U.S. DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

NATIONAL ADVISORY COMMITTEE ON
INSTITUTIONAL QUALITY AND INTEGRITY
(NACIQI)

MEETING

THURSDAY
JUNE 19, 2014

Holiday Inn Capitol
Columbia Ballroom
550 C Street, S.W.
Washington, D.C
PRESENT
SUSAN D. PHILLIPS, Chair
ARTHUR E. KEISER, Vice Chair
SIMON BOEHME, Student Member
JILL DERBY, Member
ROBERTA DERLIN, Member
JOHN ETCHEMENDY, Member
GEORGE T. FRENCH, Member
ANNE D. NEAL, Member
RICHARD F. O'DONNELL, Member
WILLIAM PEPICELLO, Member
ARTHUR J. ROTHKOPF, Member
CAROLYN WILLIAMS, Member
FRANK H. WU, Member

STAFF PRESENT
CAROL GRIFFITHS, Executive Director
HERMAN BOUNDS, Director, Accreditation
PATRICIA HOWES, Management/Program Analyst
ELIZABETH DAGGETT, Staff Analyst
JENNIFER HONG, Staff Analyst
CHUCK MULA, Staff Analyst
STEVE PORCELLI, Staff Analyst
RACHAEL SHULTZ, Staff Analyst
KAREN DUKE, Records Management
CATHY SHEFFIELD, Staff Assistant

PRESENTERS
ELIZABETH H. SIBOLSKI, Council of Regional Accrediting Commissions
JOSEPH VIBERT, Association of Specialized and Professional Accreditors

THIRD PARTY COMMENTER
BERNARD FRYSHMAN, Association of Advanced Rabbinical and Talmudic Schools
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CHAIR PHILLIPS: So, good morning.

Good morning, all. Thank you for rejoining us this morning, and we'll get under way with our 8:30 agenda start time. I'm Susan Phillips, the Chair of the National Advisory Council on Institutional Quality and Integrity. I welcome you to here.

As we -- is our custom each time we start a day as to agenda, we'd like to introduce each of the individuals around the table. I'll start with myself, Susan Phillips, Provost and Vice President for Academic Affairs at University at Albany. And I'll head to my right.

VICE CHAIR KEISER: I'm Art Keiser, Chancellor of Keiser University in Fort Lauderdale, Florida.

MR. ROTHKOPF: Arthur Rothkopf, President Emeritus, Lafayette College.

DR. DERLIN: Bobby Derlin,
Associate Provost, New Mexico State University.

DR. DERBY: Jill Derby, Consultant with the Association of Governing Boards of Universities and Colleges.

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

MR. O'DONNELL: Rick O'Donnell, Chief Revenue Officer of the Fullbridge Program.

MS. NEAL: Anne Neal, President of the American Council of Trustees and Alumni.

DR. ETCHEMENDY: John Etchemendy, Provost to Stanford University.

DR. WILLIAMS: Carolyn Williams, President Emeritus, Bronx Community College, City University of New York.

DR. PEPICELLO: Bill Pepicello, President, University of Phoenix.

MR. BOEHME: Simon Boehme, former student at Cornell University.
CHAIR PHILLIPS: Graduate of.

MR. BOEHME: Graduate.

(Laughter.)

DR. FRENCH: George French, President of Miles College.

DR. BOUNDS: Herman Bounds, Director of the Accreditation Group.

MS. GRIFFITHS: Good morning, Carol Griffiths, Executive Director for NACIQI.

CHAIR PHILLIPS: Thank you all. A couple of housekeeping items for today, as you know, today is a policy agenda day. We had hoped to have join us the Department staff who works on ethics and recusal. We weren't able to accomplish that, so that will go back on our agenda, and we'll deal with it before next time.

Those of you who have asked me if we have a break this morning so you can go and check out of your hotel rooms, the answer is yes. We expect it to be around 10:00 a.m.

And I'm also asked for members, if you
could take a look in your folder at the December meeting date options. And if you know your calendar and give it - give your notations to Pat before you leave, that would be helpful.

We have a tentative date scheduled, possible for December 11 and 12. That, of course, depends on whether or not you're able to participate. So, if you could take a look at that before you leave.

Okay, so, this morning, we take up again the policy agenda that we began yesterday. As you'll recall, just a quick snapshot of where we were in 2012, this body constructed a set of policy recommendations to the Secretary.

Much has happened since 2012, and we have the opportunity, invited by the Department again, to provide some policy recommendations for the higher education reauthorization.

In constructing that, we've invited ourselves to educate and reeducate ourselves about the issues at play. We had a webinar
earlier this year, and have set for ourselves at this meeting the opportunity to learn from three different perspectives, broadly speaking, in the field: the policy - some policy perspectives, some institutional perspectives, and later on this morning, the accreditation perspectives.

Our tasks in taking up this question of the reauthorization of the Higher Education Act is to consider what might need to be revised, clarified, simplified, or updated from our 2012 report, what might not have been on the table in 2012 that we need to think about now, and also what areas of the role and operation of NACIQI we might have occasion to address that would make us a more effective advocate for advancing quality in higher education.

So, those are our tasks. And as we have invited panelists to speak to us today, we've asked them to address those areas as well to speak to - of what - what of the
recommendations in the 2012 report do they see, what has significantly changed, what needs revising, clarifying, simplifying and updating, what areas not addressed there warrant our attention now, and what areas of NACIQI role and operation could better serve the goal of assuring quality in higher education.

So, just to reframe our activity today, we have today an initial panel of our - of accreditors, specialty and regional accreditors, to speak with us. I believe we do have one public commenter that we'll receive before the break.

And after the break, we'll have time for committee discussion and engagement around beginning to shape what we would like our policy agenda to look like. I'll say a little bit more about what that will look like as we get to that point. That will be after the break.

People have asked me if we anticipate being done before the scheduled 1:15
closing moment, and the answer is, I don't know. So, we'll see when we get there.

Any questions about today, or?

Okay. Let me move to then invite the panel of perspectives of accreditors to join us at the front table.

**PANEL C: PERSPECTIVES OF ACCREDITORS**

This is Joseph Vibert, the Association of Specialized and Professional Accreditors, and Elizabeth Sibolski, the Council of Regional Accrediting Commissions. Thank you and welcome. Thank you for joining us this morning.

Let me give you one more reminder from yesterday, those of you who remember, remember to press your mic to speak, and remember that there are the posture police. Just simply sit upright and speak naturally into the machine. You don't need to lean forward.
Okay, thank you very much. Let's start with the Specialized and Professional Accreditors. We'll start from that corner, and welcome for being here. Thank you.

MR. VIBERT: Good morning, Madam Chair and members of the committee. Thank you for the opportunity to comment on considerations in advancing quality assurance in higher education.

My organization, ASPA, the Association of Specialized and Professional Accreditors, has 61 members, and 33 of those are recognized by the Secretary of Education.

We've identified five principles that we consider important in the development of legislation. Number one, institutions, programs, and accreditors make academic decisions, set standards, and define educational quality.

Number two, student achievement is best determined by institutions, programs, and accreditors, in partnership with communities
of interest.

Third, professional judgment, peer review, and contributions of communities of interest ensure quality in education.

Four, public information about accreditation decisions should serve the public good, and allow for quality improvement in higher education.

And number five, specialized and institutional accreditors serve different purposes.

So, in response to the questions posed in the invitation to participate on this panel, the first one talking about significant changes that have occurred since that report, we agreed with the recommendation in the original report to make statutory and regulatory criteria less intrusive, prescriptive, costly, and granular, while maintaining the essential quality controls of gatekeeping.

The Department though, has
continued to create new regulation through the
negotiated rulemaking process for student
loans, for teacher preparation, for gainful
employment, and for various program integrity
issues including state authorization.

Each set of these new regulations
will add scrutiny and granularity, increasing
burden to higher education programs and
institutions. Added requirements make the
accreditation process more prescriptive and
increase costs, and those costs typically get
passed on to institutions and students.

The second question about revisions
and clarifications or updating to the report,
the report's recommendations for flexibility
and nuance in the review process are already
possible and used to varying degrees by
accreditors, such as multiple decision options
in terms of years of accreditation, and
alternate pathways to accreditation.

Differential review processes
based on perceived potential cause for concern
could be problematic for our programmatic members since it would appear that the judgment of the program's success is made prior to the peer review process.

Typically, no single measure or subset of measures, for that matter, allows for determination of quality. The accreditor must ensure compliance with all standards.

Accreditors do allow flexibility in the manner in which standards are met in order to accommodate innovative and effective program delivery, but the responsibility remains to protect the public health and safety.

The report recommendations that call for consistent and common definitions of data, a one size fits all approach, are of concern, especially when considering the variety of professions and disciplines that ASPA member agencies accredit.

There's a wide range of indicators in information, qualitative and quantitative
data that can be used to provide evidence of quality and student achievement.

Each individual accreditor is best equipped to determine how and what the appropriate quality indicators are for the programs under review based on the discipline intended professional outcomes, as well as the program's missions and goals.

Your third question about new policy recommendations, in the 2012 draft, there was a recommendation that was subsequently removed about either assigning the more risky litigation-prone elements of the gatekeeping function to a different quarter, or providing resources and/or indemnification to accreditors to reduce the legal risk and burden. Perhaps it's time to revisit a policy recommendation in this area.

The committee asked agencies whether or not they have taken an adverse action as an indication that the agency is holding institutions and programs accountable.
Accreditors are at risk of incurring potentially crippling legal expenses when they take adverse actions.

Another issue we have is the sub-regulatory guidelines for meeting recognition requirements. In many cases, the examples provided have become the only way for accreditors to demonstrate compliance as opposed to allowing accreditors various ways to meet those requirements.

To improve consistency, we suggest that the guidelines should be streamlined with clear expectations of what is required for which type of agency, whether programmatic or institutional.

The examples of evidence should be specific to the kind of agency being reviewed, and the opportunity for staff to ask for evidence that is not required should be eliminated.

As well, the accepted evidence for compliance with regulations evolves, and
that's fine. Accreditors evolve in what they accept as evidence of compliance equally.

So, the issue is that accreditors should be advised that changes have occurred, and what's going to be accepted. This can be through Dear Colleague letters or regular updates of the guidelines, so that the accreditors can make changes in adequate time before the recognition process begins.

And finally, the fourth question about the NACIQI's role in operation, we wonder about the recommendation in the report that NACIQI asked accreditors to report on the performance of the universe of institutions and programs they accredit.

Is this yet another requirement on top of the regulations and guidelines imposed by the Department? Is the plan to impose some kind of bright-line indicators to make determinations on the performance of institutions and programs that are reviewed by accreditors?
We affirm that measures of quality and competency for entry-level practice in a given profession is the responsibility of each profession, the specialized and professional accreditor, and the publics they serve, not the Department, not this committee.

Programmatic accreditors look to NACIQI to focus on the review of agencies against established requirements for recognition with the goal of maintaining or improving the quality of education provided by programs in this country.

