, I
think we need to say well, are we going to
look at institutions based on mission, on
size, on whether they function in a multi-
state way? Are we going to profile them on
how they achieve a certain set of outcomes?

Are we going to profile them
according to their accounting system, and if so, would that go to only publicly-traded accounting systems, or would that be accounting systems across the board? That might have other implications.

I know frankly, if I were going to profile institutions, you know, you say well, let's look at community colleges, because they have a certain set of issues, or for-profits, because they have a certain set of issues. I'd say we ought to look at institutions that have a Division 1 NCAA football team, because they have a very specific set of issues right now.

So my point is that if we're in danger of profiling, maybe what we need to do is sort of try to get out of the box. You know, yesterday we were talking about graduation rates or is that even something that is appropriate? If we do want to segment higher education, I think we have to contextualize that in the current landscape.
Now Marshall spoke to having to adapt to change, and certainly in Texas, I've watched him do that, on almost a daily basis sometimes.

I think if we're reconceptualizing the environment for accreditation, we need to look at that landscape, because things that we're talking about as problems, whether it's graduation rates at community colleges, whether it's the accounting systems of an institution of higher education, or whether it's publicly-traded, may not actually be problems.

They may be a signal for change, and they may point the direction, or at least one direction that we need to look at going forward, as we try to reconceptualize the structure of accreditation. Okay, I'll get off the soapbox.

CHAIR STAPLES: Thank you, Bill. Anne.

MEMBER NEAL: Well, things are
getting kind of quiet around here, so I'd like to go back to the notion of blowing up the system. I would like to take issue with the statement that it has been working. Why do I take issue? I think if we look at the Education Department's own surveys, the National Assessment of Adult Literacy, which is showing that college graduates have difficulty computing the price of basic office goods, and have difficulty comparing two editorials, to me that suggests something is not quite right.

I think if you look at the 21st Century Partnership, employers saying that they are getting college graduates who do not know how to write, who cannot think critically.

The Business Roundtable came and visited us last time, and showed us a video they're sending out to their new members, to help them train college graduates with what they apparently didn't get while they were in
Richard Arum came, and I thought made a frightening but compelling statement about how little students are learning. Very little cognitive gain in the first two years, and still quite little in four years. So I would submit that there are very significant indicia that this system has not been working particularly well vis-à-vis this quality issue.

Which is why I would like to second, I think, what Arthur was saying, in terms of looking at the Triad and the accreditation piece. I think the accreditation piece can be very good, and I think this is what Peter was saying. In terms of an academic process of self-improvement, I think that indeed is where it works very, very well.

But by putting the enforcement hat onto them, they have lost, I think it's made it very difficult for the peer review teams to be honest, and to actually do the kind of --
fulsome is probably the wrong word, but robust review of the strengths and weaknesses.

I think as it's currently constituted, it's rife with conflicts. You have administrators and faculty on these review teams who often use the process to get more resources. We've seen on numerous occasions, getting back to the question of trustees, where since governance is one of the review issues that these teams look at, it effectively pits the review teams against the governing bodies, the dues-paying nature of the system.

I think these are all conflicts, in terms of the way it's currently constituted, vis-à-vis their enforcement role. I think the public member, again it gets to the issue of -- and you look even here at the NACIQI, most people here are institutions that are regulated, accreditors themselves, and I think that we have a new chairman who is not essentially regulated by accreditation, which
I think is very good.

So but the bottom line is I do think that the current system is rife with conflicts, and that the process of peer review would be far better and far more constructive if we took out the enforcement role.

CHAIR STAPLES: Larry.

MEMBER VANDERHOEF: Again, I agree with that, and I don't think we should dismiss the notion of starting from scratch. But I wonder Anne, do you -- it doesn't seem to me that we really have to blow up the system. It seems to me like we start from zero with regard to deciding what has to be done differently and how to do it.

But I think in the final analysis, there really are going to be parts that will fit into that new composition. Do you generally agree with that?

MEMBER NEAL: I think that's right. I mean I think the pieces are there, and we have to figure out what works well with those
pieces, and then what -- again, I keep getting back to the basic question. What is the federal interest here, in terms of protecting the federal dollar, and then there may be wonderful other pieces such as self-improvement.

But is that a federal interest? I'm not sure that that is. So I think we have to get back again to the basic questions, what will be the baseline, offer the baseline protection to the public, providing consumer information and some indication that higher ed is a public good, and then what are other wonderful functions that are not tied up into that baseline protection of the taxpayer dollar?

MEMBER VANDERHOEF: Yes. So in fact there could be a separation of those two, of those responsibilities. I think we're going to hear more about that this afternoon, I'm sure. Very good.

CHAIR STAPLES: Any further
MEMBER ROTHKOPF: Susan.

CHAIR STAPLES: I'm sorry, Susan, yes.

MS. PHILLIPS: A question to follow up for Anne. If we take the enforcement role out of accreditation, where do we put it?

MEMBER NEAL: Well, I think -- again, this was a discussion we were starting to have yesterday. I mean clearly now the Department of Education has a baseline financial responsibility test that it does, and that has to be maintained, and perhaps modified or strengthened in some way.

Then getting back, and it's a question that I asked of our two most recent panelists. Is there a common set of data that institutions could supply, vis-à-vis demographics, vis-à-vis licensing, vis-à-vis graduation rates, although admittedly it's an imperfect metric, whether or not they actually assess student outcomes, and if they do, what
those outcomes are.

So basic data that will give us the yes go, no don't go information that consumers need to make a decision.

CHAIR STAPLES: Susan, do you have more?

MS. PHILLIPS: Located and collected by the Department? Is this a federal responsibility?

MEMBER NEAL: I think it could be. I think it could be a statement that institutions would supply. You could have -- and then if -- and could certify, and if a citizen or a member of the public or whomever felt that it was erroneous, there could be some sort of review process by the Education Department.

That's a detail I haven't quite worked out. But if you have a statement of basic data from institutions to provide key information, it would need to be audited, it would be need to be accurate, and there would
need to be some sort of recourse, obviously, if the institution is not being honest.

MS. PHILLIPS: Just one more follow-up, as a general concept. In hearing the discussions about differentiation, about parsing sectors, about the TSA fast lane, there's some sentiment about having, for X set of characteristics, and I don't know what X is right now, you qualify as an institution to go through the fast lane.

You're a recognized traveler. You have the viable responsibility, financial responsibility. You have some minimum level of quality, as far as the financial obligations are concerned, something like that. I'm not quite sure what that data set is. Maybe I'm asking the same question that you are.

But that gate, the credentials to get into the fast lane, would be established and enforced, perhaps by the feds? Is that -- I'm not saying this with an assertion, but I'm
wondering who does that? You know, if you established a fast lane with a data set, where then is it located, and how is it enforced, much less, you know, who decides what constitutes the fast lane characteristics?

But the TSA example's an interesting one. Can we profile the ones who we don't need to worry about, and then the others need to go through the metal detectors and the pat downs somewhat. I'm not sure how far that analogy's going to go, but just a thought for consideration.

CHAIR STAPLES: Any further comments? Earl, do I see you sort of moving your hand.

MEMBER LEWIS: Yes. Since we have veered off slightly from the question that Susan posed, and come back, but Anne's summation raises some interesting questions and some challenges.

So let me outline a couple, because if you end up with a hearth and set of data,
let's use graduation rates as an example, then the question becomes, if you look at the entire complex of institutions in the United States, some of us will actually will then respond, as institutional leaders. That means then we're going to take fewer risks on certain kinds of students. What you're going to end up saying is is that one of the challenges for higher ed, the consumers are also the products. I mean this is interesting. We're the only industry where the consumers are also the product for me, in effect.

So if you want to make sure that you maximize a certain kind of outcome, you actually then regulate at the front end who gets admitted into your institution, because you're going to reduce then the risks that you have. I mean so then there comes a larger question about whether that serves the national interest as well, because then what
you're going to have is a higher threshold for entering into a certain tier of institutions across the complex.

That's the challenge and attention, then, as we're trying to figure out one set of metrics. It's not to say we shouldn't; but it's sort of to recognize that on the front end, because we will respond on the back end, if in real life you're going to get penalized in certain ways for certain kinds of behavior.

So that's the dynamic we've always faced, and one of the -- from my perspective, one of the interesting beauties of a system is that many of the complexes allow then different kinds of entry points, and what we haven't figured out is a way, then, to go back to figure out then whether or not, through those multiple doors, individuals then come out with both having the mind and skills that are needed, but also understand how to sort of re-enter at a another point, if for some reason they have to back out.
I mean it's that question there about both quality and enforcement that I sort of think we need to at least put on the table as we go forward, because I know yes, people will respond. I actually think, in going from trustees to university and college administrators, to admissions officers, and they all will begin to understand what the consequences are and direct their behavior accordingly.

CHAIR STAPLES: Art.

MEMBER KEISER: Well, that's exactly the problem we face, and how do you draw bright lines? We spent two years, one of my organizations that I'm part of, we just finished coming up with a quality index, which allows for diversity, allows for different types of populations.

The problem is that it's very -- it's simple, but it's complicated. It is possible, and we're going to be fighting with Congress to establish, you know, not only is
graduation rate, but I think Arthur, you said yesterday, placement was your mark of quality, and then retention drops.

There are a number of factors that go into these questions, and you always, you don't want to limit access, and that's the challenge. So it's been done. I know Representative Andrews has proposed this before, and hopefully there may be some opportunities to look at those types of measures in a, you know, multiple benchmark combination that would come up with a quality index.

CHAIR STAPLES: Frank.

MEMBER WU: A suggestion for a future meeting. I wonder if it will be useful to hear from other countries, or to learn a little bit about the models that others use, because people have talked about well, this isn't ideal. If we blew it up and started over, we'd do something different.

Well, what are the other models out
there? I have a vague sense that in most other countries, there's much more government control. That is, it's much more of a governmental function. It's not outsourced this way. But that's only a vague sense. I don't know the details.

And a quick comment on the concept that's been floated, about some sort of fast lane. So there actually are two models. There was an airport fast lane. Some of you may bought the clear card. So this was outsourced.

It was like a $99 deal, and it was officially TSA-approved, but they had a private, for-profit vendor that set up, that did your whatever, iris scan, fingerprints, and you went through a process to get the card, and there were fast lines. It was literally a fast line.

There's another model though, which is the government's visa waiver program. If you're traveling into the U.S. and you're from
a list, and it changes every year. It's a list of those countries that have had the fewest people coming to the U.S., whose visas were turned down, then you don't have to get a visa. You just have your passport and you come in.

So those two models are very different. One was an outsourced model to a for-profit vendor. The other was a directly administered government fast lane, that's still running. So if we were serious about fast lanes, there are models out there. There probably are in other areas of, places where there's some government role. There's an explicit fast lane. If we looked around, we could probably find what those looked like.

CHAIR STAPLES: Jamie.

MEMBER STUDLEY: Peter Ewell made the comment that we have more players than just the Triad. He mentioned the media, for example, and policy shops.

I think for me it would be helpful
to acknowledge that a lot of our interesting ideas, thoughtful conversation and questions have to do with whether there's a fourth, either a fourth leg or an alternate leg in the effects of the market, in the choices that people make.

I think that's a lot of what Anne and I have been trying to explore, is what is the market already doing and choosing, and how does it speak, and to what extent is it effective, well-informed, potentially well-informed, or is it not a good place or a place for limited market decisions, because of the nature of the information, the nature of the product being extremely intangible. Its results pay off over a very long time.

Earl was saying it's the rare place where the consumer is also the product. It's also what you get is completely different from the other person. We may both choose -- two people may choose to go to Emory and get something quite different, at a quite
different price, over a different length of time.

But for statistical purposes, it looks like they both made the same choice to enroll at X program at Emory. So this isn't a solution or a recommendation; it's simply to tease out the question about the appropriate role, the potential and the limitations for market-based decisions. Then we'll be able to at least have a Roman numeral item to look at that in a clear way, where I think we could populate it with interesting suggestions about what could be better.

It already plays a big part because of the national values related to choice and self-determination. We don't -- some other countries have different systems. They also have different placement systems. You're qualified for X two programs, and we'd like you to go to one of those two, as opposed to our essentially higher education voucher method.
We could then put comments like Dr. Baum's, about the limitations of the market, Anne's suggestions. What happens if you give better information? Do you get more informed choices, and there are members of Congress and student groups who are asking for more direction or more effective narrowing of the field within which people make the choices that we consider acceptable.

So it's a structural comment on the Triad, whether it's really a more complicated creature that gives us more options for how we could pursue that.

CHAIR STAPLES: I'd like to just briefly comment on the, I think what I heard this morning and what I thought came out fairly clearly as part of our discussion yesterday.

I think one of the -- as we talked about the Triad, they have different functions. They also have a different capacity or an interest, I think, in following
whatever advice we get. I guess I say that, thinking that states don't have much reluctance, I don't think, typically to regulate.

But they may have no idea how they fit into it. They may not know what we're talking about here. They may not know there is a Triad. They may not have any concept of the nature of the relationship between what we do, the feds do, what the accreditors do.

I think when Peter Ewell talked about a model act, and there may be a way we can provide advice, and having been in the legislature for a number of years, I remember the receptivity you have, we had to model acts. It was the sort of sense that there was a national platform that you could become part of.