As mentioned previously, the committee has been asking about the number of adverse actions taken by an accreditor. An alternate question that gets back to quality would be how the accreditor has supported and assisted the program in developing systems that lead to graduates with the necessary competencies to protect public interests and safety.

Many accreditors provide such
guidance and support so that programs do not get into difficulty or even become accredited in the first place. Thanks.

CHAIR PHILLIPS: Thank you very much. Again, we'll hold our questions until the end of the panel presentations. We'll move to Elizabeth Sibolski. Thank you for joining us.

DR. SIBOLSKI: Good morning, Madam Chair and members of NACIQI. My name is Elizabeth Sibolski, and I am here today as the current Chair of the Council of Regional Accrediting Commissions.

As you may know, the Council collectively takes into its purview the seven regional accrediting agencies within six regions of the country. And collectively, we accredit somewhere in the neighborhood of 3,000 institutions across the country.

I also serve as the President of the Middle States Commission on Higher Education. We at CRAC thank you for the opportunity to
speak with you this morning as NACIQI reconsiders the 2012 report, and additional advice that you may wish to give to the Secretary at this point in time.

I appreciate the opportunity to be here with you today. And I must admit that I went back last night and completely rewrote what I was going to say to you today, really trying to pick up on some threads of the conversation from yesterday.

So, what you hear from me will be a more informal, more conversational tone, not perhaps quite as structured as some of the other presentations that you've heard today and yesterday.

CRAC provided comment during the original drafting of the 2012 report, and we've also provided written comment during the current period. What we said in 2012 is still relevant today, and so I'm going to give you just a little bit of a precis of the general summary comment that was given at that point in
We continue to support several of the ideas such as those dealing with improved communication among the Triad, and the need to improve data collection as utilization as it relates to quality assurance.

However – there had to be a however, didn’t there B one overarching concern is that the proposals taken together would represent a significant expansion of current law regarding program integrity.

This expansion would, in turn, result in more federal regulations and an even greater number of new federal mandates for states and accreditors, as well as institutions. So, that was said two years ago, and I think it’s still relevant today.

The last two years in higher education have not been easy ones, and they have not been easy years for regional accrediting agencies either. The pace of change in higher education and in individual institutions seems
to ratchet up every single year.

We try to cope with those changes. We try to accommodate innovation responsibly, while assuring that appropriate levels of quality are maintained. It isn't always easy to do that.

For example, we want to, and are trying to facilitate competency-based education programs at our institutions. But, current practices relating to direct assessment programs are ambiguous and confusing.

Approvals are required by both accrediting agencies and the Department, but we are not always on the same page, leaving the institutions somewhere stuck in the middle. That is not a good thing, and that's certainly one area that we probably ought to revisit as new since 2012.

Regional accreditors are also actively trying to address criticism. The move toward common language is an example of
this, as is the ongoing experimentation with methods of transparency in process and reporting.

In both cases, we are trying to find a responsible and reliable path forward that responds to the call for change without the need for additional regulatory intervention.

A number of comments yesterday addressed the need to step back and take a look at the regulatory burden on accrediting agencies and on our institutions. We would wholeheartedly agree with that concept and that idea.

Most regional accrediting agencies are coping with hundreds, and in one case, thousands of substantive change requests a year, and that is one area where I would suggest that we might want to take another look at the regulations.

Some of the substantive change requests are for very simple things that may not be at all directly related to educational
quality, such as a change of address for an additional location that can be simply as close as across the street or one building down the street. That does seem to be above and beyond what we should be asked to do.

There is also a pull in many of the requests that come to us to be dealing with things that are more programmatic in nature, although we are institutional accreditors. And we, at times, are very uncomfortable about that pull toward programmatic review.

Also related to regulatory reform, I should note that we are encouraged by the initial statements about reduced reporting requirements for the recognition petitions, and we anxiously await developments as they will unfold next year.

There have also been calls for more flexibility in the accreditation process. Terry Hartle mentioned that accreditors are unsure what latitude we have, particularly as related to recommendations nine and ten in the
NACIQI report. He's right about that, and we do need greater clarity about what's allowable and what's not.

But I should add that in some ways, the regional accreditors already do vary our processes, and we do that through the use of follow-up reporting as we move through the regular review process with our institutions.

Institutions that are in fine shape generally don't get asked for follow-up reports from the commissions.

On the other hand, where institutions have problems with meeting our standards for accreditation, we're much more likely today than we were even five years ago, to ask for a follow-up report in a variety of types, sizes and shapes, from perhaps a progress report to something that is much more serious in terms of focused special visits.

Conversation over the past 24 hours has also focused on the need to address some really big-picture issues. One example is the
challenge that NACIQI accreditors and others in the community should think more and more deeply about the meaning of quality in higher education.

Another example might be for members of the Triad to focus on clarifying independent and collective roles. To date, we have not found the venue for such discussions, and perhaps NACIQI could play a role in that.

If we could find the right venue, and have the right kind of conversation, perhaps we would have a chance to better explain ourselves to the public in a way that they can understand, and that certainly was a need that was expressed yesterday by the Deputy Undersecretary, and one, again, that the regional accreditors would wholeheartedly agree with, and then one that we would be very happy to participate in, in some way, to try to form that discussion and move forward with it.

Another big picture issue that has more urgency now than it did two years ago
relates to the place of big data in what we do.

Yesterday, there was talk about the ratings system, about a variety of other data collection and reporting tools that are relatively new, and even about student unit records.

The latter is perhaps a question that will best be left to the politicians. I think that is certainly where the discussion point is going to be.

But, generally speaking, better data will facilitate the kind of study and discussion that will help us in improving higher education and assuring quality.

It's the details that we need to be concerned with in this matter. What data? Collected how? And perhaps most important, how do we keep the mere presence of, and ability to, collect data from overshadowing the meaning and context?

A set of metrics alone can't assure quality in higher education, another point that
I think the Deputy Undersecretary made very well yesterday.

And finally, I want to just add a personal note here. I was very intrigued with the idea expressed by Cam Staples yesterday that perhaps the accreditor recognition process should look a bit more like the institutional self-study process.

To get at this, we might use a two-step method of working on those concepts. One might deal with required evidence of compliance with a limited number of federal criteria for recognition. And a second step might deal with self-study focusing on quality assurance aspects of agency accreditation.

I think this might be important because it has felt to some of us as though the process that we use right now is far too heavily balanced toward discussing process rather than what's at the base of what we do as accreditors.

And I think with that, I'm going to call a halt, and perhaps now it's time for some
Q&A.

CHAIR PHILLIPS: Thank you very much. Committee members, questions? I have Art. Art, go ahead.

VICE CHAIR KEISER: Well, it's nice seeing both of you sitting next to each other, which is kind of leading to my question. One of the things that has changed in the last couple of years has been an almost - this constant drum beat of cost of higher education.

And I know at my institution, which has a regional accreditor and 23 specialized accreditors, that the cost doesn't seem to be going down any very soon in terms of my accreditation expenses, and the expenses of our - of the different teams coming in to visit with us, which seem to be on a weekly basis.

The question I have is what's the possibility of coordination between the specialized accreditors and the institutional accreditors, to where I have maybe, instead of one visit a week or a month, you know, one a
couple - you know, a couple of my programmatic
joining in my regional accrediting visit to
focus on the institution as a whole, yet at the
same time focusing in on the programs, which I
think would enhance the process for both
specialized and institutional accreditors
seeing it in total?

DR. SIBOLSKI: Why don't I take a
crack at this first? And I'm going to speak
here from my experience as the President of the
Middle States Commission on Higher Education.
For a number of years, we tried to do exactly
that.

And in, I think, one rather
notorious case in our history, one of our SUNY
institutions decided that it wanted to have
three reviews done at the same time, one for the
Middle States Institutional Review, and two for
very large and powerful specialized
accreditors. So, the self-studies were done.
The teams were put together.

It ended up being what that
institution described to us as being the sort of experience they would never want to repeat again: too many people on campus at the same time, too many complex requests for additional information, too many conflicting ideas and issues with where people needed to be and what they needed to be doing.

There is another problem that has cropped up with regard to this in more recent history for Middle States, and that is questions that have been raised about institutional accreditors and other accreditors needing to make wholly separate and independent decisions.

So, while we had tried to do cooperative collaborative visits with some of the specialized accreditors, that meant teams that would be composed of members from some of the - some members from the specialized accreditors, some members from our area.

At the end of the day, the question raised from the Department, and it was an
interesting one to think about, is whether the members of the team who represented the other accreditor knew your standards well enough to pass a judgment on whether the institution was meeting both sets of standards.

I hope that wasn't too confusing. But - so, we tried. And although we're still trying to do collaborative visits, they're not the ones that happen together and with a unique single team, an idea to go back to though.

VICE CHAIR KEISER: Yes, well, I'd love to continue the discussion, but, go ahead.

MR. VIBERT: I would echo the only anecdotes that I've heard about collaborative visits were essentially nightmares for the institutions and programs.

I think the opportunity expressed in the report to be a convening body to have discussions and conversations about things like eliminating duplicative requests for information, and looking at where it's possible in statute and regulation to allow the
different kinds of accreditors to work more closely together and rely on each other's judgment is definitely an area for exploration.

VICE CHAIR KEISER: Yes, because what I heard is what we can't do, and again, what we're looking to do is what we should be doing. And it's not - it is, from an institutional perspective, it's crazy for us to have as many visits and as many differing viewpoints, where if we could align the specialized and the institutional accreditors in a way where they're complementary, not contradictory or competitive, it would make a whole lot of sense, both to the consumer, both to the industries that you folks are representing, and then most importantly, to the institutions that are trying to keep costs under control.

CHAIR PHILLIPS: I have Frank, Bobby and Arthur.

DR. WU: So, to some extent, your agencies are a means to an end. What I mean by that is our goal is to improve higher education.
You're the way that we try to do that. And so, we regulate you in order for you in turn to do that to the schools that you visit.

My question is this, how much flexibility do your agencies feel you have in the current system? Do you feel that everything you do is dictated by the Department and our processes, or do you feel that you have sufficient room to do things differently so that it would ultimately improve higher education? How constrained are you by us?

MR. VIBERT: I think a majority of our members feel that if a program can demonstrate its meeting compliance with their standards, then it sort of doesn't matter how they do it as long as it goes back to public safety and protection.

There is one example that I'm aware of in terms of the competency-based programs that are going on. And apparently, the law states that it's going to be 100 percent competency-based. There can be no blending
involved if the program is going to be eligible for the Title IV funding.

I may not be stating that exactly how it is, but one of my members is having a big difficulty like that because - with that concept, because they have programs that blend competency and the other kind of education, and it sort of makes no sense that it has to be one or the other to provide access to the funding.

DR. SIBOLSKI: I would echo what Joseph has just said. That certainly has been our experience too. And so, this, I think, goes back to what Terry Hartle was saying yesterday about there being some areas where accrediting agencies are not confident that we understand what we can do and what we can't do, where we do have flexibility and where we don't.

And I think this is maybe one of the areas where NACIQI could productively think about what the policies really ought to be going forward.

In terms of flexibility, it's more
than just what we’ve mentioned so far from this side of the table. It’s also issues like what we might be able to do with changing the rate at which we revisit institutions, the type of reviews that we might do with different kinds of institutions.

One of the ideas that I think is most intriguing to me is the thought of risk-based accreditation, and how that might play out if we consider what are the factors for risk and try to concentrate our resources on the institutions that appear to need more attention through that kind of a facility. But, I don’t believe there’s a way to do that right now.

DR. WU: So, if I may follow up with two more questions, would the following statement be one that you think is true and useful to make, that the accrediting authorities feel constrained by the Department and NACIQI, and that you feel that you are doing things that aren’t useful, or being prevented from doing things that would be useful?
Does that capture the sentiment that the Department and NACIQI are causing you to behave in ways that are not productive for society and for higher ed? That's the first question.

The second question is, in which direction? Is it that we're making you do too many things such as looking at fire codes, or that we're preventing you from being more creative? Is it that we've added a set of burdens, or we've restricted your movement?

DR. SIBOLSKI: I think that the answer to your original question is yes, that most of us do feel constrained. And the question about why is a little bit more complex, I think.

But, I wonder if part of it isn't that regulatory behavior has a tendency to be reflective of what has happened in the past, distant past, recent past. But, it doesn't deal so well with where we are today in higher education, or where we may need to go into the
future.

And so, some of those questions about what's quality in higher education today may help us figure out the answer to some of the questions about where we need to go.

MR. VIBERT: With the development of the sub-regulatory guidance, that just is more and more restrictive, and it narrows down the availability of experimentation or new ways of doing things by the accreditors.

The move by the Department to the focused review with the 25 criteria as opposed to the 95, I think Dr. Sibolski suggested some optimism about that. I don't know if we necessarily share that, because accreditors will still be held to the other 70 criteria.

And it's sort of hard to imagine how, you know, providing documentation for the first 25 prevents having the documentation ready to go for the other in case an issue arises.

CHAIR PHILLIPS: I've got Bobby and
Arthur. Microphone please.

DR. DERLIN: Sorry, this is Bobby.

Yesterday we heard some varying impressions about the degree to which accreditors reflect appropriate review of student achievement, and student performance, and student learning outcomes in their standards, and in their reviews.

And I'm wondering if each of you could comment a bit on how you feel the state of the nation is, so to speak, in terms of adequate review of student achievement in accreditation reviews and standards.

MR. VIBERT: We can always do a better job about explaining what we do and making it more user friendly to the consumer of the information. There is no question about that. But specialized and professional accreditors are all about competency-based standards.

I can't say 100 percent, but the majority of them definitely that's how their
standards are based because the ultimate goal is to have a graduate of a program that can go into society and work in a profession competently, safely.

You want to make sure the building you're in isn't going to fall down on you. You want to make sure that the dentist you go to is going to do the right thing by your teeth.

So, I think the outcomes, at least from my members, they're - I don't see - the criticism to me would only that the explanation isn't out there enough to demonstrate what is being achieved.

DR. SIBOLSKI: A couple comments, I guess. First of all, CRAC met earlier this year with the National - the folks from the National Institute on Learning Outcomes Assessment, NILOA, and they did publish an updated report on the work toward outcomes assessment in the U.S. earlier this year.

I think one of the statements made in that report is that accreditation continues
to be one of the places most responsible for the
work that has been done in institutions with
regard to learning outcomes assessment. So,
that's sort of a general kind of a statement.

More specific to what happens in my
agency and region, I know that we are paying an
incredible amount of attention to that. We
have over recent years B in fact, the earliest
statements about learning outcomes that we
could find in the Middle States history went
back to 1953.

So, we've actually been working on
this for half a century, kind of scary. But,
are we there yet? I don't think this is an area
where we're ever really going to be there.
It's going to continue to evolve. We're going
to have to continue to work on it.

Right now, one of the debates, I
think, is what is it that we really ought to be
aiming for. Ten years ago, when we really
started to focus in on this, we were looking for
institutions to be able to tell us they at least
had plans for doing student learning outcomes assessment.

Now, we want to know more about statements of what expected learning is that appear in syllabi. We also want to know more about, not just the plans, but what is coming out of the outcomes assessment process, and how it is being used to improve curricula and student learning experiences throughout the institution.

We also want to know how that's tied into institutional assessment. And so, it's really more about the use of the results now, not about just plans.

We continue to experience reviews where a lot of the follow-up that we ask for is in the area of student learning assessment. I think that's probably true for most of the other regional accreditors as well, although I haven't done a study to really find out whether that's true or not.

DR. DERLIN: Thank you.
CHAIR PHILLIPS: Thank you very much. Arthur?

MR. ROTHKOPF: Yes, thank you for these, I think, two excellent presentations. We've heard a great deal yesterday and then today about the onerous effect of the federal government on what you're doing, and I think you've indicated that it, at the very least, complicates your task, makes it more difficult and is really in many ways not helpful.

Assuming all of that, do you think you'd do a better job if you were not gatekeepers and subject to these restraints, and regulations, and rules imposed by the federal government? Would you do a better job for the institutions and the students if you didn't have that responsibility?

MR. VIBERT: I don't know that it's necessarily doing a better job, because I think accreditors are about the quality. There - accreditors tend to hire more staff to meet the requirements that are imposed on them. So, I
think accreditors will do a good job regardless of whatever additional requirements are imposed.

DR. SIBOLSKI: I think you're pointing to one of the tensions that does exist in the regional accreditation community. I'm sure that's true for the nationals and also for the specialized.

And that tension is between our original purposes of improvement in colleges and universities, and the compliance issues that have been added on top of that.

And sometimes it does feel as though we're being turned into the accreditation police, and don't have enough time to devote to some of the bigger questions. That might result in different kinds of emphasis.

But, there are a lot of open questions, I think, about what would happen in a decoupling situation. Would institutions continue to voluntarily work with regional accreditors? I don't know the answer to that.
And there's a risk involved if that wasn't true.

And to sort of turn this question a little bit, I think that the Deputy Undersecretary yesterday sort of highlighted the need for there to be a meaning to degrees, and that really speaks toward the need to speak to quality in higher education, which is really what we try to do through institutional improvement.

I don't know where we'd go if that's not part of the process, but certainly some of those decisions need to be talked about a bit more.

MR. ROTHKOPF: This is a separate question addressed to Middle States. At the hearings we've had before we issued the 2012 report, one of the more graphic pieces of testimony received was from Shirley Tilghman of Princeton, and she talked about the difficulties of their process, and the costs of it, and what she felt was the inappropriateness of it.
I'm not so much concerned about responding to her point, but the point she made, and AAU has made, and some of the other research universities, is that really they are different animals than some of the other schools you look at, and they ought to be separated out into a sector group that includes, maybe not just the AAU members, but other maybe AAU would-bes, and have an accrediting process for those kinds of institutions.

And maybe that ought to spread elsewhere. Maybe you ought to have a community college accrediting body, and others that look at the particular characteristics of the institutions.

I guess I'd be interested particularly in your comments, because those institutions tend to be part of the CRAC universe.

DR. SIBOLSKI: So, let me first make a comment about that set of hearings in 2012. I'm only going to speak for myself, but
I think it's true also for some of the other regionals, it was a wake-up call, and a wake-up call that we had not been adequately communicating with some of the other associations and with the different types of institutions that comprise our membership.

We've changed a good deal in the way that we do business. About a year or 18 months ago, we started to work with the AAU group to try to come up with a set of principles on student learning outcomes.

And so, that was another example of collaboration that I think speaks to where we need to go in the future more than we have in the past.

Then, in terms of sector-based accreditation, I said in my earlier remarks that the idea that really is more intriguing to me is risk-based, and that if we could figure out what those risks are, and apply them evenhandedly, you could still then use the same set of standards for all of our institutions.
that are accredited by each agency, but apply
them in slightly different ways based on
history and prospects for the future. So,
that's kind of where I'd like to see the
discussion go on that one.

MR. ROTHKOPF: Thank you.

CHAIR PHILLIPS: I have George and
John.

DR. FRENCH: Thank you. Good
morning. Thank you again, colleagues, for
your presentation. My question is really a
follow-up also with Art's question, Dr.
Sibolski.

You spoke of risk-based
accreditation. Where are we in the
conversation amongst the regional accreditors?
Is there consensus among the accreditors that
this is something that we really want to delve
into, and are we really looking at that?

And the second question could be for
either of you following up on yesterday's
conversation about the administrative - the
administration's proposed score card. Are you all involved in that conversation? Have you been invited to the table to get your perspectives on that proposal?

DR. SIBOLSKI: Okay, first of all, relative to the risk-based question, it's out there. It's not at a level of really trying to figure out what the risks might be, what the evaluative functions might be.

And I'm not sure that it should be done strictly within CRAC. I think that's a wider conversation that would need to take place so that we understand from the perspective of our institutions.

And again, we are - we still continue to be membership-based organizations, where what we do depends on member votes. So, the conversation needs to be a wider one. It's a policy sort of set of questions.

I would hope that we begin to do some of those kinds of things, but certainly CRAC has been working on a few other issues like the
common language and the statement that we worked out with AAU.

We are a much more active and involved organization than we were a few years ago, and I think the push and some of the criticisms have led us to be that way. And I actually think that that's a good outcome from what may have been seen as some rather negative kinds of pushes that have made us do some of those things.

So, it's there. It's on the agenda. Where it stands on that agenda, I think, is a matter for, perhaps, some additional public conversation. Do you want to tackle the second question?

MR. VIBERT: We weren't necessarily invited to the table to talk about the ratings system, but there was an opportunity to provide commentary. And our membership are very uncomfortable with the idea of a ratings system, at least based on how it was originally presented.
There is such a diversity among the professions, and a diversity in how long it takes to get a degree, the reasons that people choose to go to school. So, things like graduation rates may or may not mean something.

Earning potential, you know, you have a graduate going to work in a poor economic situation isn't going to make as much money as a graduate going into, you know, a larger city. How do you make that comparison there? It's still somebody who's contributing to society, but not making a whole lot of money doing it.

And employment rates as well, as a potential indicator, there may be no jobs in the particular sector that this student has studied. So, we're - I guess we're going to wait and see.

DR. SIBOLSKI: And for us, I think, we are really in the camp of being opposed to it. And it really is about the statistics, and what's available, and how they get used, some of the things that I said originally in my
comments.

We don't - we know that there are problems in the IPEDS data collections. And although I know that there are some conversations that are ongoing now about where else data may reside that can be used for this purpose, I think that trying to put a ratings system in place is premature until we know that we've got data that will really tell us something, and that will be helpful to the public.