So defining what we think the right actions are for each of the Triad, and then providing some guidance on that, I think, is a very useful function. I think on the data on
whether it's the reciprocity or the coordination, both Art and Bill have talked about the fact that the system doesn't work well for certain types of institutions.

We may be able to provide some guidance about commonality for the system, common standards, common data to guide the legs of the Triad, and to guide them, at least in having a sense of what their role is and then how their role plays into the larger part and the coordination between those. I think the evidence is pretty clear about cost, that one of the biggest elements of cost is the duplication, is having several different entities operating at the same time, without any coordination or sharing.

The federal government's role is to me the hardest, just because there seems to be a real reluctance. I mean we've had, I don't know, every four or five years a discussion around abolishing the Education Department. I'm sure for those of you who work for the
Education Department, that's an unnerving cycle to go through.

So there's obviously some reluctance. You know, you have that should we even have an Education Department, all the way to No Child Left Behind, which is yes, we're going to have one, and it's going to get into every state and tell them exactly what to do.

So I think at the federal level, there's this real lack of clarity, from my perspective, about what role, regardless of our recommendations, the federal government would choose to take on. But at minimum, I think I feel we can provide, based on what I've heard today and yesterday, some very clear sense of how the system can be focused, streamlined, made more effective and defined, and that there are many actors out there who would take that advice, and that would have a real beneficial effect.

Whether we go beyond that is another question. But I think it's important to talk
about what has been a pretty clear message, and I think a pretty clear starting point for our work. Arthur.

MEMBER ROTHKOPF: Yes. Just a couple of points. One, in response to Frank's point about what goes on in foreign countries, I am no, certainly no expert. But I have a little experience. I think the great difference is the centralization of authority, and the absence of state rules. It's really all centered in a Ministry of Education, and it all begins and ends there.

That's, of course, the difference in our systems and the great benefit and challenge of the U.S. higher education system is its diversity. All these missions, all these accrediting bodies, all these, doing all these different things, and at the same time we support them all and say okay, you go to any of these places and you meet these minimum standards, we're going to pay for it. We have the voucher system.
I'd say just two things. One, in looking at the success or lack thereof of the current Triad, I think we have to look at the fact that we have a very low bar for closing down institutions. It's pretty rare. As Art has indicated, you often get litigation if you try and close someone down, and it's often done for financial reasons.

It's quite low, and frankly it results in some of the issues we have, you know, in the press. Not that I -- you know, I don't make any judgments about a lot of them. But there clearly are practices that have gone on involving institutions, in the way in which they recruit and the way in which the students are there, that are going to cause some significant changes, but these practices have gone on.

Really neither the accreditor -- no part of the Triad has dealt with it very effectively. So I don't give the system a particularly high mark for what it's been
The other point I'd make is somewhat related but not totally. Yesterday, we all gave a hard time to the American Bar Association, you know, those of us who are lawyers or don't like lawyers or left the profession. We're happy to beat up on the lawyers and say things like well gee we -- are you turning out too many lawyers?

I don't know whether they turn out too many lawyers or not. It's pretty profitable for institutions to turn out lawyers, compared to doctors. We probably need more doctors than we need lawyers. However, we don't ask that -- we didn't ask the same question of some of these other groups. Are they turning out too many? Are we turning out, I actually said, are we turning out too many cosmetologists? I mean what's the need for them?

And it kind of goes into the whole question of why are we giving the money to
people, and maybe we need more cosmetologists, or we need more radiologist assistants. But do we look at that question before we say are we going to give aid to, are we going to give aid to students to take up a field, where in that particular local region, and remember everything is local, you know.

Someone who's working in, who's going to school in Detroit, where there may not be any openings there, but there are lots of openings in Oklahoma and Miami. Do we take that into account? I actually think we should, and I think we should look at are we giving aid, in the form of both grants and financial aid, to individuals, where they're taking up courses of study where there really are no options?

I'm not talking about how much they'll make and, you know, getting into the gainful employment. Just are there openings there, and what happens. There, you've got to look at what kind of employment opportunities
actually exist. So I think that ought to be part of, some part of this equation.

CHAIR STAPLES: Susan.

MS. PHILLIPS: So we've done a really good job of answering my question of what's working well, don't you think? I want to just give one more opportunity for people to speak to that, what's working well, what do we want to keep, what's getting better that we'd want to grow.

So far, what we have is two items on our list. One is accreditation as a process of self-improvement as something we're doing well, that is being done well, and second, the Triad gets the job done, albeit unartfully and clunkily. We do have a long list of Opportunities for correction, for change and for doing things differently.

So far, what I have in that list is perhaps increasing NACIQI's role in considering the policy questions; taking the enforcement role out of accreditation;
considering who earns access to the fast lane.  
More parsing of sectors, defined in some way  
that we're not quite sure, and how to make  
accreditation meaningful and available to the  
public, and to members of the Triad.

A quick interim summary. I want to  
encourage discussion, again since you do so  
well on following my structure on either  
what's working well or on opportunities for  
correction and change. It gets the  
conversation started.

CHAIR STAPLES: Anybody who hasn't  
spoken like to address those issues? Yes,  
Federico.

MEMBER ZARAGOZA: Again, in terms of  
what's working well, and I don't think we  
should understate the importance of the checks  
and balances. You know, I think that that's  
an important dimension of the overall system.  
I really was moved by Earl's observation on  
access. I think that that's a dimension that  
we have to be very concerned with, either way
that we're structured.

Clearly, there are many moving parts to the system, and I think that the Triad at times is not as aligned, and I'm sure that there's going to be time for discussion of that. But we're looking at issues like placement and retention, etcetera.

A lot of that is occurring at the state level. Certainly for community colleges. So I think that the more that we do the tiered accreditation and sectoral reviews, I think the better we're going to be able to get our hands or our arms around the whole issue of accreditation and the respective roles that we take in that process.

So I think there's a lot more that can be done between the Triad partners, to kind of identify areas of overlap and to enhance the communication system. I was a little bit kind of dismayed that when we talk about self-improvement, that it does not become a code word, I think, for closed
systems.

You know, I think that public member engagement is important, and I think that transparency is important.

CHAIR STAPLES: Thank you. Just before I recognize you Anne, anybody else who hasn't spoken like to offer some comments?

(No response.)

CHAIR STAPLES: Okay, Anne?

MEMBER NEAL: Just to the point on access, I think we're in agreement that there should be no limit on access. That gets back, then, to the question of student success. I think one of the reasons that we're here and we're grappling with these issues, that we're looking at 57 percent of students are graduating in six years; the average debt is $24,000.

Obviously, we want access, and then we want to ensure student success, so that when they get out, they get a job, they can pay off their federal loans and go on to
succeed. So I don't think they're mutually exclusive.

CHAIR STAPLES: Yes, Jamie.

MEMBER STUDLEY: I'd like to share an email I got from somebody in California at the state level, looking for exactly this kind of guidance. So it's to reinforce Susan's question, not to answer them.

In speaking about some help that they were seeking to help the legislature understand what California might do, this person said "It seems that what the Department of Education attempted to tell states was that simply relying on accreditation is not sufficient.

"I would really appreciate details about where the states should take an active oversight role on colleges, and where the state might rely on accreditation."

So I think that's a form of guidance. For many states, they are trying to say how can they lean on accreditation; when
can that be their version of a fast lane, because it's a reliable distinction, and is there something that's not included with an accreditation that the state ought to look at.

It's just another source of the kind of role, that what we do, can play, to help others know how to sort out the Triad as well.

CHAIR STAPLES: Any more comments? Yes, Earl.

MEMBER LEWIS: I had one more. It strikes me, at least we heard this morning, and perhaps even going back to yesterday, that even with all of the inherent conflicts, there's an understanding or say it differently, there's still a valuing of the peer review process.

I mean there's a way in which trying to understand the institutional quality is important, and that it's best done by individuals who actually understand or engage in some type of peer review process. One of the challenges which is on the table is how do
you manage the conflicts, meaning where 
conflicts can be eliminated, you always try to 
do that.

But in some cases, it's actually 
about how you manage those conflicts, and that 
too is sort of there in the discussion matrix 
that we've had for the last few days.

CHAIR STAPLES: Any more discussion? 
If not, with your indulgence, I think we'll 
proceed directly to the panel discussion that 
we have, and I know we may not have all the 
panelists, but we have, I believe three out 
of four present.

So why don't you come forward, those 
of you who are here, and we'll begin the panel 
discussion that we had scheduled for later, 
and if you'd like, if all of you who are 
present are welcome to come forward.
Issue Three-Accreditor Scope, Alignment and Accountability

MS. PHILLIPS: In moving to Issue 3, as you know the three issues that we've considered were data regulation, data needs and regulatory burden, the Triad and now accreditor scope, alignment and accountability.

Again, they're not always separate, these three and the perspectives that we take on them will certainly be informed by the discussions that we have had and that we will have. Thank you so much for joining us.

CHAIR STAPLES: Good morning. We welcome your presentations, and please proceed in whatever order you choose to do so.

MS. EATON: Thank you Ralph, and good morning to members of the Committee. I appreciate the opportunity to talk with you this morning.

Before I get started, Peter Ewell made reference to two documents with regard to
states and accreditation. One had to do with state uses of accreditation, one had to do with state uses of accreditation, and the other had to with accreditation requests for data and how that ties into the broader picture of the Triad.

Both are CHEA occasional papers. Both are available on our website. Both do not involve any charge, and Melissa, I'll send those along to you for the Committee's pleasure, all right. I want to stress several points in my testimony, and then hopefully tie these points to the issues of scope and alignment and accountability.

I start out in my testimony talking about how we frame this conversation, and in a number of instances, it's been framed around the notion that accreditation is somehow or another broken. As an enterprise, it doesn't work, and I'm suggesting, as a number of other people have, Committee members and presenters and commenters, that the issue here is really
misalignment, that we don't have an alignment when it comes to accountability.

Accreditation historically has had primary accountability to institutions. The call now is for primary accountability to the public. Accreditation has standards that are aspirational in nature for the most part. The call now is that the standards be summative in nature, and accreditation is heavily invested, as you know, in peer review and self-regulation, two processes about which there's an enormous amount of public doubt at present.

The reason I mention those things, my second point, isn't to rehearse them again, but to indicate that I believe that, in talking about accreditation being broken versus misalignment, we're overlooking something extremely important in higher education, and I think we put ourselves at risk at doing so.

That is that part of the strength of higher education, as we know it, is the result
of a very strong, long-standing investment in academic leadership from our institutions. Accreditation is built around that.

So my point is that that needs to be acknowledged in public policy. We need to avoid a trap. The more national our expectations are, the less institutional those expectations will be.

We need to protect the opportunity for academic leadership from our institutions. That does not rule out a number of things that we've talked about, by the way, but I do think it's significant. Several times this morning, points have been made with regard to higher education and quality assurance outside the U.S., internationally.

This is an area in which I have done a great deal of work, and no other country has the investment in institutional leadership that we do, here in the U.S. Some are striving to achieve that, and sometimes point out to me at meetings, a bit ironically, are
giving up what we're trying to capture?
Something on which to reflect.

My third point is about change and it's about change, both for institutions and accreditors. I talk about first, the need for focus on performance from our institutions. The public wants to know what's happening to students. I think we could respond to that more effectively than we currently do.

This is familiar to all of us. But if we had some set, and I offered this in my testimony at your February meeting, some small set of performance indicators, whether it's graduation or progress towards an educational goal, or whether the student transfers or whether the student goes to graduate school or in some instances job placement, that information, that information about performance were readily available, I certainly think that would be a gain for higher education, for quality and for the public.
I'm not calling for common standards. I'm not calling for national standards. These performance indicators need to be grounded in the institutions. They need to be driven by the capacity of institutions.

With regard to national or common standards, or even as I look at the degree profiles, my concern is not ideological; it's practical. We have thousands and thousands of institutions out there. If you look at all the institutions, postsecondary, that are accredited, there are over 7,000.

Of them, not all of them are in Title IV. I don't know what it would mean to apply national standards in a meaningful to all of these institutions in this country. So can we take a more, if you will, organic approach to the notion of having indicators of successful performance?

And related to that, a second change over time, is encouraging comparisons among institutions with regard to performance. I
think that this is starting to happen in a number of ways. I think it can go further. The comparison here, I'm not talking about rankings, and I'm not talking about ratings. I'm talking about having information available to students.

If you took something like a web-based tool, like college navigator, and it had those indicators on it, and I'm a student, and I can go look for well, I can already look for graduation. But if I can look for other information about what happens to students, that's the key thing, in the institution, then that can influence my choice about attending a college or university.

Where am I most likely to transfer? There's no guarantee, but what's the history of this institution? Where do students go to graduate schools in particular fields? But if we're going to talk about evolution, if you will, this is certainly a start for us. And again, it's being done in some places.
If we want to publish information like that, we've got several templates, CHEA has, that we've had out there for a number of years, summarizing accreditation, looking at an institutional profile that would include information about indicators that might be considered, again, as a start.

We also, I believe, need to be looking at change with regard to how accrediting organizations operate. There's a huge amount of information out there about accreditation process. If you go to any recognized accreditor's website, you will find this.

It's not always easy for persons outside of higher education or accreditation to understand more steps to make that clearer, because the credibility and confidence in accreditation is vitally important to all of us.