The other thing that is a bit concerning to me is the proliferation of data systems that are out there right now, everything from the voluntary framework for assessment that is in the community college sector, the voluntary system accountability, the SAM system, the scorecard, the navigator system, and that's just mentioning the ones that I can think of off the top of my head.

If there's all of that out there, how does a consumer, how do families know where
to go? And certainly with all of that out there, the potential for conflicting information is pretty high.

CHAIR PHILLIPS: Thank you. John?

DR. ETCHEMENDY: Yes, I'd like to hear your thoughts on something that came up yesterday, and actually has come up in various different ways, I think. And that is -- let me start with an analogy.

You know, the IRS introduced a notion of intermediate sanctions because it -- basically, to pull an organization's nonprofit status with such a nuclear option that it was kind of impossible to do.

And so, they introduced a system whereby you can impose fines of certain sorts for certain kinds of behavior.

And I'm wondering if there is a need for something like intermediate sanctions, because it is so hard to yank accreditation from an institution, just like it's hard for NACIQI to yank recognition from an accreditation
organization. It's such a major step and can be so devastating for the institution, for students, and so forth and so on.

And I was very interested yesterday in the fellow from the -- Ben Miller from whatever foundation he was from. He had suggested a few ideas that struck me as quite interesting.

In particular -- I mean, I realize that with accreditation you can have different levels of warning, but different levels of warning, the only actual sanction there is that the institution has to get visited again, and, you know, has to go through the pain and suffering of reaccreditation.

And, you know, so that is something that institutions want to avoid, but it's not really a sanction that they necessarily need to pay attention to.

So, the suggestion was that we create tiers of eligibility for financial aid so that it is not necessarily just yanking --
all of a sudden yanking access to Title IV
funding, but perhaps putting some more of the
risk on an institution that is problematic, or
to a new institution.

One of the suggestions was you
shouldn't immediately have full access to Tier
IV eligibility. If you're a new institution,
you should get some kind of access to funds, but
they would be risk-based or
reimbursement-based.

I'm curious if that idea appeals at
all to you, or is it something that you think
would just make your lives more difficult?

DR. SIBOLSKI: I certainly think
that it would complicate, because what we do
pretty much right now is, in some senses,
binary. You're either accredited or you're
not, with some gradations of the, "If you're
accredited, what do you have to do to keep on
the track toward continued good standing?"

But, I guess what occurs to me as
you're asking the question is that it would only
be possible to do that under a situation where the accreditors and the Department were working hand in hand, I think, where there would be reliance on the accreditor to make some judgments about the quality standards, and then the Department's work on financial capability of the institution probably would also have to come into play.

That speaks to a sort of a trust relationship in working together that I don't really think exists right now. It would be nice if it did. And I think that collectively we might be able to make better decisions about where we go with our institutions.

I think it might possibly be pretty threatening too, to some of the institutions that are perhaps more likely to be on the bottom tier of what we do.

DR. ETCHEMENDY: Do you mean trust between the accreditor and -- trust between what parties?

DR. SIBOLSKI: Well, I think
actually probably the accreditor, the Department, and even NACIQI, because what you're really saying here is that the collective wisdom of the people who need to act, the issues about educational quality, would then need to come into play with the enforcement capability of the Department. And I think in order to do that, you've got to have a better trust relationship set up than exists right now.

CHAIR PHILLIPS: Bobby? Thank you. Mic please.

DR. DERLIN: This is Bobby. Thank you. Part of this discussion relates to challenges that the current process presents to you as accreditors, as well as to us as a committee.

There's also this concept of sort of tiered recognition and how that might fit that John was just raising. We've also had some discussion about the million-dollar self-study process and the costs of accreditation to our
institutions.

And one of you, at least, raised today that this process of information gathering presents challenges in terms of really letting us know about where we are today in accreditation.

And my perception is that a number of the regional, as well as other accreditors, have taken actions, maybe not to tier the outcome so much in the way John is suggesting, but to revise and revisit the self-study process to make it a more cost-effective proposition for institutions, and also a more focused activity on really important quality issues.

And I don't believe we've gotten a good impression yet, or at least I don't feel I have gotten a good impression yet, of where the accreditors are today in making those kinds of improvements for institutions, and I'm wondering if you could comment on that.

DR. SIBOLSKI: I'd be glad to.
You're right, that we are trying to change and improve our processes as we move along.

And I think in recent years many of the regional accreditors have moved into a sort of a bifurcated system, or at least the possibility of that, where at one stage in the process we're looking at compliance with required federal regulations, and then asking an institution to do something that is an improvement study.

Some of the institutions -- some of the regional accreditors do that very explicitly. In the Middle States region, what we do is to allow an institution to make a decision to do a selected topics kind of a review if that is suitable and if the institution is in good standing.

So, yes, we recognize that the whole process of self-study is pretty darn expensive. It has to involve opportunity costs for the institution too, because of the amount of time that needs to be put into these things.
But, if you can allow an institution
to pick topics that will help it move forward,
then we've had very good success with
institutions feeling as though that process has
actually been useful to the institution moving
forward.

DR. ETCHEMENDY: Could I add a
comment on that? So, this is John Etchemendy.
I just participated in a special topics review
of an institution in Middle States, and I was
so impressed by the process, and thought that
it was very value -- it was easier for the
visiting team, and it was much more valuable for
the institution, and I would like to see that
idea spread to some of the other regionals.

MR. VIBERT: In our association, we
constantly talk about improving processes,
improving quality and efficiencies.

And a lot of our members are looking
at an electronic data submission, looking at
improving consistency, and also making the
lives easier of the programs participating in
the review process, things like looking at the size of the site team and making sure that that's efficiently chosen, and reducing costs as possible -- as much as possible to the receiving programs.

So, I guess that's part of the reason that I like being in this business is because the accreditors who are charged with making sure the programs and institutions are -- demonstrate quality, the accreditors are also concerned with their own quality.

CHAIR PHILLIPS: Just -- I'm not sure if the entire NACIQI is familiar with this -- the focused review process and its relation to the compliance process. If you could just say a little bit more about that, that would be helpful.

DR. SIBOLSKI: I'm going to speak from the Middle States' point of view again. And in the case of the review that John was mentioning just a minute ago, the institution had requested that we deal with the compliance
issues of what we would normally do in a separate process, and that we would look at compliance with all 14 of our standards ahead of time so that the focused review could then be about the topic that the institution felt would be of benefit to it, and that would demonstrate the kind of quality that exists in the institution, and that would allow the institution to ask questions of itself that would further the development of quality in that particular area. Is that kind of getting at what you were thinking about?

CHAIR PHILLIPS: Yes, thank you.

Other committee questions? Anything else before we move on? Okay, thank you very much for joining us. We very much appreciate your perspectives and preparation.

THIRD PARTY COMMENT:

I believe we have one, just one public commenter today, and that is Bernie Fryshman. We invite you to join us at the table. Greetings, and welcome.
DR. FRYSHMAN: Thank you. I thought that I would be adding some unique perspective, and then I listened to Elizabeth and Joseph, and I said, "Me too," to a lot of the areas.

But, I think there are a few areas which I can contribute to, if not from the perspective of a person who's been in accreditation for 40 years, from a perspective of a faculty member who's been teaching for 52 years. So, there may be something that might be useful in my comments.

I'll start out by looking at some of the recommendations, the precise recommendations, that you issued in 2012, and make some comments there. And then I'll just step aside and give some additional insights if I may.

Recommendation five speaks about drawing the convenient capacity and function at the federal level to develop methods for Triad articulation and, "promote greater engagement
and consistency across states."

This is something that's been troubling me for a very long time. It's getting worse. And basically, I feel that it is not the role of the United States Department of Education to, "promote greater engagement and consistency across states."

Increasingly, there is a ministry mindset which is being established in the Department of Education, in which the Department of Education is not necessarily serving education, but wants to guide it, and I think that has to be on the minds of everyone at NACIQI in making their recommendations and interacting with the government. Government in itself should not be guiding education in America.

Recommendation number six speaks about evaluating whether the diversity of state regulation across the country might be shaped to incorporate recognition and so forth. My comment is that the diversity of state regulation is consistent with a healthy
Each state is the best judge of its educational needs, and the guidelines under which institutions should function. We should protect this diversity.

We should not encourage, in my opinion, this move towards commonality and uniformity, which again, feeds the idea that there is a national system of education. Our diversity is integral to our independence and to the health of American higher education.

Recommendation number 15 speaks about appropriate metrics, and of course, that opens the entire question of gathering data, measuring quality, in terms of numbers, measurable outcomes, metrics, which basically has diverted accreditors from their focus on peer review and distorted our interaction with schools.

You've said some of that, but I'm afraid that you've heard many, many examples of graduation rates, and career outcomes, and
jobs, and income. That has nothing to do with learning. That has to do with career. That has to do with life.

But, that has nothing to do with the fact that there is a transformation that is supposed to take place, that does take place in higher education.

Students learn to think. They learn to interact. They learn to -- they learn to listen to other peoples' opinions. They learn to participate in class, challenge instructors, challenge each other.

The litany of outcomes in higher education are vast, and we've just compressed them into small, little tokens of accomplishment of some kind. The truth is, of course, that what happens in a classroom rarely relates to the ultimate careers.

I would just remind you, I certainly could remind myself, that the courses, the majors that you were all engaged in, that we were all engaged in, in high school, probably
has very little to do with what we're doing now.

We were there to learn. We learned to think. We learned to interact. Our outcomes were not measurable and they weren't measured. They were assessed. There was peer review.

I speak for myself, because I've been in --

(Bell chimes)

B- since 1973. The interaction between the accreditor and NACIQI, or the National Advisory Committee on which I sat at the time, was to sort of thing that Cameron Staples was speaking of yesterday.

There was a conversation. People asked me about learning. We talked about -- in my petition, I talked about how we make sure that schools which claim to have a mission of scholarship, how they train students to focus on originality, and innovation, and creativity, deep meaning.

Those are the things that we talked
about that used to be integral to the entire program, the entire process of recognition. Recognition wasn't a challenge. It wasn't -- it was an invitation to show what we're doing.

The accreditor was, to a very great extent, interacting with the committee in the same way that we ask our schools to interact with us. And I strongly urge you to take Cameron Staples' recommendation seriously. That's a very constructive thing that you could be doing.

I'm just trying to see where I can cut down on the --

CHAIR PHILLIPS: Let me ask you to wrap up in just a couple minutes, please.

DR. FRYSHMAN: Okay.

CHAIR PHILLIPS: Thank you.

DR. FRYSHMAN: The gathering of data has become an end in itself. It's a burden that produces very little policy, if anything, very little contribution to teaching and learning. You can't show me anything that's
come out of -- concrete that's in use anywhere after 30 years of gathering data.

We gather data almost mindlessly, and the Higher Education Act will have recommendations that we need more data. And the question is, what are we going with the trillions of data elements lying in state warehouses, more data than you can ever assess or deal with?

And people are picking up ideas from big data, forgetting that we're not talking about items which are uniform, we're talking about human beings, each one of whom is different. And so, gathering data does very, very little for explaining, enhancing, and improving the teaching/learning system.

So, I believe that's got to be restricted. Certainly, if there's any further requests of Congress, there has to be experimentation.

There has to be demonstration.

There has to be some indication that the
gathering of data makes sense, does something. And if not, why the burden? Why the diversion? Why the effort?

Student achievement assessment data says nothing about the student, and it says nothing about the program.

CHAIR PHILLIPS: Thank you, Bernie. I want to invite committee members to pose questions or comments concerning Bernie Fryshman's testimony.

DR. FRYSHMAN: Convinced everybody, did I?

(Laughter)

CHAIR PHILLIPS: Thank you very much for your comments.

COMMITTEE DISCUSSION

CHAIR PHILLIPS: So, committee,
you've heard -- you've had some briefings on the current state of higher education.

You've learned about the policy -- some of the policy perspectives, the institutional perspectives, the accreditor perspectives. You've heard a fair amount over the last 48 hours.

And our opportunity next is to begin to share a bit about how we're reacting, thinking about what we've heard, where we think going forward. We are almost at 10:00, and what I would like to do is offer you the opportunity to check out and do what you need to do with a break.

But, while you are doing that, to consider the following categories about which I'd like to have some structured conversation when we come back.

The first category, this will sound familiar, is what is it that you think needs, from our 2012 report, that needs revising, clarifying, simplifying, or updating?
The second is what areas were not in that, that need addressing now? And the third is what are the areas of NACIQI's role and function that could be better -- could better serve the goal of quality assurance?

So, your task over the next -- and I'm going to make it a 20 minute break so you can think and migrate at the same time -- is ask you to come back with some initial thoughts on those three questions.

We're going to talk about each of those three questions. I realize that they don't always tidy themselves into that bucket. And then after we've done some initial sharing and conversation, take an assessment of where we are as a group to determine where we might go next to develop it further.

So, three questions, a 20-minute break. I expect you back at 10 minutes after 10, and we'll take up the next step, all right?

Thank you.

(Whereupon, the above-entitled
matter went off the record at 9:50 a.m. and
resumed at 10:17 a.m.)

CHAIR PHILLIPS: Thank you, and
welcome back. So, committee, our task for the
next period of time is to share some of our
thoughts about what we'd like to see in our
recommendation agenda. I don't expect that by
the end of today we will have recommendations.

Really, what I'm trying to capture
is what the recommendation areas ought to be
that we can then develop more fully.
Obviously, not all of us are here today, and so,
we want to make sure that we share the
opportunities with all of the people who are on
the committee.

So, what I want to start with is an
open conversation about those three areas.
You're free to advocate, to ask questions, to
disagree, to agree, whatever you choose. Jill
has a question already, yes?

DR. DERBY: Well, it's not a
question, it's a comment -
CHAIR PHILLIPS: Okay.

DR. DERBY: -- if you're ready for comments.

CHAIR PHILLIPS: Hold on. So, we're going to take -- I'm going to take them up in the sequence. The first is the what do we need to revise, clarify, simplify or update about the 2012? Which, of course, you have multiple copies of, one in your blue folder. We'll start with that one and see where that gets us. We'll take up the next one, and then take up the last one, see where we are as a group. Who knows? We may -- this might be very quick and very clear, or it might not.

So, let's start with what needs revising, clarifying, simplifying, updating from the 2012. Jill was up first, then I have Bill.

DR. DERBY: My comment is to the last one.

CHAIR PHILLIPS: The last one, okay. In which case, Bill, you're first.
DR. PEPICELLO: All right, thank you very much. My comments go to probably structure as much as substance in looking at any kind of revision, and that is that our original report presents itself sort of in silos. You know, there are the several areas that we said we would look at.

And what I would suggest as a way of revising perhaps, especially in light of the discussions that we have heard over the last two days, is a more matrixed approach. And let me give you an example of what I mean by that.

One of the issues that has come up several times, and it did also this morning, is the issue of common language, which cuts across many of the areas in our report.

And certainly what Art Keiser brought up this morning as far as having to suffer the slings and arrows of many reviews has to do with the fact that many of the agencies -- I'm just going to guess at this, Art -- that come to visit you, define various areas
differently, assessment, for instance, being one.

And so, I think that if we looked at common language as a way of helping to ensure consistency, we could look at that then as applicable to how we help provide some consistency across states and agencies, and align that with the federal perspective.

I'm not suggesting that there has to be, you know, a one-for-one correspondence, but certainly I think that we could look at a common base of definitions across all of the sectors and still allow room for diversity. I mean, it's certainly that -- I think there's a role there.

I think common language also goes to the issue of data collection, where we were concerned with consistency and accuracy of data collection.

But, I don't think that the accuracy of data collection can be addressed unless there is some agreed upon set of definitions of
what the data is, so that if we collect it for
one purpose, it's in a database that then will
serve multiple purposes.

So, I think it would not be terribly
difficult to have a matrix that says, okay, one
of these issues cuts across all of the other
silos here.

And then a one-off is also -- we
talked about making IPEDS more useful. And I
think I would suggest that we want to revise
that to replacing IPEDS with a workable model.
I mean, that certainly has become an even more
hot button since we put out the original report,
and I think that would bear some additional
scrutiny.

CHAIR PHILLIPS: Thank you.

Others?

VICE CHAIR KEISER: I think you're
absolutely correct. And one of the challenges
we have, not only the nomenclature among
accreditors, but among states, just the
definition of a degree.
Something as basic as, "What is an associate degree?" there are so many variations, and which inhibit student transfer, which inhibit a lot of, I think, coordination, especially in today's student environment where students are moving from institution, to institution, to institution.

So, I don't know if it's a matter of convening the community to come together to create common definitions, not necessarily the single definition, but common definitions, where everybody could come to agreement.

And, you know, like you said, institutional assessment or outcome assessment, we'll have out institutional come in and look at it, but then we'll have 23 other accreditors come in and take a stab at it. So, you have 23 different viewpoints coming at you at one time.

And by the end of the 10-year cycle in your regional accreditor, you've already changed nine different times because of the,
you know, the different input, and I'm not sure
you'd know, even coming together with a stew
that might not really taste that good.

So, I don't know. I think you're right
on in terms of encouraging the creation of
common definitions. I think you're right
about IPEDS. For some institutions, it makes
no sense when you're only looking at a certain
type of student, which, in today's world,
doesn't really exist anymore.

CHAIR PHILLIPS: Rick O'Donnell?

MR. O'DONNELL: Thanks, Susan. I
was not on NACIQI when the original report was
put together, so all I know is what I've read.
But, it seems to me that a lot of the original
report talked about, and used language such as
reconsider, encourage a dialogue, create
opportunities, which is all important things
that should happen.

And then one recommendation
suggested we should undertake -- someone should
undertake a substantial modification to the
existing statutory and regulatory criteria and their application to make them more possible, less intrusive, prescriptive, costly, and granular.

It seems to me that we have two options. We could recommend -- you know, there was a minority report attached to this. We could step back and recommend some large changes to the accreditation system, or more along the lines of the original report, if we're going to keep and recommend the framework that exists currently largely maintained, it seems to me we should actually undertake the review ourselves.

Because I'm not sure who we are expecting to recommend the modifications to statutory or regulatory criteria. I guess the Department will do that. Members of Congress might do that. But, why doesn't NACIQI do that? Because we heard over the last two days a lot of places where things could be less intrusive and prescriptive.
And that's really getting down into the weeds, but I think as Judith Eaton said, there are few bodies in the country that are in the weeds as much as we are.

And so, one suggestion would be if we think that, you know, I wouldn't quite call it rearranging the deck chairs on the Titanic, but maybe we want to throw some deck chairs over if we think the current system largely should stay in place, but we just want to make it less burdensome on the institutions.

Why don't we come up with a list of however many specific things we see in regulation and statute that we would recommend be changed?

CHAIR PHILLIPS: Thank you. John?

DR. ETCHEMENDY: Could I just second that? And this was something that came up a number of times, the idea of basically, in effect, zero-based budgeting, or zero-based regulating.

And, you know, let's go back to the
beginning and do an exercise in deciding if we were to build an accreditation system now, and -- to perform this function, what are the regulations that would be absolutely essential for us to -- the standards?

And try to clean away so much of this. And if we could do that, I think it would be an incredible boon to the entire system to get rid of the things that we waste time on, and the whole system wastes time on, and just leave the things that are really essential.

CHAIR PHILLIPS: Thank you. Anne and Arthur?

MS. NEAL: Yes, I'll jump on that as well because I heard yesterday a number of people essentially say, "Let's do a blank slate. If we were doing this, we would not have the system we have today." And so, I do think trying to look at it fresh as to -- what would it look like?

And I think the alternative last time around, essentially, was trying to look at
it rather than just simply tweaking around the edges. And what I heard again from the folks yesterday is that looking at the majority report, that it was going to be more burdensome, more regulatory, more enhanced requirements.

And so, I think looking at it fresh would be good, and I think looking at the issue of costs and how the system might not increase costs, and how it might even contribute to affordability would be something that, I think, is worth of that.

And I guess, following up again on something that Terry Hartle said yesterday, he was talking about the significant failure of the Department to essentially undertake the financial responsibility review.

And we know that accreditors are looking at the finance, but presumably, that threshold look at financial responsibility should come at the Department level.

I would like to know more as to why that financial responsibility overview is not
working, that is not effective, and how that
could be improved, because I think that would
be very, very helpful.

CHAIR PHILLIPS: Thank you.
Arthur?

MR. ROTHKOPF: Yeah, on the -- sort
of following on Rick's idea of maybe
rearranging the deck chairs, I thought one
point that came out this morning from CRAC that
was interesting is that they didn't feel they
had the authority or the ability to get into the
risk-based accreditation.

They weren't sure how to do it. They weren't sure they could do it under the
existing rules. And I actually think that's an
improvement if we want to change the system. I
think risk-based accrediting is a good idea in
that it eliminates or reduces the burdens on
some institutions.

It's a complicated question. But,
I think we could make some contribution in that
direction, and urge that there be regulatory or
statutory authority to do that.

CHAIR PHILLIPS: Frank?

DR. WU: I also think it's a good idea to look at the blank slate and to start from there. I wonder, though, if as a body, we might have some threshold issues that we would have to consider such as the likelihood that what we write would actually come to see the light of day.

I think probably most of us don't want to write something that will be shelved, but would rather write something that has some possibility of being put in place.

And so, there was a major issue that I think distinguishes what we did in 2012 from the minority report in 2012 that we probably would have to deal with, which is the proposal to delink.

I personally think the linkage should stay, and that is what we decided as a body in 2012, but I recognize that there are significant portions of this group that don't
share that view.

So, if you start from a blank slate, those are two very different blank slates, the one where linkage is taken for granted, and the one that doesn't have linkage. So, that would have to be resolved so that you see the parameters of that slate and can start writing.