In addition, taking additional steps, and this is not a popular item, to
provide more information about what accredited
status means. It means meeting standards.
But what does that mean? What does it say
about the performance of an institution?
I mention that with some
trepidation, because we took a step toward
doing that in the CHEA recognition policy and
a revision of our standards, and we were not
greeted with praise and flowers strewn in our
path. We met significant, significant
resistance with regard to that.

My fourth point is about a caution.
There's interest in structures other than
regional accreditation. This is intriguing to
me. Five years ago, we were not talking this
way. It's become okay. This is tied, of
course, to the issue of scope, and I'll come
to that in a couple of minutes.

If we want to pursue alternative
models of accreditation, we don't need to do
it through regional accreditation necessarily.
We don't need to do it instead of regional
accreditation. We can just go do it. We can create another 501(c)(3) accrediting organization that focuses on sector, all right, if one wishes. I'm not endorsing or not endorsing that idea.

Texas says it's going to do that, through the establishment of a national outcomes-based accreditation model. But I wouldn't want to see regional accreditation, and everybody around the table is agreed that it adds value in some very significant ways to higher education. I wouldn't want to see that, if you will, cannibalized in the process.

Another caution, and this has to do with the role of government, I think it's important for us to keep in mind that accreditation is the creation of the higher education community. There is a powerful federal interest acknowledged, and Art has reminded us about $150 billion a year. I think that's a lot of money, and he's quite
right.

But I think it's important to keep in mind the distinction between the federal interest on the one hand, and the creators and managers and funders of accreditation, and that is the higher education, the higher education community itself.

We need to work together, but these fundamental questions about scope, about structure, about intent, these are questions that involve the entire higher education community, and changes that would have to come through the higher education community.

Now you can force that, and the Department of Education does. It had a very significant influence on how accreditation operates. But I think it's important to keep in mind that we are talking about an enterprise with its origins in higher education that is maintained by higher education.

My next caution has to do with
really reflecting on the last two days, as an example, the consideration of the various accrediting organizations. I went home and I had nothing better to do for half an hour, so I counted up all the different citations, and if I counted right, I had 147. I may be off, I was tired.

Then I -- that was across eight accrediting organizations. Then I tried to break them down into a number of categories. Where were people concerned? A lot of those citations had to do with standards enforcement. A significant number had to do with substantive change.

They were almost all focused on accreditation operation. Now I heard the words granularity yesterday. I heard the word "picky" yesterday. We were at a level of very, very, very great detail. Is that what the federal review process is to be, needs to be, as we're reflecting on some changes, or is it about the broader issues of the
relationship between the federal government and the higher education community, and how we work together around the very, very important issue of providing quality education.

I am worried about over-management, if you will, and I'm worried about the level at which are entering the discourse and the public benefit that we're all trying to provide.

As I said in my testimony, I see what's done here is enabling a very important process, and I wouldn't like to see it moved to designing or managing that process to the exclusion of the judgment of those in higher education. So quickly, those are just a few thoughts about framing this issue of the future of accreditation.

Please, let's not jettison institutional leadership. A call again for change, change both in what institutions do and what accreditors do, and then a caution, that the federal interest is part of the
accreditation picture, but not all of the accreditation picture, and the need to avoid over-managing.

How does that tie to scope, alignment and accountability? With regard to scope, ultimately, scope is up to institutions and accreditors. You bless scope for purposes of serving -- accreditation serving a federal interest. But need in the higher ed community academics and accreditors to be talking about this.

Second with regard to scope, I really don't think we need to try alternative structures of accreditation at the price of regional accreditation. I think that if there's sufficient interest in alternative accreditation models like a sector approach, that can be done, just as regional accreditation continues to carry on its work.

With regard to alignment, I read the words in the draft over and over and over again, and I take those words to be a call for
common international standards. I suggest again that's not desirable, and I think it's not desirable because I don't believe that it is workable.

With regard to accountability, I do think that several of the changes, to which I spoke earlier about greater emphasis on performance through indicators, an encouragement of comparisons, more opportunity for public scrutiny of the thinking that goes into determining accredited status, that all of those things can contribute to a greater emphasis on accountability, and providing a greater response to the public and its needs for information about what we do, which of course ties to the fundamental issue of the money that is at stake for all of us. Thank you, Mr. Chairman.

CHAIR STAPLES: Thank you very much. I'm sure we'll have questions for you. Ralph.

MR. WOLFF: Thank you, and I
appreciate the opportunity to appear before you. Just so you know, I represent -- I'm Ralph Wolff, and I represent Senior College Commission or WASC.

There's a community college commission as well. We're one of other smaller geographically, one might say, though we reach out to the Pacific Islands. But two main states, California, Hawaii, Guam and several Pacific Islands.

A million students. We accredit 163 institutions. But we have 20 new institutions that are seeking our Accreditation, and an additional 40 who are talking to us. We range in size, our institutions, from 35 students to over 75,000 students. Our region is non-majority. Most of our institutions are non-majority.

So we're not the smallest regional accreditor. SACS and HLC are certainly much larger. But we think our size and our location give us an opportunity to be
innovative, and so I'd like to describe some of the steps that we're taking, that frankly we're going to need to -- some time and support to implement, from both the Department and NACIQI.

We're not waiting for more regulation. We're not waiting for legislation. We're moving forward, and we believe passionately in regional Accreditation. I would agree that if one were to reconfigure the regions, they wouldn't be the same. Nineteen states versus the way we currently are.

But it is the cards that we've been dealt, and we work the best. We talk with one another. We are working on common areas. We're trying to work together with commissioners, as well as the executives.

I want to say that the framing of the conversation in the last couple of days largely has been around the two dual roles of accreditation, gatekeeping and quality
improvement. I would submit to you that that kind of framing no longer works, and I would urge you to move beyond that framing.

Picking up on things that Judith said, but what also my 25-member commission strongly believes, that accreditation has worked well in responding to the questions that have historically been asked of us, but a new set of issues and questions are now being asked, and we need to change.

That change is a public accountability agenda. There is something different in that agenda than a gatekeeping function. I sent out to you a chart. I actually have it in my briefcase, a three-column chart, that shows in my opinion that I've drafted, that the Commission has approved, of the difference between the gatekeeping and quality improvement functions, and why and how a public agenda, public accountability function is really important for accreditation.
Gatekeeping is about minimum thresholds. It's for new institutions, institutions on sanction. But when institutions have been accredited and reaccredited over time, we are not talking about thresholds, in most areas. Quality improvement is about selecting areas where focused improvement can be accomplished.

But I think the public is asking of us, not just Congress, and this is way more than $150 billion in aid, the public is asking about the effectiveness of our system, of both higher education and quality assurance. We believe, my commission believes, that this public accountability agenda is a new role for us, an important role for us, and one that we welcome and embrace, and we are innovating to establish that role.

It's not going to be easy, it is controversial, and I'd like to describe the way in which we are approaching it. We also believe that we can choose to address these
accountability issues, but if we don't, that we will not be serving the public, and today's and particularly tomorrow's students will.

So to put our change in a nutshell, we believe that accreditation needs to shift from a focus on institutional processes, to a focus on results. We've just received grants, 1.5 million from the Lumina Foundation, and have a promise of an additional grant from the Hewlett Foundation, to support the efforts I'm going to describe.

I've also sent to you an overview of the redesign process, and I think it addresses a number of the concerns, at least as an experiment, a pilot of what one regional accreditor would do, and I think these kinds of innovations and other innovations that regionals are undertaking, represent one of the values and virtues of the regional process.

I would just also add 85 percent of students today attend universities and
colleges close to home. So there is real value in being able to address to regional needs. The challenges that we are now innovating to address we think respond, certainly the needs to our region, and they may be useful to others.

We are doing these changes that I will describe, we are undertaking them, because we think they're the right thing to do. We don't believe that we should do them only because we're being forced to, because of either regulations or threat of NACIQI taking action or Congress.

We think this is what our responsibility should be, to meet the changes that are already occurring. So I want to highlight seven major changes that we're undertaking, and we think each and every one of them is significant, substantial, and addresses these public accountability concerns.

One. First, external validation of
retention and graduation rates. For the last three years, we have made graduation rates central to our process we've made a part of every accrediting review.

Our internal studies have shown that as institutions address retention and graduation, that there already is a considerable amount of data that institutions have, well beyond IPEDS, but that what institutions need is better application of that data, benchmarking of that data, and bringing the research that is available, how to bring or how to improve graduation, into the actual infrastructure of the institution.

Our teams need greater training and consistency on addressing what is good enough. We believe strongly that graduation rates need to be reviewed in the context of each institution's mission and student characteristics. There is no single bright line that will work for all institutions.

But there is a need to validate the
graduation rates, disaggregated, of the institutions we accredit. And as we have undertaken our studies and our work with institutions, there are some rates, particularly when disaggregated, that we do not believe are acceptable, and we therefore want to move, work with institutions, to improve them.

We therefore are moving to require each institution to provide us their graduation rates at each degree level, disaggregating by sex or gender, race, ethnicity and Pell, or SES, with the institution's own self-assessment of the appropriateness of these rates and external benchmarking.

We intend to create panels of evaluators who would be trained to work with these data. There would be many different approaches that institutions would use, and offline to work to review them, and to identify where the rates are exceptional, and therefore can be taken off the table, and to
identify those institutions with whom we need to work more.

We have an idea, we're providing workshops, support, what I call student success SWAT teams to work with institutions, to improve these rates in targeted areas.

Number two, externally validating results in key learning competencies. For the past 22 years, we have required institutions to assess student learning. There's been tremendous work, as we already have shifted our entire process to focus more on student learning. There's been tremendous progress made by institutions.

But our own evaluation is that we've tended to focus more on the process of assessment, and have been less effective in addressing what are our appropriate results, and in what key areas should we be identifying results.

We do not believe that there is a single metric or a single measure, but we do
I believe that institutions do have a responsibility in key areas to identify how they are assessing and benchmarking the learning results, to assure that college graduate competencies are appropriate and effective.

In this same way with retention, we have a task force working on this, and they are recommending that we identify such key areas as writing, critical thinking, quantitative reasoning, possibly information literacy, to develop with institutions a set of measures that would be used.

Some could be externally validated, like the CAT, the CLA, CAAP and MAPP. Others would be -- another approach would be using scored, cross-institutionally scored rubrics. Over 2,000 institutions are already using a AAC&U's LEAP and VALUE rubrics. The idea again is to externally validate what is good enough, based on the institution's context.

We again would train evaluators
especially with these measures how to work
with them, to evaluate and to identify within
institutions where we think further progress
would be made.

Our goal is to create learning
communities around these topical areas, to
support institutions to improve. This is not
about minimum standards, but about developing
a common discourse and public accountability,
that we are taking seriously in key areas the
capacities and competencies of our
institution's graduates.

Third, exploring the use of a degree
qualifications profile. Part of our grant
support is to work with a profile. Peter
mentioned it. Lumina Foundation has spent
well over a year developing and studying
international models, the American system.

My commission has reviewed the
degree profile and found that it could add
significant value to the conversations we have
in accreditation, particularly in aligning and
defining differences between associate, bachelors and masters degrees.

We do not see it as a template rigidly to apply to institutions, but we are engaged in the process of exploring how this template might have, or the profile might have value in the accrediting process. We think it might help students, it could assist transfers. These are assumptions that would need to be tested.

Fourth, increasing the transparency of our accrediting process and the results. One of the most common criticisms of accreditation is our lack of transparency. We have a task force on transparency and public reporting. Many presidents and others are on that, including public members, and they are recommending that our action letters be made public.

They are typically quite substantive, three to eight, sometimes ten pages long, that they be made public and that
we work with our institutions to develop a set of quality indicators that would be issued after a comprehensive reviews of institutions, that would be reported publicly and placed on our website.

That's quite controversial, lot say the least. The latter part, the report card if you will, or the quality indicators, and my commission is committed to exploring how we might do this in a way that is responsive to the public's desire to know what did our evaluation mean, but not in ways that -- we want to do no harm, but we also want to be publicly transparent.

We also fifth, exploring multiple levels of accreditation. I should add, part of the foundation of this is that we did an extensive multi-year external review of our current model. We also had six authors write papers on what the future, what a future WASC model would look like, that is focused more on students.
Kevin Carey, who will be here briefly in a while, was one of the paper authors. Art Levine, Woodrow Wilson Foundation, was another. Peter Ewell wrote on the changing ecology in higher education. Brice Harris wrote on the relationship between community and senior ecologists. Pat Hutchings (ph) wrote on the role of faculty and focusing on student learning outcomes assessment.

We had the founder of the International Futures Forum in Scotland, Graham Leicester, who’s working on transformative change in education internationally, with Maureen O’Hara, write a paper on WASC as a public advocate and cultural leader.

These papers laid a foundation, and several of the authors talked about the need to move beyond a single, one-action model or with variations, and to talk about multiple levels. Again, very controversial. We want
to explore both multiple levels, and even the possibility of institutions voluntarily seeking additional commendation or conditional recognition, similar to what the Carnegie Foundation has done with community engagement.

Sixth, we are moving to establish special protocols for for-profit institutions. We recognize we have a steep learning curve, particularly with publicly-traded institutions. The commission has already agreed that we will move with large, publicly-traded institutions to work with an outside auditing firm, to study their finances, to review their finances.

We're working to establish new protocols on recruitment and financial aid. We even are exploring the possibility when certain triggers are met, whether we would establish secret shopper programs of our own or outsource those. But we acknowledge that we need to be much more substantial in our review of these large, publicly-traded and
often venture capital institutions.