The other comment that I wanted to make is there's a distinction here between substance and process. Some of the issues are about substantive rules, that is some of the agencies think, and some institutions of higher ed also think, that the substantive requirements, the rules that are being adopted by the Department and that staff carries out, the standards that we apply, have a problem.

They're too onerous. They're looking at the wrong things. They're using the wrong metrics. They're not consistent. That's about substance.

I wanted to mention though, and this is mentioned in the 2012 report when there's
some discussion of what is NACIQI as an advisory body, that it seems to me there's a whole other set of issues where we actually might be better able to get consensus, which are all about process.

For example, how do we, as a body, do our work? You know, I sense sometimes, regardless of our views or who appointed us, some frustration around the table at why is it that two dozen of us have flown from all over the country to spend two days in a conference room engaged in the exercise we're engaged in? Is it actually meaningfully related to the quality of higher education in some way? And if it's not, all of us have other things we could be doing.

So, I wonder if we could think about the process. How do we do this work? How do we relate to the staff? How does the staff do its work? Because a big piece of what I heard was not about the substance, but about how staff engages in back and forth.
think our staff is great. I admire the staff. They're doing what they've been directed to do. But, I wonder if the back and forth about documents, for example, because so many of these cases come to us where it's a puzzle whether there's actually a real problem, or whether there's just been a lack of communication and documentation.

So, I wonder if we might spend some time, where I think it's highly likely we'll get a consensus among us, thinking about process. How do we do our work? How do we interact with staff? How does staff do its work and deal with all of the bodies that come before us to testify? Thanks.

CHAIR PHILLIPS: Art?

VICE CHAIR KEISER: I think we're moving to the third issue, which is a good issue. But, just to stay in Frank's discussion, I think we also need to look at our relationship with the Department, in that we make a recommendation and it's ignored, or
I think the question is why we're here, which the -- I think I've heard that three or four times since we've been here in this meeting, more than I have in the past.

But, I guess we're reflecting on what we're doing anyway. So, that's an important consideration. And possibly we need the recommendation to put a little more, you know, little more advisory, or a little more requirements in whose advice is given and taken somehow, to let the Department know that what we are doing is considering, in a very intellectual and positive way, taking out the politics.

And where politics trump the decisions that we make, that becomes a problem somehow politically, and we can, you know, reflect that in the law.

DR. WU: May I ask Art a question? From everything I've read, my understanding is that the old version of us had more power, that
is, it actually decided. Do I have that right? Because Art, you were on the old version, and --

VICE CHAIR KEISER: It seemed we were more involved in the decision making. And though -- it was the political process that got us dissolved. So, you know, right, Arthur? You know, it was a difficult -- Anne, you know better, right? You were with me.

CHAIR PHILLIPS: I also have Carol to have some perspective on that as well.

MS. GRIFFITHS: Okay, I have to say that, while perceptions may be different, the role of the NACIQI and its authority and its functions have remained basically the -- have remained the same.

The committee has always been an advisory committee making recommendations to the senior Department official, and those recommendations were or were not accepted in full or in part. That has not changed.

I think in my tenure with the
Department, what I see is more involvement by NACIQI in this other aspect of your functions and your authority in the policy advisement part of it.

But, in terms of the review and your functions on the regulatory recognition process, that truly has not changed, although perhaps the perception of it has, you know, is different now.

CHAIR PHILLIPS: Isn't there actually a difference in the staff report -- the staff recommendation and the NACIQI recommendation go separately to the senior Department official? Isn't that new?

MS. GRIFFITHS: Again, it's more perception. It always was to be separate, and it was. But, the perception was that the staff worked for NACIQI.

And it was made most clear during the last reauthorization on the Department's side to try to reinforce and emphasize more clearly that the staff is Department staff, and
the Department sends a recommendation through. That has never changed, that was.

But, this time, it was reinforced and emphasized that NACIQI makes its own independent recommendation with the advantage of having some input in terms of the materials you have at your access, in terms of doing your deliberation and review. That was the emphasis that, you know, was applied to what always had been in place, but just not felt.

CHAIR PHILLIPS: I have Jill and Arthur.

DR. DERBY: Well, really following up on what some of my colleagues have said, and said well, as Rick pointed out, I was struck by what Judith Eaton said yesterday about, "This is a collection of people that know more about accreditation than anyone else," and it struck me. And I came in after this 2012 report was put forward.

But, it struck me that we have here a collection of very smart people who know
higher education and understand accreditation well. And to some degree, the role we play in the recognition process is valuable, but it seems very staff-driven.

I rarely, although there have been occasions, I know, when we've disagreed with staff. But, it seems to me, reading through that, I'm struck with it's been very thoroughly covered, and very well done. We have a great staff that does that.

So, it's interesting to me that we're talking about our policy advisement role, and it seems to me with this collection of people who, as Frank said, give up several days to come here, that we would be well used to engage more so in the policy advisement role that we have.

It seems as though we haven't really played into that other than the 2012 recommendation. And I realize this is a newly constituted, still fairly newly constituted body that is finding its way and trying to see
how we can make the biggest difference with some of the really important issues that are facing higher education.

So, I was pleased to see this agenda that focused very much on that policy dimension, that policy advisement role that I'd like to see us step into even more so. Thank you.

CHAIR PHILLIPS: Arthur?

MR. ROTHKOPF: Yeah, I would second what Jill said. At least for me in three years, it's -- I find the recognition work, as I think all of us do, to be somewhat routine.

And I think our disagreements with staff have been minor, and on a couple of occasions, overridden anyway. So, I think that's a less important role than what we've been talking about the last couple of days.

Let me throw out something, which is probably not what we should do, but there's an argument for it. And that is with the restructuring of NACIQI and the fact that 12 of
us have been appointed by the Congress, why don't we, rather than just issue our reports or advice to the Secretary, why don't we take the position that we are also advisory to the Congress?

And take our report, and not just send it to the Secretary, but send it to the relevant -- to the Speaker, the Majority and Minority Leader in the Senate, and let them know that, you know, that 18 of us are around to help advise them as they move forward.

In fact, I see in The Chronicle today that there's about to be introduced next week a reauthorization proposal by the Senate Democrats. I don't know if The Chronicle is right, but that seemed pretty detailed and pretty accurate, talking about some of the very issues we've been talking about. So, maybe we should be available to all parties.

DR. WILLIAMS: Carolyn Williams. I concur with much of what's been said. I, too, would like to see us move more into the policy
realm. I think we spend an awful lot of time
going through fairly routine and a very
comfortable process as we listen to the reviews
and we move in that direction.

But, I think our value could be used
more wisely if we were more engaged in the
policy aspect. I think that we do need to
streamline what we do, looking at it in a
different approach.

CHAIR PHILLIPS: I have John and
George.

DR. ETCHEMENDY: So, I'd like to
say something about the delinking and Frank's
comments. It seems to me on the one hand I
think there is a -- there's a clear tension
between the roles of setting minimum standards
for eligibility for Title IV funds, and the
quality assurance and improvement agenda that
actually was the original reason for the
accreditation organizations.

And they don't always sit together
well. Think, for example, accreditation
organizations have a bunch of requirements, and
some of them have to do with what they think is
good practices for improving your quality,
which is something that every institution
should be doing whether -- no matter how good
they are.

But, that, of course, has nothing to
do with their meeting a minimum standard,
right? So, that's -- and yet, if you --
supposing that, imagine you had an institution
that was doing an excellent job, but refused to
do some of the other things that the
accreditation organization asks it to do,
should they have their accreditation taken
away?

Well, they certainly shouldn't have
their Title IV eligibility taken away because
they're doing a great job. They just don't see
this other thing as important to them. And I
have actually seen institutions where that
seemed the case, outstanding institutions that
just did not want to enter into the game of
direct learning assessment, for example, just
to use an example that came up yesterday.

So, there is an argument for
delinking, and there are different ways of
doing that, however. One was what the minority
report suggested, which was basically, I don't
know, roll up the system and take it -- just
completely take that away from accreditation
organizations and turn that over to the
Department.

And I think what's scary about that
is that we don't know exactly how that -- how
the Department of Education would then proceed
to perform that function. And, you know, I
have lots of contact with -- on advisory boards
for other countries, higher education, and
universities, and so forth.

And I'll tell you, the best
indication of how bad a higher education system
is, is how intrusive the ministry of higher
education is. I mean, you have a ministry of
higher education and you know right away that
that country's not going to have great universities, frankly.

So, you don't want to go in a direction that might lead to a ministry of higher education mindset in the Department. And I don't think the Department wants to do that either, I hope.

So, there are different ways of delinking, one is to delink that way, and another is to just delink the accreditation. That is there's -- you could -- imagine having two different things. Do you want -- are you accredited in the traditional sense? You meet all the standards. And are you Title IV eligible? Just separate these two questions.

And you could imagine then an accreditation -- and leave it with the accreditation organization and say, "We want you to do two things. You do what you've been doing with accreditation, but we want you also to give us a separate judgment on whether or not the institution is Title IV eligible," separate
You do it, so we're not taking that out of your hands. But, it is not the same as the judgment about accreditation. So, that would be another way of delinking, and it would be a way of delinking that didn't do the, what I see as the rather dangerous, move of moving the eligibility into a central, federal agency. That's all.

CHAIR PHILLIPS: Thank you. I have George and Bobby.

DR. FRENCH: Madam Chair, I'm looking at the questions that you asked us to consider, and the first one being, of course, what from the April 2012 report needs revising, and what areas, secondly, should have been included?

I think that's where I have my consideration. I think the 2012 report gave a lot of concentration in the accreditation recognition area. I don't think that I see in the report, however, what we're discussing now,
the policy advisement role, enough.

    I don't think we really defined what
the policy advisement role should be of NACIQI
in the 2012 report. And looking through it
again, recognition is there. It's very clear.
Quality assurance is very clear.

    But, I don't think we just clearly defined
what our role should be as policy advisors.
And I think the conversation should be had more,
and then we need to include it in our next report
as more clearly defined.

    CHAIR PHILLIPS: Thank you.

Bobby?

    DR. DERLIN: I've been working so
hard to capture everyone's words. I want to
first speak to kind of two issues as I've been
seeing them emerge. I think this idea of a
matrix kind of structure for our report is a
very good one.

    And I would suggest, based on other
conversation that's been occurring, that a
role, if you will, in the matrix might be this
issue of procedures, and process, and a
detailed examination of the criteria.

And a different role might be the
roles for NACIQI, which I think would allow us
to really articulate more carefully our
interaction with policy and broader issues than
just, "Is it 25 criteria, or is it 95? And is
25 even too many? And do we have enough
substance or not?"

I also would join John and maybe
some others in advocating that there are more
options than delinking from Title IV and doing
nothing.

And I think we've heard
considerable support in our presenters for
finding ways that might facilitate us in
supporting accreditors in disengaging so much
from enforcement activities, and having a
different kind of judgment imposed about some
of their activities, versus speaking on Title
IV.

I think there's more than -- I think
it's more than an either/or situation. And my
last comment on this issue, which I'm not sure
exactly if I'm talking about new topics or --
I forget just what the three things were you
told us to do.

I think we should take to heart
some of the ideas that have emerged from others,
and from ourselves in our past report, and see
how they really influence us.

And I'm thinking of things like
we've got sort of questions about expedited
review process, which is sort of on the front
end, and do all -- is it necessary for us to
approach accreditors, as we sometimes are
critical of accreditors approaching
institutions as one size fits all in terms of
what the process is?

And I think similarly, in outcomes
of our process, we might think about tiered
kinds of issues. So, I think we could apply
some of those concepts to ourselves. Thanks.

CHAIR PHILLIPS: Thank you.
VICE CHAIR KEISER: I'm thinking of the events that have occurred since we wrote the report in '12. There have been some significant issues that I think affect accreditation, and potentially affect the linkage issue. And we dealt with it at the last meeting with the Western Association.

And if you follow that specific issue, to me, it throws a tremendous scare into the whole viability of accreditation and linkage, in which an independent accrediting body -- and again, it depends on your political persuasion whether you thought it was thoughtfully -- made a thoughtful decision to remove the accreditation after multiple review processes -- and the subsequent political involvement, both from a Department level, and from a political level, from a -- you know, from Nancy Pelosi, you know, the Unions, the lawsuits, really undermined the authority of the accreditation process.
And I think it sends tremendously bad signals to the accrediting community that if they take a, kind of the "too big to fail" school on, which is consistent and fair with the processes that we are asked, again, to follow, they could have serious political and legal challenges that could threaten the viability of that agency.

Someone brought up in the discussion today, and I don't think we addressed it, or we kind of skirted it the last time, is providing -- if we're going to rely upon the accrediting agencies to make difficult decisions, then we need to provide them some kind of protection, or some kind of indemnification to be able to make those decisions that doesn't, you know, basically threaten their ability to exist if they make tough decisions that we require them to do.

So, I think that's something we need to consider going forward, and in a recommendation.
And I'm not sure I know the answer, because it is -- it was so -- I mean, just reading the literature, you know, again, I don't know how much of it was press bias or press sensationalism, but I wouldn't have wanted to be on the WASC Commission during that process. It was pretty nasty.

So, it's something for us to consider in terms of our recommendations going forward if we expect accrediting agencies to do the tasks that we give them, and that is to be the gatekeeper.

CHAIR PHILLIPS: Thank you. Jill?

DR. DERBY: I'm sure you had a very spirited and thorough conversation about this delinkage issue in the 2012 process, and I wasn't here for that. But, I just wanted to ask a question really, because I was struck yesterday.

One of our panelists, and I don't remember which it was, spoke passionately about not delinking because -- for the reason he said,
that it would detract from an institution's incentive really, and somehow maybe undermine the whole accreditation and quality efforts, because the focus would be much more on Title IV eligibility.

So, I heard that, and I thought that's interesting. It sounds like this conversation around linkage or delinkage has a lot of substance to it, and I'm interested in knowing more.

CHAIR PHILLIPS: Anybody want to fill her in on the delinking? Arthur, Anne, either? Art, go ahead.

VICE CHAIR KEISER: Well, there are those who believe that accreditation, in and of itself, is a valuable enterprise, and that it should stand for educational quality, not a stamp of approval by the Department of Education.

So, the linkage issue is to try to take that gatekeeping function, that is what is the door to open up the Title IV spigot. It's
much more complex than that. It's not as simple as just getting accredited.

You still have to go through the Department of Education. You still have to get all of their approvals, which takes a very long time for a new institution to get that approved. But, it is the entryway. It is the gateway.

The other side is accreditation should stand on its own because it's an academic function, and not one of financial aid opportunity. And by combining them, you kind of create this monster organization that serves two masters, and doesn't serve either one of them well.

Is that a fair assessment, Anne? I was trying to not be biased either way. I can give you both sides, the other side too.

MS. NEAL: It gets back to really accreditors essentially being federal actors when they are Title IV gatekeepers. And they started out as peer review voluntary bodies, which provided excellent insight on
And then once you give them the gatekeeping role, they do become federal actors and enforcers. And I think, as Arthur said, those two roles create the tension and the problems that I think we heard about.

CHAIR PHILLIPS: So, with my tongue-in-cheek compliments on how well we followed the directions, I just want to restate the possibilities for comments if we've missed anything.

What needs revising, clarifying, simplifying, and updating from 2012? What areas were not addressed in 2012 that warrant new policy recommendations now? And are there areas of NACIQI role and operation that could better serve the goal of assuring quality in higher education?

All topics are fair. Are there any of those that you have further thoughts on that ought to be on the table? John?

DR. ETCHEMENDY: Well, under the
new areas, let me just mention what - something that I said earlier, which is I think this idea of differential access to aid somehow or other thought through, whether that's, you know, in a reimbursement only model, or, you know, something that shares the risk, the loan repayment risk between the institution and the federal government.

Similar to that sort is I think that's really, really interesting. Now, I don't know if that's something that we would like to, you know, weigh in about. That's obviously legislative. But, so, I'll throw that out.

CHAIR PHILLIPS: Bobby?

DR. DERLIN: I like the idea of further examination of some institutional skin in the game in terms of the whole financing scheme.

I also think part of the thought about delinkage has to do with this voluntary membership on the part of institutions and
accreditation associations, and perhaps over-familiarity among folks who participate in peer review, and there's some issues about that.

And so, I think some of the other models that we were able to read about in the paper, like maybe a contract kind of based system, I think those ideas - it would be good if we had an opportunity to do a little more group think.

It doesn't necessarily have to be group think in a room. It could be group think with some other phone or technology or whatever, to do some group think about some of those other kinds of proposals that have emerged.

CHAIR PHILLIPS: Rick?

MR. O'DONNELL: I'd just echo both of these comments. I think sometimes the federal government's, in my judgment, legitimate concern about how tens of billions of dollars gets spent, accreditation seems to
be - accreditors need to solve that problem, and
institutions need to solve that problem, but it
actually may be, you know, underlying problems
within the statute with how loans are given, and
that they are, in essence, an entitlement with
no real responsibility on the part of the
individual receiving them or the institution.

And so, a lot of the stress that's
put on accreditors and the accreditation
process might go away if we actually solve some
of the underlying problems.

So, I would, again, it may be
slightly outside the purview of accreditation
per se, but if it solves some of the
accreditation problems by making
recommendations on the student loan, and
financing, and Pell Grant side, I'd advocate
that we take a look at that as well.

CHAIR PHILLIPS: Thank you. Bill?

DR. PEPICELLO: Yeah, I would agree
with those comments that were made. I think
it's - it might be worthwhile, although, again,
more imposition on our time, to actually look at, and maybe blue sky, some zero-based models.

Because it goes - one of the comments that Jill made yesterday was, "Well, what's the motivation for an institution to work with accreditors if there's delinkage?"

And, as an example, if I'm an exclusive institution and I'm deemed Title IV worthy, even if I don't use Title IV, and everybody knows my brand and I'm good, why would I bother?

And I think there are some basic questions about revising the system, and I am not opposed to that. I think that's something that we really do need to look at theoretically without expecting that it's necessarily going to get us anywhere.

Because we've had some discussions here over the years where we got an issue on the table, and we discussed it and said, "Oh, nevermind. We don't want to do that." So, I think those are ideas that are worth pursuing.
CHAIR PHILLIPS: So, let me just give a snapshot of what I think I've heard so far. And let me first say I hear a fair amount of commonality in what is being said, certainly on the level of detail and interest in advocating for common definitions.

In the interests of simplification, perhaps I'll call the category simplification with one component of it being common definitions, a second component being what I'll call zero-based regulation in terms of what is asked of accreditors.

I also hear interest in exploring further what I will call the category of nuanced accreditation or recognition decisions, whether it be risk-based accreditation, or variable interval, or something that is not quite one-size-fits-all, yes or no. So, I'll call that nuance - enhancing nuance in the recognition accreditation process.

The fourth - the third thing that I hear is the connection between aid compliance
and quality assurance. Sometimes that's called linkage. Sometimes it is called accreditors should not be compliance enforcers, so, something about the relationship between the actors and the money.

That could be revisiting the linkage question. It could be looking at different models of how the aid eligibility is connected.

It could be some of the ideas that were discussed about differential access to aid, or potentially the institutional skin in the game. All of those are variations in that conversation about the connection between these two domains of quality and money.

The fourth thing that I hear pretty strongly right up front was that the sense of engagement with policy questions is of interest.

While that is half of our charter, as we were reminded yesterday, I hear that there's - that isn't - hasn't been experienced
as being a sufficient proportion of our time and
effort, so, a - certainly a message to us, and
perhaps also a recommendation to the Secretary
to use us more in that way.

Okay, so, for four things I'm
hearing, simplicity, nuance, the connection
between quality and money, and our policy role.
Have I missed anything? Does that capture what
you have heard today and what you would like to
develop our thinking around further, those four
areas?

VICE CHAIR KEISER: How broad do
you interpret that third one of quality and
money? Because that's pretty nuanced in terms
of whether - are you talking about the
gatekeeping function, or are you talking about
-

One of the things that really
impressed me was the issue of, you know, if
we're asking the accrediting commissions to be
gatekeepers, that we don't have their back when
it comes to the fact that they make decisions,
and the WASC is, to me, the biggest example of that.

So, to me, that's a real critical discussion in terms of ensuring that if we're going to empower accrediting people to do the gatekeeping function, then we have to have their back when they do it.

CHAIR PHILLIPS: Let me ask for a bit more discussion on that money and quality connection. I put a lot into that bucket, and there's a couple of pieces in there that I'd invite some further conversation on.

One is the one that Arthur just mentioned, is the money concerns of the people who enforce quality. One of them is the asking accreditors to serve as federal actors. Another is to ask accreditors to serve as financial aid - federal student aid compliance offers.

Another is thinking about how to - whether - how to connect, or whether to connect the notion of traditional academic quality and
access to financial aid. There's a lot of
ground in there. Jill, go ahead.

DR. DERBY: One I didn't want to see
get lost in the broader umbrella, as you said,
there's a lot under there, is the point that
John made about, you know, sharing the risk
between the institution and the federal
government in the realm of student loans, and
as Bobby said, skin in the game.

I think that's important, and I
think that I'd like to see us spend some time
weighing in and talking about that. It was a
good point. So, putting it under - it does fit
under the umbrella, but I wouldn't want any
point minimized, and particularly that one.

CHAIR PHILLIPS: Bobby?

DR. DERLIN: There's a piece of me
- and I don't think any report that we do should
not reference quality. But, there's a piece of
me that thinks the issues we're talking about
now might be better captured as talking about
federal financial aid relationships, or
enforcement relationships, or keeping it
tighter on just focusing on the financial aid
relationships, and actually dealing with
quality kinds of issues that we see, sort of
like its own row.