Seventh, we are significantly -- we are committed to significantly redesigning our entire evaluation process, to move our focus away from the do-it-all in a visit model, to creating a set of indicators that would enable us to take those institutions that have a long history of successful reaffirmation and say how can we simplify and adapt a process, how can we use public available data, and focus our attention where the need is the greatest.

In this regard, while I'm not saying I would support segmental models of accreditation, I believe that the concerns expressed of Princeton and others, that having a one-size-fits-all model across all institutions makes little sense, and we need to find ways of creating a highly adaptive process that responds to the different kinds of institutions.

Together, these changes will lead, we believe, to a redesigned accrediting
process, that will be accountability-centered, transparent, adaptive to institutional history and performance, and far more cost-effective to institutions and responsive to the public.

These initiatives are bold, untested in some cases. We really have to learn together, and even controversial. But I want to say we are committed to situating the standards of performance within the institution, and believe that is where standards of performance need to be set.

Our role is to validate, that given the institution's mission and context, those standards are appropriate, and to externally make sure that they are externally validated.

We do not believe that is the role of the department or the Congress to set those standards.

So I would be glad to answer questions about other issues, but I want to say that we believe that this is the future direction that accreditation needs to take.
We're willing to take the challenge and to embrace it. We'd like to learn together with you, with the Department, but we're going to need adaptiveness on the part of the Department.

We need to not have a definition that every review has to look at every standard every time we do a review. We've got to find ways to make distinctions between where it is warranted and where it is not. I'll stop there. Thank you very much.

CHAIR STAPLES: Thank you, and those are both very interesting presentations. I think what we're going to do right now is we have -- we're having our lunch delivered, so that we can eat during the process. We're going to take a brief break to have that brought in.

If you don't mind remaining for questions thereafter, it will be very helpful. So we'll take about a ten minute break to have the food brought in.
(Whereupon, at 11:58 a.m., a luncheon recess was taken.)
CHAIR STAPLES: Thank you very much for getting over here. I know that you came a little early than you expected, and sincerely appreciate that. As I mentioned to you a minute ago, Judith Eaton and Ralph Wolff have already provided us with their comments, but have not taken questions yet.

So I think what we'll do is have you present your comments, and then we'll have -- unless Mr. Carey shows up in the meantime, and then he can be our fourth presenter before we start questions. Then we'll start questioning after your presentation. But you have the floor. Thank you.

MS. TILGHMAN: Yes, I do. Well, first of all, thank you for the invitation to come and speak with all of you today. I was telling Mr. Staples that I am very heartened by the attention that this issue is receiving from this subcommittee, and the seriousness
with which you are going about your work. There are many issues that I looked at your agenda, and I don't envy any of you. But I know that the issue that you want, those of us on this panel to address, is accreditor scope, alignment and accountability. So although I have lots to say about other aspects of accreditation, I'm going to try and address those issues specifically.

I hope you'll indulge me for just a few minutes, by giving you some insight into why I have taken such an interest in this issue, and it really is a story. So I'm going to tell you a story. It began with our mid—hi Larry. It began with our mid-term review several years ago.

We are under Middle States, and we were undergoing our normal five-year review. The review team visited. These were peers from comparable institutions, and wrote a report to Middle States that my Public Relations office could have written.
To quote one of the things they said, is that they had never encountered such commitment to continuous improvement. Not too long after that, we received notice from Middle States that the views of those two peer reviewers had been overruled, and in fact Middle States was now requesting a progress letter that documented, and here are the words, "comprehensive, integrated and sustained processes to assess institutional effectiveness and student learning outcomes."

And implied in this letter we received was a threat, that if we were not going to comply with the requirements of Middle States, that our reaccreditation in five years was really under question. So needless to say, this came as a bit of a surprise to us, and we reached out to Middle States and asked if they would come and explain to us what this letter meant.

We had a meeting with a subset of both the staff and the commissioners of Middle
States, who in explaining to us what was, how we were remiss, explained that their ideal happened at another university, where when the reviewers arrived, they were presented with an entire room full of black binders, and those black binders were absolutely chock full of student learning assessments from literally every course that was taught at that particular university.

This was given to us, sort of as a standard that we could aspire to. I have to tell you that this was a sobering experience for those of us at Princeton, because what it suggested is that the staff and the commissioners were substituting their view of continuous improvement, using a definition that we viewed as very narrow, for the view of both the faculty and the administration at Princeton, as well as the two peer reviewers, who had visited us.

It suggested to us that we needed, as a community, to go back to the fundamental
question of what is the purpose of having an accreditation system. As I see it, there are really two important goals of accreditation.

The most important, in my view, is the very important role of providing assurance to the federal government that the federal dollars that are expended in institutions like all of ours are being well-used, and that the federal grants and the federal loans are in fact money well-spent, and are leading to what I understand, from listening to Secretary Spellings in the Bush administration and now Secretary Duncan in this administration, are really the two key goals, which are to have students who embark on a college education actually able to complete that education in a timely fashion, and second, that that education leads them to jobs that take advantage of the education that they have received.

Nowhere in this exchange that we had with Middle States was there even a hint that
those two fundamental important primary goals of accreditation were under review. So we began to think about how we had gotten to this place, where there seemed, at least in our minds, a disconnect between the goals of accreditation and what was happening in the accreditation process.

As you know, I think from a letter that I sent to Commissioner Phillips in January, we would like explore with you two potential solutions to what I think are structural problems in the system.

The first of these is clearly the way in which accreditation agencies are organized in this country, and whether, and really to ask the question, is geography still the most useful organizing principle for accreditation, especially at a time when many of our nation's leading institutions draw their students not just nationally anymore, but we're drawing our students from all over the world.
All of us understand why regional organization made sense when this first was created. It was at a time when traveling around the country was much more expensive and difficult.

But that is no longer the case, and I think the time has come to think seriously about creating one or more maybe many sector-specific national accreditation agencies for institutions whose populations and impacts are clearly not regional in nature.

The second question that I hope this body will consider is whether these sector-specific agencies could work with universities and colleges, that competitively draw students from around the world, to set threshold standards that are significantly more demanding.

I really want to underline that phrase. We are not asking for a bye here. What we're asking is to be held to a higher standard. What would I include in that
standard? Well, I would include, for example, high graduation rates, low loan default rates, excellent placement and career outcomes, demonstrated alumni satisfaction. That's something that's left out completely of accreditation, and yet surely customer satisfaction is something that we should be attentive to, as we judge the effectiveness of our universities in serving the needs of our students.

I would also include a high standard of reaching out to students from diverse backgrounds. There may be many other things that one might want to build into these kinds of threshold standards, but those are the ones that strike me as the most important.

These could obviously vary by sector. I'm not suggesting, in fact I'm actually opposed to the idea that there is a one-size-fit-all here. I think one of the things that I take away from my trying to understand this system is that one size fits
all is part of the problem with how we're thinking about accreditation today.

So these standards could vary by sector, but understanding that these institutions that meet these higher standards, will be judged to have met the principle purpose of accreditation, the assurance to the federal government.

Then if we separate that sort of standard of accreditation from continuous improvement standard, then we can use the accreditation process in a way that is optimally valuable to the institutions themselves, which is to allow the colleges and the universities to do a thorough self-assessment, and then have a stringent peer review that would help them improve the quality of their institution, allowing those institutions to define the aspects of continuous improvement that they are particularly focused in on at that time.

Now I realize that there are -- this
is very complicated, and I realize there are lots of complexities in trying to think about those two issues, and I don't mean to suggest that they are not.

But I think if you were to suggest that you were open to having discussions along these lines, I think you would find an extremely enthusiastic and willing academic community, willing to engage with you in how to set up these kinds of systems.

I also think that the two ideas are not linked completely. They could be separable. You could, for example, have sector-specific thresholds, while retaining the regional organization. I don't mean to suggest at all that these have to go hand in hand.

But I just want to conclude, by strongly supporting the efforts that all of you are taking. I think there is genuine concern in the higher education community, and I think there's a worry that we could actually
do irrepairable damage if we proceed in a way that imposes inappropriate or unnecessary regulatory requirements on well-performing institutions.

A least common denominator approach to accreditation runs a real risk of diminishing educational quality and educational achievement, not enhancing it.

Thank you.

CHAIR STAPLES: Thank you very much. I think we have one more panelist, but we don't have him here yet. So we'll begin our questions for these panelists. Who would like to start? Arthur, and then Susan.

**Issue Three Discussion**

MEMBER ROTHKOPF: Yes. President Tilghman, thanks very much for your testimony and for your thoughtful letter, which came to us back in January. You kind of bifurcate the two pieces there, and the first group of items, graduation rate, placement rate, alumni satisfaction, do you think those requirements
could be imposed or should be imposed on really all institutions, but that if you had a sector-specific system, you might have different cut scores, if you will, saying well, at an institution like yours and others like it, obviously your graduation rate and alumni satisfaction rate are going to be higher than they would be for other kinds of institutions.

But that these are the kinds of questions that ought to be asked of all institutions, and by all accreditors?

MS. TILGHMAN: I do, and I took them, in part, out of literally what the Secretaries of Education have been saying are their goals for higher education. So in that sense, I think those are generic goals. But I understand that applying them, with a one-size-fits-all threshold standard across the board will not work.

CHAIR STAPLES: Susan.

MEMBER NEAL: I've got two
questions. The first one has to do with the regional, the value of regional accreditation. Between the three of you in the course of your discussions, you've made a case for and a case against having the continuation of regional accrediting bodies. How, what is their benefit, and what is their -- what are the drawbacks, from your point of view? Any of you can play.

MS. EATON: I'll start, if I can get this. Thank you, Susan. One, I think we've spoken to a number of the benefits. Clearly quality improvement, all right, is a significant benefit. Clearly what we've been able to develop in terms of effective practices, with regard to quality issues, with regard to assessment, over the years.

We haven't mentioned this, but regional accreditation is a very, very powerful signal to the public, with regard to the legitimacy of an institution. I agree. The public doesn't know a lot about
accreditation. We have tested this over and
over and over again at CHEA.

But the public does know that having
accreditation is better than not having
accreditation, and frankly especially
regional, especially regional accreditation.
My evidence there would be to talk to the
folks from, who attempted to put the Open
University of the United States in place, and
how the time that obtaining regional
accreditation took really got in their way.

Regional accreditation, both stands
on and reinforces some of the fundamental
values of higher education. Academic freedom,
the significance of peer review, the
importance of institutional autonomy, and
makes a significant contribution in that
regard.

Those are just several things that I
would put in the plus category. I know there
are others, all right. The concerns? We've
stated a number of those as well. As
institutions are increasingly national and multi-national, why does regional make sense? How do you deal with regional accreditation in a distance learning environment? I mean we talked about that with regard to states as well.

Another area is whether or not either government, turning to accreditation as a reliable authority on academic quality, and the public is satisfied with regional accreditation, and we've talked about threshold. We've talked about not knowing enough about what accredited status means.

Another area of concern is the one that President Tilghman brought up, which is the direction, the ways in which regional accreditation is operating with some of its current emphases. It's, as some people see it, approach to student learning outcomes, cost factors.

I do think that at times, and I was talking to President Tilghman about this
before we began, what regional accreditation is doing is what the federal government has told it to do. But the view is that regional accreditation is doing it to me, not the federal government is doing it to me. But accreditors are middled in a number of ways, so you get some approaches that you may find undesirable.

MS. TILGHMAN: You know, for me, maybe I can speak in favor of the sectoring approach, is that peer review requires peers. It requires institutions that have comparable missions, comparable approaches, comparables. I think I wouldn't necessarily say size. I think a small institution like Cal Tech, for example, which is much smaller than others in our peer group, clearly is a peer to us. I think if there were such a sector involving like universities, I think you would find that they would push up the standards. They wouldn't lower the standards. They would actually enhance the standards, because they
would want to have institutions in their accreditation agencies that could actually meet very, very high standards. It would be in the interest of the accreditation agency to do that.

You know, I think about Mercer County Community College, which is my closest higher ed neighbor, and it is a very fine community college. It serves the student population that it serves exceedingly well. But I have nothing in common with Mercer County Community College.

Our student body is different, our faculty is different, our mission is different, our curriculum is different. I mean there is so little that we have to really say to each other, other than we reside within the same county in the state of New Jersey.

Whereas I have deep connections and deep understanding of institutions that are clearly not in the Middle States. As I've tried to think about what would be the
downside of taking a sector approach, I think the one downside would be potentially removing from the regionals, institutions who are probably pressing those regionals to increase their standards.

So I think you could find it more difficult, once you take out institutions that are extremely ambitious about their continuous improvement. You might find that it's harder to sort of keep pushing those institutions to get better, and in ways that serves the country well.

But as I think about the -- as I weigh those two, the pluses and the minuses, I think allowing institutions that really are true peers to one another, to conduct the peer review. That includes not just the reviewers, because of course those tend to be peers, but also to have within their accreditation agencies individuals who are really thinking about what is in the best interest of that sector. I think you would, at the end of the
day, have a stronger accreditation system.

MR. WOLFF: If I could, I'd like to weigh in also. First, I want to say that, if I may, defining what are appropriate sectors is not going to be as easy as it sounds. You might have the research institutions, and there are those who want to be and those who are. You have community colleges.

In between the segmentation is not as clearly evident, and what would be appropriate for segmentation, I think, is -- were we to go in this direction. I also want to say secondly how this might occur, any solution might occur.

We are products, and I serve as the president of an agency, the institutions. So in a sense, if institutions chose to reconfigure us as agencies, that's different from this being legislated. I really have a concern about legislatively defining how the higher education universe is to be defined and segmented.
With respect to strengths and weaknesses, let me suggest some, and those, Larry has certainly been on the WASC Senior College Commission, and those of you who have been on commissions. I think there is a really incredible value of the discourse between and among different kinds of institutions.

One of the biggest surprises, I can say, that bringing commissioners onto the commission is the extraordinary variation of the diversity of institutions. So I would say that it's not just, but I do believe that there is important value of having our premier, highly selective institutions to raise questions about other institutions.

But the reverse is also true. What is the public responsibility? How can research universities add to our knowledge about learning? So that two-way discourse is extremely important.

Secondly, I've said before that the
regional configuration, as much as it's an artifact of history, is itself responsive to the cultural needs of different regions. I do believe that SACS is different from New England, that region, and so those needs. In terms of areas of weakness, I do think we have not done as effective a job, and I think having President Tilghman's presence here reflects, we've not done as good a job with our premier institutions, and I think we need to figure out a way.

But I would also say that, as one who heads an organization, we are constantly being or have expectations of applying all of our standards to all of our institutions. I need your help, whatever model we have, that we do this, we do differentiation in an appropriate way, and to the same extent that you might say that we might say to some institutions these parts are off the table and we would keep these parts on.

I would argue the same thing should
be said about the recognition process, rather than having to go through every element and demonstrate we do that for every institution. I'd also want to reframe what's good for the institutions of higher ed, which is the way accreditation has historically been framed.

What's good for the institutions that created us, and what's best for the public who we serve, what's best for the students. Whether the regional model or a segmented model, I would ask that the question be framed toward the public, because the graduates of every institution intermingle in the marketplace.

So the standards of performance are going to be the marketplace, not just where you got your degree, or the kind of institution. We have to keep that in mind as well. I think the fact that we have standards that cut across a wide variety of institutions, and that there's an opportunity for people from research universities to
review for-profit institutions, faith-based institutions, is extremely important, and the reverse is also true. Thank you.

CHAIR STAPLES: Thank you very much. Just one moment. I want to recognize Under Secretary of Education Martha Kanter, and thank you very much for coming. We appreciate you being here.

Just because our question time is limited, I do want to have some others ask more questions. I don't want to necessarily have the panel just respond to that. So I want to recognize Art Keiser.

MEMBER KEISER: Well, if we're time-limited, I'll pass on my question.

CHAIR STAPLES: Well, we have a few minutes. I just want to make sure we have time for you and for others who have them. So go right ahead.

MEMBER KEISER: Okay. Well, I just want to comment that I agree with Ralph on this particular comment. It's always
uncomfortable when you're at the wrong end of a visit that may not have gone as well as you would have hoped, or the team just didn't get it. You know, different types of institutions, unfortunately people bring in their own biases and their own issues sometimes into the accrediting process.

I know on the Commission that I serve, we try really hard to train our team members not to bring in their own biases, and to evaluate the institution based upon the standards, in a broadest possible sense. But that in itself is what is valuable. I would be very concerned if we created a tiered system of where only the elite institutions communicate with the other elite institutions.

There is great value, as a Southern Association member, to be in where we are an adult learning institution, that's not elite but selective, with a Duke University, which is highly selective and, you know, one of the top institutions in the world.
I think we all benefit from that, whether it be a community college or an elite institution. I think we all have to do the same, provide the same assurance to the public, that the quality, the integrity, the processes are similar, so there can be some degree of communication among higher education.

One of the dangers I see is that we fragment that, and the students are left caught between not being able to move from a community college to an upper level university. We need to be opening access and creating the ability of students to move, so that the standards are comparable among all institutions.

MS. TILGHMAN: Could I respond to that? I don't want to leave us with the impression that there is no other way in which regional colleges and universities communicate with one another except through the accreditation process. In fact, I would say
the accreditation process is one of the least effective ways in which regional universities communicate with one another.

I participate in regional organizations of colleges and universities in the state of New Jersey, that really talk about exactly the kinds of common issues that, I think, those of us who share a state and share a governor often have in common. Those are extremely valuable.

So I don't think the issue here is that it cuts off communication among educational institutions of very different flavor. I think the point that I'm trying to make is that peer review requires peers. It requires people with the same backgrounds and the same experiences in higher education institutions.

In my view, where our experience, most recent experience with Middle States fell down was not when we were being reviewed by our peers. But it happened when that peer
review report got into the hands of people who simply don't understand our sector of higher education.

CHAIR STAPLES: Anne is next, and then you, Frank.

MEMBER NEAL: Thank you. I want to first thank you, President Tilghman, for generating quite a bit of testimony from various institutions regarding the regulatory burden.

I just wanted to note, since we've been talking about that, that Michigan says it's spending 1.3 million; smaller private two million, Stanford over a million, Duke over a million and a half.

Certainly, these are incredible burdens, and I thank you for raising that to our attention, and also the amount of intrusion that you have often found, in terms of institutional autonomy and institutional decision-making.

I'd like to then pivot to the
question that you started with, in terms of why are we here, and what is the purpose? You stated, and I think I wholeheartedly support this, assurance to the feds that dollars are well-used. I think a we've been looking at at least the initial structure of the system, financial responsibility and guarantors of educational quality have been at least the baseline framework.

You went on to suggest that perhaps there should be some threshold standards. Grad rates, low loan default rates, placement, alumni satisfaction. Would those criteria -- and then the diversity. Would those criteria in your mind essentially become a proxy for educational quality?

MS. TILGHMAN: Yes.

MEMBER NEAL: And so it would be possible, then for an institution to provide that information on its own. You wouldn't really need an accreditor. You could do that
on your own, and then presumably could use accreditation as a voluntary system, if you found it to be valuable. Is that fair to say?

MS. TILGHMAN: In fact, we keep track of all of those data on a yearly basis. They're available all the time.

MEMBER NEAL: So under your formulation, we could essentially protect financial responsibility through the existing oversight of the Education Department. Institutions could provide basic threshold standards as a proxy for quality, and the institutions could then use accreditors, if they chose to do so, in the marketplace?

MS. TILGHMAN: And you know, one of the things to say is that I don't know a college or a university that is not continuously engaged in peer-reviewed assessment of how it is doing. It does it through every imaginable process, from advisory councils to board of governors.

I think we, as a community, have
always welcomed peer review and welcomed learning from others. I think to allow a university to use such a procedure in order to focus on the things that the university is working on to improve, will benefit the university and ultimately, I think, benefit the students.

Whereas as opposed to having where you need to improve imposed upon you, whether you think that's where your improvement needs to be focused or not.

MEMBER NEAL: And do you think these standards that you've set out as a proxy for quality, that those are sufficient, that the focus, if you will, on student learning outcomes, as documented by a CLA or a MAPP or a CAAP, that that is not a necessary piece to ensure quality vis-à-vis the federal dollar?

MS. TILGHMAN: We have looked at those external learning assessment tools and have come to the conclusion that they do not reflect what we are trying to accomplish
educationally at Princeton.

CHAIR STAPLES: Would it be possible to --

MR. WOLFF: Could I add a comment?

CHAIR STAPLES: Sure.

MR. WOLFF: There are far many other threshold issues that we look at, and first of all, I would say that Richard Vetter, who is a member of the Spellings Commission, wrote a report called the "The Inmates Running the Asylum," and looked at an open market, rejected it, said that really wouldn't work.

Looked at a federal process, rejected that, and looked a national system and rejected that and said the system we have is probably the best one, but it needed some improvement, greater transparency, clarity of standards.

While I'm not wild about some of the evidence in the report, but the conclusions my commission reviewed and supported. But I would say we have an institution. There's a
wide range of institutions, some of which do not have the quality assurance systems. We have institutions that are online that had differentiated and unbundled faculty models, no core full-time faculty.

So these data alone don't ensure. We look at audits, we look at financial budgeting and a whole range of issues. So I just wouldn't want to say that quality is merely a function of graduation rates and student satisfaction.

CHAIR STAPLES: Yes. You just have a brief comment.

MS. EATON: Yes, briefly. I think it's important to distinguish benefits or problems that derive from the structure of regional accreditation, versus benefits or concerns that may exist otherwise. Structure alone is not going to address all the issues that we might want to address, and I'm going back, Susan, to your question and reflecting on that.
What are the benefits and the lack of benefits with regard to, as people perceive them, the structure of regional accreditation, and what is tied to other factors and the same question applied if we were to move in a sector mode.

CHAIR STAPLES: Thank you very much. Frank, followed by Larry and then Earl.

MEMBER WU: Just a quick observation on the issue of costs. I am very sensitive to the high cost of these processes. I would note that the elite schools, though, are the ones best able to bear the costs, right.

So to the extent that it may cost a million or two million or five dozen staff to go through the process, it's even more onerous on a decent public school, that we wouldn't doubt is going to be in business for a long, long time, but that isn't as well-endowed as a Princeton or other Ivys or its peers.

I wanted to ask the following. I'm hearing, I think, three different sets of
general concerns, and I wanted to get a sense if I'm capturing all of this. So one set of concerns is some of the accrediting agency standards may just not be good standards. That is, they're not really measuring something that we, society, need measured, the number of books in the library, for example.

Maybe we just don't really care about that. That doesn't correlate to anything that has to do with whether the institution should receive federal funds, or whether it's a quality school. So that's number one. Some standards may just be bad standards, right?

Number two, though, is some standards are good standards, but it's not one-size-fits-all. So it's not that they're intrinsically silly for any school. It's that they're not tailored to this particular market segment. So they may be good for other schools, public, smaller schools, etcetera.

But the third concern that's being
raised is that for some of this, even if the standards are good, it's just way too expensive to go through the process. That is, even if it does make sense to measure X, the data production required to measure X is frequently, the way it has to be proven doesn't make sense.

So I'm trying to capture all that. But I do have, in addition to the question of have I captured it right, a final question on the data cost. It is, are these single-time costs, once it's been done? Let's say the standards didn't change over time. They do. But let's say they didn't.

Would the costs then be sufficiently reduced so the second go-round, third go-round, given the scale, given the fact that you've been through it once, would that alleviate some of it, or is it not likely to take care of the problem?

MS. TILGHMAN: I think right now that would not take care of the problem. I
think every ten years you start from scratch, and increasingly, because the five-year review has become more onerous, it's actually every five years you're facing these kinds of costs, and I am deeply sympathetic to your first issue, which is that the cost of this to a struggling institution is very significant.

MEMBER WU: Or even to a good institution, not a struggling one, but not an elite one, not a rich one.

MS. TILGHMAN: And having just spent two years taking $170 million out of my operating budget, a million dollars is a big deal to me too, yes.

MEMBER WU: One last thing on the data, just so I understand. This is data that you would not otherwise collect for your own purposes. You might collect it, but not configure it that way. So it has to be repackaged somehow. So even if you have it, it's not in the right format.

MS. TILGHMAN: That's correct. I
think it's a combination of both. Some of it are things that we would not, on our own, collect, and some of it are data that we do collect and you know, it takes 20 seconds to provide, and some of it has to be reconfigured. So I think it's the entirety of it.

CHAIR STAPLES: With the Committee's permission, I think we'll ask Mr. Carey to speak, and then we'll start with the questions from Larry and those who have been previously recognized. No, you're late. We were early.

(Off mic comment.)

CHAIR STAPLES: Welcome, and we look forward to your comments.

MR. CAREY: Thank you. Thanks first on another opportunity to address the Committee. I certainly enjoyed the dialogue last time we were here, and had a chance to look through the agenda and the proposal that you put together, and I think it seems like you are focused on the right set of issues.
So I'll be brief, because I don't want to interrupt what I'm sure was a good conversation that you guys were having before I came in, and just offer a couple of observations that I think are relevant to the, to this panel's discussion.

The whole subject of regional accreditation and what it means seems very important to me, and I think, just an observation I would make, is that regional accreditation, the word "region" has its greatest meaning as a sign of quality. I was talking to a community college president the other day about credit transfer, and she said -- "Well, what are your credit transfer policies like?"

She said "Well, you know, if it's from a regionally accredited school, then our assumption is that it's good. Otherwise, naah. Those other places, we think they're not good. We wouldn't take their credits."

I think that it's fine to have
gradations of quality in accreditation, but it's sort of odd that that's how we've gotten here, that as opposed to having stated gradations of quality, where there is like minimal accreditation and then good accreditation and then good enough for transfer accreditation, that good enough is a function of who's doing the accrediting and not some actual stated set of standards that differ from one another.

It's not how -- we didn't decide to get here. We're just sort of here now. And given the fact that 60 percent of all students who get Bachelor's degrees will earn credits from more than one institution, I imagine that number will only grow over time, as the number of educational options that are available to students increases.

We ought to perhaps have a little more rationality and purpose in the way that we decide how to essentially give varying marks of quality to credits of different kind.
It doesn't make a lot of sense to me that you have one, that really the most important variant of quality and accreditation, being regional or non-regional and that's not the way we decided to do it, and that we would have sort of six different regional institutions that would all have their own, start in a different place.

I know part of the discussion has been well, you know, again, is this sort of an archaic architecture, an architecture of the time when regionality and accreditation was unavoidable, because accreditation meant travel and we didn't have an interstate highway system.

It makes sense to me that we perhaps ought to have more of a single national set of guidelines that would be implemented on a regional basis, as opposed to essentially sort of six different ways of doing things.

Now I say that, recognizing that there are costs and benefits of some kind of
consolidation or nationalization. I mean, I think, for example, that I'm a big fan of what WASC has been doing over the last year. I think Ralph and his team should be commended for the sort of steps forward they've taken in really pushing accreditation to ask more and better questions.

That's the benefit, perhaps, of having multiple actors. You can have differentiation in what they do. But I think that could perhaps still be accomplished with some kind of more uniform regime that recognizes that we live in a very different world now, and particularly when we live in a world where colleges are no longer place-bound.

If, in fact, regional is the thing that matters most, and if a college can serve students anywhere as they can, then it doesn't make sense to sort of be able to take six different bites at the apple and only need to succeed in one of them. So you know, I think
that's something we should consider.

The second thing I would talk about is transparency, public transparency. We've sort of made this bargain that the government, the federal government, with higher education, where the federal government decided a long time ago look, we're not really going to be in the business of asking serious questions about quality. We're going to leave that to you, in the form of your voluntary accreditation system.

You know, the argument for that is very powerful. I want to recognize that. Colleges and universities are very complex organizations. It makes sense that you need expertise and experience in order to be able to do a good job of evaluating them, and peer effects are very strong.

If you look at sort of the research in psychology, what people organize their lives around, other people who are like them and these sort of non-regulatory, almost
social pressures.

Look at professional peer groups, for example, look at people in academia. The thing that a college professor cares most about generally is not what the other people on her campus think, but what other professionals in her peer group around the country think.

But the downside to that, there are two. One is they actually have to be peers, and I think as higher education has become more and more diverse, and we have different business models, we have a combination of public/private, non-profit and increasingly for-profit, I think the social nature of the peer part of it breaks down.

Second of all, there's this ongoing argument that peer review can only happen essentially behind closed doors, or else it will be, all the good part of it will disappear, because if we try to disclose what happened or if we make public the findings of
peer review, then it won't work anymore.

I think allowing peer review to be
the foundation of quality control is already a
pretty big leap of faith on the part of the
public, and I think more transparency would be
a reasonable additional part of that.

That's also connected to the fact
that we sort of struggle with the multiple
levels of accreditation quality, where again,
it's basically just regional is better and
then everything else. There's regional is not
as good. You lose so much information from a
public standpoint if that's all the public can
see.

So I mean, if you take an
organization like Princeton, for example. I
mean Princeton is more likely to win the BCS
football championship than lose accreditation,
frankly, and that's appropriately so, in both
cases.

(Laughter.)

MR. CAREY: But what it means is
that for all intents and purposes, the interaction between the accreditation quality control process and very selective, very wealthy universities is meaningless, from a public standpoint. I don't know the extent to which Princeton or its peers chooses to make the results of its accreditation review public. I imagine they're very positive, so perhaps it does.

But when you have a system where it's up to the institution to decide whether elements of the accreditation review are public or not, you almost guarantee the most interesting things, that there will be an inverse relationship between the information being interesting and the information being public.

So you know, I think a combination of recognizing the growing need for more consistent national standards in accreditation, recognizing that we need multiple levels of quality, where good enough
for a Title IV is one thing, but good enough for most students is a higher thing, and great is something that goes even above that.

I think peer review and accreditation can speak to all of those things. Recognizing that differences in the underlying business model of institutions ought to be strongly reflected in how we choose to regulate and review them, and really having much more of an ethic of public transparency.

Because otherwise, that which is not transparent doesn't matter in the marketplace and for students, and I think accreditation is too important not to matter. Thank you.

CHAIR STAPLES: Thank you very much. That was very thought-provoking and helpful. We were in the middle of some questions, and I'm sure that you'll get some directed to you. Larry, you're up next.

MEMBER VANDERHOEF: Just two quick comments and then a question. First of all, I
hesitate to do this, because Arthur's not here, but I really disagree with the notion that somehow changing the way we group universities is going to affect the interaction locally. I think we would all, if we haven't had the opportunity, we'd be happy, happily surprised at how much interaction does go on between institutions locally.

If you ask them if this had anything at all to do with accreditation and whether that was what was pushing them, they'd say what? I mean they wouldn't understand that at all, because they do it for other reasons. In part, there are altruistic reasons; in part, they're pragmatic reasons. It happens and it will continue to happen, that kind of local activity.

A second quick point. I worry that when we talk about the dollars expended, that we're putting the wrong spin on that. In fact, in at least a couple of the letters, the
wrong spin was put on it. It's not that institutions are hesitant to spend that kind of money on improving the quality of what they do.

That's not it at all. It's that they fret a lot about that money being wasted in that same regard. They're not able to put that money where they really think it should go, to improve the quality of the university.

If you'd just use that as the category and you add up how much money is spent, it's much more than the million or the million and a half, that is, money that's spent toward improving the quality of the institution. Yet that number comes up over and over again as just it, by itself, being the burden.

My question as to do -- I mean I really personally approve and like the idea of having our organizations of institution different than they are right now, and the whole idea of region. First of all, we don't
do very well at -- I mean look at our regions. They're kind of goofy and looney as well, in many cases.

But the fact is that we will be better off if we divide up the pie in a different way. When I start to think about how to do this, I run into at least mushy ground very quickly, and I wonder if any of you have notions about what the bright lines are. I mean where do you stop? I think I know, Shirley, what you're talking about, and I know Ralph and I have talked about this a lot.

I know what the intention might be, but I don't know how you draw the lines around what you're going to do. You certainly have already said you don't stop, Shirley, at the Ivy League, for example.

You don't stop there. There are others. And even the AAU gets in on it. You know, they say okay, well let's do the -- well that, even that's problematic. So how, what
do you do?

MS. TILGHMAN: You know, I don't also have a clear answer, Larry, to that question. But one idea that we've played around with would be the idea for, you know, it has to start with a small organizing group, who then define what their threshold standards are going to be.

Then anyone who is willing to be judged by those threshold standards would be eligible to join your sector group. I mean that, I can think of reasons why that might work. I can think of reasons why it might, you know, not work.

But I think it's going to be difficult, because I agree with you. You know, community colleges seems clear; maybe it's not. Maybe that's even a complicated group, you know.

Research-intensive universities, small liberal arts colleges. But I know there's this huge, huge, you know, very
important group who wouldn't neatly fit into any of those categories. I think this is -- I think in the letter, I said the devils are going to be in the detail, and this is one of the big details we'd have to sort out.

CHAIR STAPLES: Judith?

MS. EATON: A way, Larry, maybe to get at that is again, why do we have to start with structure, which is almost invariably where we start when we think we have a problem in higher education, if the regional accreditors accredit overwhelmingly not-for-profit degree-granting institutions. There are a few exceptions to that, a handful.

What if degree-granting non-profit institutions were free to go to any of these accreditors? Then what might happen over time is you're going to see certain types of institutions going to certain types of accreditors. That, in turn, will have an impact on standards and expectations. I don't know that that addresses the cost issue.
You can achieve this organically, is what I'm trying to say, as contrasted with creating and imposing an alternative structure. Just something to consider.

CHAIR STAPLES: Larry, any more questions?

MEMBER VANDERHOEF: No thank you.

CHAIR STAPLES: Earl.

MEMBER LEWIS: There seemed to be one summary statement that actually most of you, if not all of you, agreed to, and I noted in my notes, and I'm paraphrasing it. But essentially that the standards should be situated within the institutions, that in some ways, that all of the institutions have an understanding about quality enhancement and improvement do so on an annual basis, do it over a period of time, etcetera.

One of the challenges sitting on this side of the table is trying to also deal with the fact that if you look at the larger complex of institutions that are in the sort
of postsecondary education market, that come under the purview both of the Department and federal regulations, and you ask the question. Okay, I can agree with the first part. I mean in my day job, I certainly believe that day in and day out. But the other part of the question then what are the baselines? Because there's a part where as you look, whether you're talking about structures or not and all, there should be some baseline that we all can agree on, that should be included in a set of standards that apply to the tier, in plural, of institutions.

That's sort of getting there with some of the things with WASC, but I'd love for your sort of reflection and thoughts on how do we think about the baselines.

MR. WOLFF: Not an easy task, but as agencies that periodically review what are standards, one could submit that the standards do attempt to get at that, that each of the
accrediting agencies, regional and specialized, have.

I'd like to suggest -- and we divide the world into capacity standards and educational effectiveness. I'd like to challenge and frame. It's partly cost, it's partly in response to your question. The current law or the regulations require that every institution undertake a comprehensive self-study periodically, and be reviewed.

It is an old model, that if I take what people are saying here and have been saying in the hearings, if it is a data-centric model, then the idea of a comprehensive, labor-intensive, across the institution engagement is not necessarily the most useful model for all institutions.

It may probably, it would not be effective for Princeton to engage their faculty, and I think this is what Larry's talking about, the opportunity cost. So what I'd say is that first of all, we have to say
what are some of the data indicators that we could look at that would be offline, that could be used?

Much of it is publicly available. Every major institution issues an annual report, has an audit, report on IPEDS, on faculty and other kinds of things that could be drawn, that do not require the institution to have to engage in additional work to generate.

Then the question becomes where is value added in the process. I would submit even in those regards, a comprehensive self-study may not be the best way of getting at those issues. I do think that the challenge that we have is, which I tried to talk about earlier, around for some institutions, completion is an issue and for others, it is not.

How do we take some off the table? What is good learning, and how do we evaluate it is another conversation to be had, and we
have to be able to have a -- I don't know if I would call it a multi-tiered approach. I don't think that's the right way to approach it.

I think we need a nuanced approach, a sophisticated approach of what kind of learning objectives are most appropriate to a Princeton or an Amherst, that might be different from a comprehensive public institution, where someone is there to get a teaching credential.

CHAIR STAPLES: Earl.

MS. EATON: I remember one time that a member of our board of directors pounded the table and said let's get rid of the ten percent of the worst accredited institutions in the country, and that will improve accreditation, right? And people looked at him and said how are you going to identify them, all right?

I think that's the issue that you're raising. The suggestion that is being floated
here, I think, in different ways and at different times is if we had a set of indicators or proxies, such as those that Shirley mentioned, but I don't think for this specific purpose, but that Anna's been mentioning, has mentioned two or three times, those proxies could be used as the baseline with regard to every institution.

Of course, the enormous challenge there would be to identify what those ought to be, and they wouldn't be all tied to institutional academic performance. Some of them would be fiscal in nature, and would we be willing to go there?

The attempt, I think, Ralph may disagree with me, to take the essentially standard -- essentially the standards of formative evaluation, which is what especially regional accreditation standards are, and to twist those into standards for a summative up or down judgment, is a way, I think we should not do.
How do we complement what is going on with accreditation, yet get at, Earl, what you're describing in there, a couple of examples on the table, and I'm dodging the issue that Anne has raised several times about therefore, do we need gatekeeping. But within that, we might find some answers.

CHAIR STAPLES: Thank you. Jamie, and then followed by Susan.

MS. TILGHMAN: Could I just -- a quick addendum, a quick and obvious addendum to Earl's question, which is again, thinking about what is serving the public good here, there is no question that our accreditation agency should be primarily focused on those institutions who are not serving the public good.

I worry that what has happened is in, that over time, we are getting to a place where we are not -- that is not where our accreditation agencies are really focused, which is how to ensure that there aren't
institutions out there that are using, taking advantage of students and federal aid dollars, and accomplishing virtually no education at all, and getting the focus there, seems to me, a very high priority.

CHAIR STAPLES: Jamie.

MEMBER STUDLEY: All of you have raised a lot of interesting issues. I have a couple of different dimensions of this. One is I think we all want to be sure that we neither privilege nor profile, thinking of profile as a negative and privilege as the opposite.

If we're setting baseline standards so that, and we have talked here, for those of you who weren't able to be with us, we have talked about the possibility of separating the baseline from the continuous improvement process.

What do you need for Title IV eligibility, versus what do people elect to do, as peers, for their own improvement, for
status, for scholarship eligibility and professional standards for other reasons, and with whom.

I'm very loathe to spend what I would imagine we will find is our limited ability to recommend things that are politically challenging, expensive, burdensome in any way. So I think Judith's point about not tackling structure, if the issue is not truly structure, and much of the structure doesn't come from us.

It comes from historic development of a particular system. So your institution could voluntarily join with others to create a new way of meeting both your peer review interests and your collaborative interests, and to meet Title IV eligibility criteria.

The way I'd ask a question that might be useful for us is whether not that we should compel the regionals to all join up, or to eliminate somebody so that somebody else can do it, but are there incentives we could
create for encouraging best practices, or barriers that we by statute or regulation have created, that stand in the way of alternative approaches?

That said, I just want to mention. I'm sorry Art Keiser's not here anymore, because I would like to agree with him. As a college president of a selective liberal arts college, I learned more about assessment, continuous improvement and understanding how to tell what learning was going on in my institution, from LaGuardia College and Miami-Dade, from Alverno and Evergreen State and Portland State, than I did from my college type peers, where we attempted to be a leader among our peers.

That doesn't mean that for every purpose it made sense for me to work with them in every way. But I know that the state-based activities that I was doing with a variety of, a cross-cutting variety of institutions in the state, were designed for very different
purposes, from cooperation to public relations to state lobbying for private school funding, and were not around the issues of understanding what it meant to know what people had learned, what capacities they had developed in the time that they were with us and with my faculty.

But you see, I'd be interested in what each of you have to say about those incentive barrier kinds of questions, because do no harm isn't always applicable. But one of the things it means is get out of the way of the positive improvements, or encourage, you know, don't be a barrier in their way, or help make it possible for them to move forward.

So it may be Judith, Ralph and President Tilghman and all of you might want to speak.

CHAIR STAPLES: Anybody like to respond?

MS. EATON: Several things, Jamie.
One, Ralph made the point at least twice today, and it's come up before, that institutions are required to go through the same comprehensive review over and over again, even if it is ten years and it really isn't ten years, I think, about anywhere anymore.

That's contrary to the way most countries carry out quality assurance, although they're shifting more to the way we behave, to the periodic review. But what if there were a way, and I don't know what it is, to be satisfied about the basics of an institution, such that we did not need the periodic, comprehensive review on the regular cycle, all right, is one way, is one thing we could look at, and encouraging some or piloting that in some ways.

Another area where I think we need some incentives, a number of have sat around here and said we don't think the accreditation standards are high enough. Well, how do we define that? If we should be concentrating on
the institutions with the greatest problems, how do we identify them and how do we focus on them, all right, for the future? We need an incentive to create some mechanism for that, and then third, if we want to explore this issue of differentiation within or outside of regional accreditation, and perhaps based on sector, we need some incentives and some ways to look at that as well. All of these things, or at least two of them have been mentioned as ways to strengthen accreditation to serve the public interest.

CHAIR STAPLES: Ralph.

MR. WOLFF: Well, I've commented on it before and I will say it again. I think that I am very constrained by your process. I just want to say it. We have to have a visit, we have to have a self-study. I mean this is really challenging, but do Stanford and Cal Tech need a visit?

MEMBER STUDLEY: I'll tell you one thing. I don't want to decide, just because I
know their names, that they don't need a visit. But your point is well-taken. What is coming from our statutes, our regulations and our process that keeps you from doing something that seems smarter, and would still satisfy the bottom line requirements that we all, I think we all agree on.

MR. WOLFF: And so I would say that it's to look at could we create some zone of permissive or innovation and explore it and assess it and determine alternative approaches? I worry about the profiling effect of segmentation. Every solution has its own set of problems, and the term profiling is one I might not have come up with.

But I would say that there are many institutions that would feel that whatever accreditation they have is less than or secondary and not an impact. I think the real question is what are the standards of performance around key areas, and this is
where I would agree with Kevin.

It's not just that regional accreditation may be better or gold standard in other venues, but what are the standards of performance that we apply? The ability -- then so I would say a number of our regions are looking at separating out compliance and improvement, and even our compliance models, like the Sachs off site review, are all standards, and very voluminous processes.

So I would welcome working with people in the Academy and with the Department, about alternative approaches that puts the emphasis on the right syllables for different kinds of institutions. That's where we need help, and we need regulatory adaptiveness to permit that to happen, but that assured you that our criteria were adequate.

I think there is enormous value to expanding the conversation about what are the metrics. I'm not convinced that it's just graduation rates, given their complexity, or
just default rates. There are a lot of issues of capacity. We are seeing a fundamental shift in the faculty role, even at residential-type institutions or brick and mortar-type institutions.

We need conversations about how do we look at quality in that context. How do we conduct evaluation processes for online learning, when our frame is visit-based? So what I'm saying is that whatever the structure, the kinds of questions that need to be what will assure quality at the end of the process, and how do we become more transparent?

I think we need to have conversations, and have some give and take with you all on an experimental basis. I would submit that what we're doing, what the Higher Learning Commission is doing, what the New Pathways project, are very interesting models, that we ought to collaborate on.

But our goal should be high
accountability, but also appropriate allocation of cost.

CHAIR STAPLES: Susan, and then we're running out of time. I don't want to cut people short, but I want to make sure we get --

(Off mic comment.)

MS. TILGHMAN: All right. The only thing that I would add is that I completely agree with you, that nobody should get a pass, and it should certainly not be based on reputation.

But I do think we can develop, as Ralph said, a series of metrics, that we are persuaded would give confidence to the accreditation agency and then the federal government, that this is an institution that is financially, you know, solid, and is serving the best interest of its students, and sending them off into productive careers.

I don't think that is going to require voluminous amounts of data. I think
there are -- whether I've got the right set, I wouldn't presume to say. But I think there is a finite, reasonable set of information that were it in the hands of the accreditors, they could with confidence turn to the Department of Education and say we are confident this is an institution that is serving its students well.

And then, the great benefit of being able to do that, is then the accreditation agencies are really going to focus on the institutions that we're worried about, that are not fulfilling those needs.

MEMBER STUDLEY: I would just add or, if it turns out that they -- once they can identify who those are, that maybe that's not a role for accreditation, because peers may not be good at saying you flunked. So there are different recombinations.

MS. TILGHMAN: Absolutely. I agree with that.

CHAIR STAPLES: Susan
Many of the comments that I was going to inquire about have already been echoed around the table. So I want to come back to something that Ralph, you had mentioned, and I ask this in the context of what President Tilghman had mentioned.

You included in your discussion about what WASC is doing, a couple of notions that are, I'll call them relatively new to the accreditor role. One was sending in SWAT teams, and another was creating learning communities.

In those, what I heard was an active agent of quality improvement, as defined by the accreditor, as opposed to the accreditor being merely an evaluator, rather than now. The accreditor as active agent. So I was intrigued by that, as a role for an accreditor, and then put it into the context of Princeton's experience with their accreditor, and wondered if the two of you or others might sort of address that role of an
accreditor in shaping the educational quality of the institution, as opposed to being the mechanism by which it shapes itself.

MR. WOLFF: I might begin to say that it's not so much a new role, but it's an expansion of a role. One of my sound bites is you can't regulate yourself into the future.

Regulatory action is retrospective. Enormous changes are occurring in higher education before our eyes, and the students, the modal student today is not the historic, traditional student.

Peter talked about it, new delivery models. Students are taking distance ed on campus. I mean there are all kinds of things that are happening. The kinds of questions, once you get beyond threshold levels, we believe, my commission believes, are the kinds of questions that require less regulation but more innovation, more responsiveness.

That's where the learning community is. How can we learn from one another that
are best practices? Our experience has been that even our best institutions, one some of these issues, can learn from one another. But also what is good learning is one that we all need to be in a conversation about, so that it's not reduced to a single metric, or to a very narrow workplace competency, when we're also trying to prepare students for a lifetime of career change and a meaningful life.

These are conversations, not regulations. So first of all, with respect to, let's just take a very concrete issue, graduation rates. There is some very high quality research on cost effective ways to improve completion. But it has not filtered its way into many institutions.

So we believe that if we are going to make it a key element in our review process, then we need to assist institutions in how to improve those graduation rates. It's not simply either you meet that rate or we're terminating your accreditation. But it
is how, for a particular subgroup, would that work. The same is true with particular -- what is good writing? What is critical thinking?

That is -- we would like to engage faculty in those kinds of conversations, but do it in a way that allows it to be centered within an institutional context. I will say that years ago, it would have been true to say that many of our best institutions were opposed to learning outcomes assessment or challenged it.

But now, we're finding some enormously, I think, excellent work being done at some of our best institutions. How do we bring that into the whole community? So we're trying to explore ways that that could be done, in a convening role, in a learning together role, so that when we do conduct our evaluations, that actually we're able to talk about standards of performance, and something deeper, at a deeper level about learning, than
how did you perform on a CLA or a very
simplistic reductionist view.

MR. CAREY: Yes. I agree with much
of what Ralph said. It seems like the
conversation has done a good job of making a
distinction between minimum standards and
aspirations, between regulation and peer-
driven continuing improvement.

The minimum standards/regulatory
part of this conversation, a lot of it is
about money. It exists to protect the
taxpayers' money. It exists to protect the
students' money.

A lot of the judgments that we make
about institutions are financially based.
Will they be open next year? Can they pay
their faculty? Do they have enough resources
to provide a minimum level of quality?

One way to kind of get at that is
right now, the organizations that are making
these financial judgments don't have the
financial stake in the decision. If it's the
government that's making the judgment, then it's the government's money. So I think this was brought up at a previous meeting.

One could imagine holding accreditors financially responsible for the financial bad consequences of their accrediting decisions, because you know, they're members of your organizations, right.

So if you're a member of Middle States, for example, and Middle States makes a bad choice and gives accreditation to somebody who it shouldn't, and the taxpayers lose and the students lose, you don't lose.

So from an incentive standpoint, I think if the accreditors had a financial stake in their accrediting decisions, perhaps they would kind of come at that from a different standpoint. They would have reasons to build resources and expertise, which you need in order to make these decisions.

On the other hand, if we're talking about aspiration, if we're talking about
excellence in student learning, if we're
talking about continuous improvement, then
we're beyond regulation. Ralph is exactly
right. You can't have a compliance mentality.
No one became excellent or improved or met
the future or what have you because the
government wrote a law telling them to do it.

Those kinds of things only matter if
the people involved believe they matter, and
both implicitly and explicitly endorsed the
standards.

So I liked what President Tilghman
had to say about groups sort of voluntarily
saying this is the bar. I think that that
should be, perhaps this is your implication,
structure-neutral.

In other words, you don't have to be
this or that kind of university or college or
what have you, as long as you're willing to
kind of get to a certain place. So that
would, you know, move the conversation more
toward the kind of outcomes that Ralph is
talking about, and different organizations can make different kinds of choices and embody different kinds of values when it comes to those standards.

But it would all be disconnected from the regulatory Title IV process, which is just very different and requires a different set of expertise, process, standards and attitudes, quite frankly.

CHAIR STAPLES: We have -- I'm sorry?

(Off mic comment.)

MS. TILGHMAN: I would just -- very quickly, I can do this really quickly. I would just underline something that Kevin said, that continuous improvement is a value that is either embedded in an institution's DNA, if you'll excuse a molecular biologist using a term of art, or it's not. I agree completely, that it is very difficult to induce continuous improvement simply by federal legislation.
On the other hand, if we were to -- if you, rather, were to in the future adopt a system not unlike the one that Anne Neal was proposing much earlier, I think most institutions that I know would welcome voluntarily, every ten years, going through a rigorous peer review, that looks at the efforts that the University or the college has undertaken, in order to achieve continuous improvement.

I think it would be, you know, whether it becomes voluntary or whether it becomes mandatory, I think it is a very good thing for an institution, to take time once every ten years or so, and really very seriously and comprehensively reflect on what its weaknesses are and how it needs to move forward to improve as an institution.

But allowing the institution to define, you know, its own weaknesses and how it's moving forward to improve those weaknesses, is the way I would put it.
CHAIR STAPLES: I know that Arthur had a question and Larry has one, and I think we'll wrap up.

MEMBER ROTHKOPF: One brief question to Ralph. Just before the break, you outlined your seven initiatives, transparency, multiple forms of decisions, recommendations, etcetera. I thought they were really very important and I don't want to lose sight of them.

My question is what kind of reaction did you have from your institutions to that, to these initiatives? Were they receptive? Have they been?

And secondly, to what extent are other accreditors following the lead of your organization, because I think what you're doing is something that voluntarily I don't like the idea of the rule coming down from the top. But I do like the idea of an accrediting body adopting some standards and some initiatives that I happen to think are very good and actually very consistent to what we
heard from Peter Ewell this morning.

So I'm interested in the reaction, both in your region, but also around the country.

MR. WOLFF: First of all, we're about, I don't know what I'd say, 25 percent into the process. So the commission has embraced each of these goals. We have task forces on each, and the task forces are comprised of wide representation from a whole wide range of institutions.

Each of these have been affirmed by the task forces. Now we're filling in how would we do it, what would be the reporting mechanism and the like, and that's what the funding will be used to do.

The pushback has been around multiple levels of accreditation. That's scary. What would that look like, a report card or a quality indicators report? How would that be? Very considerable concern about that. Publishing and focusing
institutions even more heavily on retention and graduation concerns, that that will lead to a lowering of quality. We don't believe that to be the case.

So the devil is -- a lot of the devil will be in the details. But I will say that at the commitment of the commission has been affirmed twice unanimously, that this is the direction to go, because it builds on what we've done, it's the right thing to do, and will address the future.

One thing I didn't say is we have a task force on changing ecology, because we're scanning the future and saying that whatever model we have is going to need to adapt to these changes that are already occurring.

As far as the other regions, we're sharing it. One of the things that the regions that we're all talking about is how do we look at the issue of transparency. So there is some considerable interest in what will happen when we make, assuming we do,
which I hope we will do a year from now, all of our action letters public and have them on our website. What will be the implications?

I will say that we'll have to figure out how that will work and will there be an executive letter, if there are private issues. But we're clearly committed to moving forward, and I'm sharing the results, or at least what we're doing with the other regions, so that we can see how what they're doing fit into a common agenda, of trying to be more responsive to these public concerns.

CHAIR STAPLES: Larry, you have the last question, and then we have to get to our third party commenters. Okay. Thank you very much for coming. It was a very useful conversation, and we appreciate your time and your input.

Public Commenters' Presentations

CHAIR STAPLES: We'll now proceed with the third party commenters. Why don't you all, the three of you come up? Joseph, is
it -- I don't know if it's Vibert or Vebert, Susan Zlotlow and Bernie Fryshman. Forgive me if I didn't pronounce any of your names accurately. Mr. Fryshman, why don't you go first? I know you're looking to get to transportation. So I would like to have you have that chance.

MR. FRYSHMAN: Okay. Thank you very much. I very much appreciate that. I will speak a few words about accountability for accreditation decisions, and I guess I was very pleased that at the end, I heard Ralph talk about some of the other elements of outcomes, and identifying elements for accountability, that have nothing to do with structure and nothing to do with graduation rates and placement and commonality, retention as proxies for learning. They're not. They're numbers, and sometimes the numbers make sense, sometimes they don't. I was troubled, and again I'm appreciative to Ralph for at least touching on some of these
things. We should be talking about things like deep reading, critical thinking, confidence in addressing problems, lifelong learning. The transformation, we still believe in that.

I speak for my agency, for the rabbinical schools. That's what we're all about. We are looking for the transformation of the human being, and where I teach, well, when I teach, I also look for that. These are not elements which are easily measured. They're measured by experts

They're not measured by numbers, and sometimes the numbers paper over the reality.

So we're focused on -- we're diverted. We're looking for things which are not really relevant.

Now I'm not here really to say what other agencies should do. Every agency should have a right to do what makes sense in its own field. Every agency should be able to define what its field is, establish. The onus should
be on the agency to establish, through the
Department of Education, what makes sense and
why it makes sense and how it's going to be
measuring.

But the word measuring doesn't mean
measure with a yard stick. It means measuring
with tools which are characteristic of what it
is you're trying to measure. Numbers, at
least in my kind of education and in certain
other kinds of education, make no sense.

They may have, they may make sense
in agencies where there is an occupational
component, where you can count success, you
can measure success. You can use these
placement and job rates as a proxy for
success.

Not in every kind of learning, and I
guess that would be my message to the
Department of Education, that even though the
regulations are one, the standards are one.
But the way in which you impose the standards
has to be done with a great deal of
I thank you very much, and once again, I very much appreciate your giving me the opportunity to speak first.

CHAIR STAPLES: Thank you, and thank you for your comments. I appreciate your time. Whatever order the two of you would like to proceed, go right ahead.

MS. ZLOTLOW: You go first.

MR. VIBERT: Good afternoon, Mr. Chair and members of the Committee. My name is Joseph Vibert. I'd like to take the opportunity to respectfully remind you of a group of not insignificant stakeholders who are very interested in these proceedings.

I'm executive director of ASPA, which is the Association of Specialized and Professional Accreditors. ASPA represents 61 agencies that assess the quality of specialized and professional higher educational standards for education programs in the United States.
Our member accreditors set standards, to ensure that students in educational programs receive an education consistent with standards for entry to practice, or advanced practice in each of their respective fields and disciplines.

More than half of ASPA members are recognized by the Department of Education, and 14 of those have Title IV responsibility. The others who are recognized by the Department, have other federal linkages which have not been brought up in these discussions. So I'd just remind you of that.

Protection of our stakeholders is the primary concern of professional and specialized accreditors. This includes potential and current students, graduates, programs, consumers of our graduates, services and state and federal governments.

Programmatic accreditors serve the important role of ensuring that when students complete programs, they possess the necessary
profession-specific competencies to interact safely and effectively with the public. These specialized competencies are very different from the competencies that may be required for accreditation at the institutional level.

It's interesting that in this day and a half that's been devoted to the discussion of accreditation, that no programmatic accreditor was invited to make a presentation. So my members live and breathe these issues on a daily basis, and we would ask that you keep us in mind for future such discussions. Thank you.

CHAIR STAPLES: Thank you. Please proceed.

MS. ZLOTLOW: Hi. I'm Susan Zlotlow. I come before you now with trepidation, because I already came before you once, and I get to come back before you in a year.

But I wanted to share some observations. They are kind of meta-
observations, and it's a concern that I heard
some people mention something that I'm afraid
will be lost.

A lot of time has been spent talking
about standards at a big picture level, at
statutes, at regulations. But what I haven't
heard at all is the process. Accreditation is
both a status and a process. Recognition by
NACIQI is a status. We want to be recognized,
but it's also a process.

One of the things that's clear is by
the Higher Ed Opportunity Act, there was a
change in not only the composition of NACIQI,
but the role of NACIQI. My concern is when we
look at things like what is the standard, what
is the process and what is change, you all are
focused on the standards level and not the
process level.

I believe that you have an
opportunity to make changes already inherent
in the change in the structure, I haven't
heard you discuss it. One of the things that
Dr. Pepicello was talking about is the granularity of the standards. The reality is if you look at the regulations themselves, they are not that granular, okay.

The statute itself is not that specific. The regulations are a little more specific. What is granular is what has come out of the Department. They have, the staff have had to go to the level of provide a guide that is granular.

In that guide, it even says this is guidance. So the reports you are getting are at a granular level, but I'm not clear that that's the role of NACIQI, to say are you living by the guide, or are you living by the regulations.

I would ask that you as a group talk about your own process now, and that was brought up by a number of speakers, and I don't want it to get lost, okay. Ralph spoke to that, Judith talked to that, and Peter, you all talked to that. But you have, if you're
talking about change, you're talking about providing input to the Secretary, who will take that on advice and provide something to Congress, who will take that on advice.

Regulations, Jamie will go into negotiated rulemaking, and they will take that into advice. So I want you to look again at your charge and your process, and discuss what you can do now, based on the regulations, not on the specifics, to look at some of the things you want to look at.

So I would say it's always interesting, and those of us in accreditationland, as I call it, we know that our commissions love to talk about policy, and program review is just tedious. But that's what happens. If you focus on the details, if you focus on the big picture, you are setting precedent with every meeting, when you go forward with accepting granularity.

Part of the problem we need to understand is the process right now, where if
you go more granular and provide specifics on everything, and everyone is out of compliance, we as accreditors have to pass that along to the agency, for me programs for the institutions we accredit. I would ask that you provide more role modeling and thinking with part of the discretion, we call it professional judgment that we think is important in any kind of quality assurance mechanism.

CHAIR STAPLES: Thank you very much. That was very helpful testimony. At this time, we'll take a brief ten minute break, and then we'll begin our discussions.

(Whereupon, a short recess was taken.)

CHAIR STAPLES: People who are having conversations, I would request that you continue them outside, and the members of the committee please come to the front desk table.

I want to thank everybody for your participation today and your patience, and we
obviously are -- we have an awful lot more of conversation that will occur, I'm sure, this afternoon, some of it in written form and some of it in other forms. But we just want to say to all those who are participating in the audience how much we appreciate you coming and your testimony and your input.

Whether we discuss it in the next stretch of time today or not, please understand, we will continue to talk about these ideas, and we will have future opportunities to try to shape them into a set of model recommendations that we will carry forth.

At this point, I would like to recognize Susan Phillips, to describe a little bit of where we are and what we expect to do the rest of the day.

MS. PHILLIPS: So I have a proposal, given that it's Friday afternoon and I can see the homing pigeon qualities increasing in all of us. I think overall, after a bit more
discussion, this meeting has given some very strong ideas for development of recommendations about where we are.

So what I'd like to do is to spend a bit of time with the last issue that we just heard about, and then wrap up where we are now and promise you some food for thought in written form over the next couple of weeks.

So let me come back to the question of Issue No. 3, Accréditor Scope, Alignment and Accountability, our Issue No. 3 of the three that we have selected. Because you have done so well with my task of addressing the issue of what's working well, what we want to keep, what's getting better and what we want to grow, as well as the opportunities for correction, I thought I would just sort of fast forward and suggest to you what the end of that conversation might look like, and ask you to edit it.

So I'm going to propose that what we might say as a group, and again, feel free to
edit this as we go along, is that the answer to the question of what's working well, on the issue of accreditor scope, alignment and accountability that we want to keep, is that the accreditation self-improvement functions are working well for those with a DNA so inclined, that the leadership of institutions is indeed promoting excellence and creativity, and that regional and specialty accreditation is seen as an indicator of quality. So it's a good quality indicator.

I'd also say that we were, we'd agree that one of the things we're doing well is diverting resources away from improvement and towards data collection that isn't seen as getting us towards improvement. Okay. So that's the list of things that I propose we might conclude that we're doing well.

The list of things that I might propose that we would have as a conclusion for the questions of opportunities for correction, for change, for doing things differently, I'm
going to subdivide into four categories.

One is four gatekeeping functions. There might be a smaller set of threshold standards or proxies that are not common or national, and that are institutionally based.

For the functions of improvement; that there be a provision of peers for that process, however that's defined; that perhaps there would be a provision of benchmarks; that there be opportunities for community learning, however defined; that there be differentiated processes; and that there be opportunities to focus on those who need it most.

For public accountability functions, for the public, simplified but meaningful information about what accreditation means, and for institutions, transparency of the accreditation process itself.

The fourth category of things that could be changed is directions to NACIQI, in which we might raise some questions about our role, both in terms of a policy agenda, a
standing policy agenda, and in the policy that we make in every agency recommendation.

Okay. So that was a half hour of discussion, all wrapped up into one three minute discussion. What would you change, what would you add, what would you delete, what would you suggest?

CHAIR STAPLES: Susan, I apologize if I missed this, because I admit for one second I took my eye off what you said. The issue that I thought that was interesting for us to put on a list to contemplate, whether it's for this process or for the future, is the way in which we might look at modifying the regulatory process to promote innovation, to allow more innovation out there.

In other words, there are -- comments were made, I think they were fairly compelling, that the regulations themselves limit the innovation that we might like to see happen, and that we put on our list at some point the idea of taking a look at what limits
more flexibility, by virtue of the statutes or regulations and might that find a way into our recommendations, that there be an opportunity for waivers or for some other mechanism for innovative work.

MEMBER STUDLEY: Cam, I would only add to that, and to explore whether there are any that exist now that we can take advantage of.

MEMBER WU: Or to put it a different way, some people around the table have said are we willing to consider really bold ideas. Maybe one way to do it is here are really bold ideas, and here are the more incremental ideas, if we're willing to think about the big, bold ideas.

CHAIR STAPLES: Anybody else? Arthur?

MEMBER ROTHKOPF: Yes. I'd just like to maybe throw out an idea that doesn't go to the specific recommendations here. But over the last couple of days, we heard a lot
about data that's collected that's useful, data that's collected that's not useful, and data we might collect.

I think we've all got sort of different ideas about it. But I think there's one resource we might think about going to and getting some advice. While our recommendations are going to, you know, up the line to the Secretary. I think it would be helpful if we could, and maybe it's Susan or some subgroup, get the ideas of the staff who deal with this all the time.

In other words, we spend the first day and a half relying on the staff, and getting their input as to what's happening and not happening and where we ought to take advice or not take advice or, you know, recognize an organization.

But I just think it would be useful to find out from the staff who are sitting around here, what their thoughts are on data, based on their experience, which is quite
extensive, as to what they think is useful or not useful, what could be better.

So I guess I'd just throw that out as an idea that we might aid in our deliberations, particularly on the data side, but even maybe on the process side as well.

CHAIR STAPLES: Any other comments?

We did talk -- Susan, maybe you could mention how we might, there might be an opportunity after today for members to convey more thoughts to you, those who are here and those who have left, so everyone recognizes this is not the last moment to have input on this phase of the process.

MS. PHILLIPS: Absolutely. It being Friday afternoon, I'm not sure if I've done simply a masterful job of capturing all of our points of consensus, or there simply is exhaustion.

In any event, I would welcome more discussion about what's working well and what are the opportunities either you want to
underscore in what I mentioned, or you want to add or subtract.

I'd also offer the opportunity to, you know, as you go on in your next week or so, to jot down comments that have occurred to you, as this, as you slept on this and considered what's been a pretty big banquet of information, what we might want to include in our recommendations.

CHAIR STAPLES: And I think, as Susan mentioned earlier, that she is intending then to turn that around in some sort of a summary fashion again, and we will send that out to the full committee prior to the subcommittee meeting in September, and the full Committee can then weigh in again, make sure by the time the subcommittee meets they've got all the input that came out.

So if there is no other comment right now, I'm sorry. Aron, yes?

MEMBER SHIMELES: I know this was said already, but I just wanted to get the
student perspective on the record. So I just want to say I agree with Jamie and Art, when they were talking about the value of regional accrediting bodies, in forcing diverse institutions to engage with one another, because from my student experience and my undergraduate experience is the most recent of anyone on the board, I'd say that a lot of student frustrations come from the tendency of institutions to over-rely on what their perceived peers to be doing.

I think the extent to which institutions can look beyond their closed circle of pre-determined peers, to look at what other innovative things that other institutions are doing, I think that's a really positive thing.

That isn't to say there isn't value in having institutions of comparable size or stature look to one another for best practices. But I still think there's just a value in those diverse institutions engaging
with one another.

CHAIR STAPLES: Thank you very much for that. If there are no other comments at this time, we will call the meeting to a close, and again, as Susan said, if you could over the next week or so, send any additional comments to her, that would be very helpful with that process. Thank you very much, and have a good trip home.

(Whereupon, at 2:32 p.m., the meeting was adjourned.)