You know, if we're thinking about
Bill's matrix idea, we've got a role on
procedural stuff, a role on roles. And maybe
our federal financial aid issues or
relationships is a role, and quality is
separate. I don't know.

But, everything that people just
raised has to do with federal financial aid more
than institutional quality right now.

CHAIR PHILLIPS: Art?

VICE CHAIR KEISER: It's a broad
topic, Bobby. I think you have a situation in
terms of the Title IV side of it. You also have
the program of the auditors every year going in,
and the financial aid auditors going in every
year. So, you have a different side of it.

Our side of it is the accreditation
side, which is the institutional quality issue. And, you know, most schools are removed because of finances. They can't afford to continue the operations. Students are at risk. Accreditation is pulled, which makes it even worse because then the Title IV is pulled, at which point the school is a self-fulfilling prophecy in that respect.

But, you know, the - I think in the case of the Community College of San Francisco, it was not on financial aid issues that the Commission made the decision, it was on education qualities, what I read, which would mean that there are two separate silos there that the government is using.

Now, they can go in, and if they find fraud, or abuse, or misuse of funds, they can pull the Title IV without the accreditation even being - they'll be made aware afterwards.

But, you know, it's just only one part of the whole role, and it's all tied to the "institutional quality" of the institutional.
CHAIR PHILLIPS: Other perspectives, clarifications on this money/quality bucket that I might want to clarify in that area?

Okay, so as I said, there is a fair amount in that bucket, everything from quality and aid eligibility being entirely separate, that's the complete linkage/delinkage question, to having different ways in which - or more nuanced ways in which those two might be connected.

I venture to guess, just thinking about the kinds of questions that we have been hearing about, or mentions that we've seen, that is something that would be beneficial as the group took that up, would be to learn more specifically about the federal student aid process, and what it is that accreditors are asked to do, for instance, to assess that, simply for our own - that wasn't included in this forum, but would be useful.

So, I can imagine these four, again,
four areas, simplification, nuance, money and
quality, and policy role, being, sort of, the
four areas in which we would want to focus our
attention in developing recommendations,
whether they be recommendations to ourselves
for our own conduct of business, or
recommendation to the Secretary, or to
Congress, whoever we would like to advance
those recommendations to, as we think about the
Higher Education Reauthorization Act and how it
might shape our work going forward.

So, that's what I'm hearing so far,
is that that's - we've really sort of defined
four areas of focus for recommendations. Let
me just pause there and invite people to
disagree, add, alter.

Okay, so realizing that - I just
wanted to give you a chance to think. Forge
forward.

My suggestion then, at this point,
would be to take this then - If you'll recall,
back in January, I think, I probably asked for
people who might be interested in participating in a smaller working group over the summer to develop recommendations.

It seemed appropriate to let people know what they would be composing recommendations about before I asked them to sign on the dotted line.

So, now what I would do is send out to the full committee, those who are here as well as not here, these four areas, that this would be the focus of a subcommittee group to work on those four issues, developing recommendations over the summer, bring back to the full committee for consideration, obviously for public comment as well, before finally adopting or whatever at our December meeting.

So, we see that as the next step. We've defined our four areas for developing ideas. Obviously, there's lots of stuff underneath each of those to take on. None of them are small ones, but would be taken on by,
perhaps, one smaller group, not necessarily the
whole committee, unless everybody decides
they're going to sign onto a subcommittee, in
which case, we'll work that out, and work over
the summer coming back with targeting September
to be an outcome date.

So, that was the plan. Does it
still make sense now that we've identified the
four? Okay. So, let me offer then the next
step as being - we're now back ahead of
schedule, excuse me. Art?

VICE CHAIR KEISER: Are those four
in addition to the - some of the other areas that
we looked at before like data?

CHAIR PHILLIPS: I wasn't hearing
anything about data in this conversation.

VICE CHAIR KEISER: So, we're not
looking to modify what we've submitted? We're
looking to redo, restart?

CHAIR PHILLIPS: I'm not sure I
understand you.

VICE CHAIR KEISER: Well, we have a
- I know, Frank, that was one of your big areas, was the data, the data issue. And are we going to drop that from our discussions?

   CHAIR PHILLIPS: So, right now I'm not having a category called data that I heard from this conversation.

   VICE CHAIR KEISER: Right.

   CHAIR PHILLIPS: I do hear that there is data interest in common definitions and in what I call the zero-based regulation. But, I am - I have not yet heard, and perhaps this is the moment where I say are you sure this is the only thing that you want to talk about?

   (Laughter)

   VICE CHAIR KEISER: That's why I brought it up.

   CHAIR PHILLIPS: Yeah, yeah.

   VICE CHAIR KEISER: Because that was not controversial, but -

   CHAIR PHILLIPS: Mic please.

   DR. WU: Doesn't it just fit within one of yours?
CHAIR PHILLIPS: All right, which one would you put it in?

DR. WU: I'm not sure, but -

(Laughter)

DR. WU: I think it fits in one of them.

DR. PEPICELLO: Yeah, I'd put it in the commonality.

CHAIR PHILLIPS: Commonality?

DR. PEPICELLO: I think so, because I think that's where it really goes if you look at it in that matrixed way. That's probably where it fits I think.

CHAIR PHILLIPS: Art?

VICE CHAIR KEISER: And then the other, where would the Triad fit in? Because the Triad is still a major problem, and the states, the feds, and the creditors don't always communicate. Well, I was involved last year at a train-out and nobody was talking together.

CHAIR PHILLIPS: I agree. I
didn't hear it as a comment/concern across this group as they were talking about what they wanted to focus on next. Just - feel free to disagree with me on this. Bobby?

DR. DERLIN: I think it is an issue, and I would be inclined to say that that's a piece of our engagement with policy conversation, that the roles of these actors fit within that item. But, that's just me.

DR. PEPICELLO: Yeah, I think also that -

CHAIR PHILLIPS: Bill Pepicello.

DR. PEPICELLO: I'm sorry. That piece almost falls out from the other four areas. That if we can reach some consensus on some of those issues, that those then are applied to how the Triad interacts.

CHAIR PHILLIPS: Or at least offered to the Triad for consideration. Simon?

MR. BOEHME: Simon. You know, I just wanted to remind the body again that I
think that there are a whole slew of issues in higher education right now, access, affordability, and innovation. And, you know, I don't have the answers for all of this.

This is something that I've been thinking a lot about, and I just, you know, want to remind the body that we have so many important issues and primarily dealing with thousand - or millions of students.

And, you know, I'm not sure that these four things really kind of mix things up, and really encourage accreditors and institutions to really up their game and match some of these challenges of the 21st century.

And I certainly can't think of some more categories right now, but I just think it's worth of discussion that accreditation is very unique, that we - that they can encourage higher quality.

And I think we just need to keep in mind that there are millions of students who, I think, are counting on this body to really
ensure that some issues such as access, affordability, and innovation, encouraging the institutions across the United States to do better, and always do better.

DR. PEPICELLO: This is Bill Pepicello. I think to that point, part of the four areas that we're discussing right now eventually address those issues because, as somebody brought up in the panels yesterday, these issues are us trying to help accreditation get out of its own way. And if we can do that, we can focus on those things that really count.

CHAIR PHILLIPS: Or ultimately getting us out of accreditation's way.

DR. PEPICELLO: Oh, never.

(Laughter)

CHAIR PHILLIPS: Just thought I'd mention it. So, as we think about the ultimate purpose, which is to ensure quality, greater quality in higher education, have we captured our immediate task of developing
recommendations for the Secretary and whoever else would like to listen, including simplification, nuance, connection of quality and money, and our role in policy and developing policy.

We've incorporated the Triad into the fourth one. We've incorporated data reduction into the first one. And all of them, we're hoping, would go towards the improvement of access, affordability, and innovation, and quality in higher education. Simon?

MR. BOEHME: This is Simon. Would the policy recommendation number eight from the 2012 report go under simplify? This is the, "Encourage a dialogue within the accreditation community about the structure and organization of the accreditation enterprise."

CHAIR PHILLIPS: Sure.

MR. BOEHME: Thank you.

CHAIR PHILLIPS: I feel a bit like an auctioneer, going, going.

(Laughter)
VICE CHAIR KEISER: Well, also the last question of the three that we started with, which was the role of NACIQI, now, that's a fourth area - fifth area?

CHAIR PHILLIPS: That's the fourth area is the role of - the policy role that we have.

VICE CHAIR KEISER: Well, it's not just a policy role, it's -

CHAIR PHILLIPS: The operations role.

VICE CHAIR KEISER: - an advisory role. Right, of all types.

DR. WU: Right, our role, our whole role, both in policy and when we hold hearings, and in how we recommend and interact with staff.

CHAIR PHILLIPS: Jill?

DR. DERBY: I just want to follow up on what Simon said, and what Bill said, because I'm not clear about that connection. Affordability - access and affordability are huge issues in higher education, and I'm not
sure how what we've laid out here, unless it is
in category four, just general policy, I'm not
sure how that fits in under the other umbrellas.

MS. NEAL: I think we can fit it
into the money and quality issue. It seems to
me that that can easily incorporate looking at
innovation and whether or not the current
structure is impeding that, as well as impeding
access and affordability.

CHAIR PHILLIPS: If I can respond
to that? Also, if indeed we could achieve a
reduction in data, common definitions,
efficient structuring of accreditation,
zero-based regulation, a nuanced accreditation
system, a clarity about the relationship of aid
and quality, and a more effective role of this
body in interacting with staff and around
policy, that the goal of all of that is to
improve quality assurance in higher education.
So, it's a product – I would put it as a product
of all of it.

DR. DERBY: My question was really
about access and affordability more than about quality assurance. I think it is clearly very focused on quality assurance.

MR. BOEHME: Yeah, to Jill's point, I just worry, and I echo your point that these key things that are on the minds of students, on parents, administrators, I think is really going to seep through the cracks in this conversation with these four categories.

I think they are broad, but, you know, I worry - I think what John brought up is delinkage of the accreditation and separating that out. I think that's a novel idea and worthy of exploration.

But, I think then it's going to be on our job and our responsibility to ensure that those important issues stay around. And I would push, maybe, for a fifth category. I'm not sure how we would frame that, but I'd be in favor of looking into that.

CHAIR PHILLIPS: Arthur?

MR. ROTHKOPF: Yeah, one subject we
haven't talked about at all, and understandably, because it hasn't yet surfaced, but let's assume this report would be - come out in December, or that would probably be the earliest it could come out.

In the meantime, as we heard yesterday from Jamie, there is this proposal for rating of institutions, which may or may not relate to accreditation. It certainly will - may or may not relate to Title IV.

And I'm not sure how we want to deal with it or not deal with it. I mean, it would be comfortable not to say anything, but it could be that when our report comes out, or this report, that it will be a very hot topic, and someone may say, "Well, gee, what does NACIQI think about this ratings system?"

I can tell you what I think about it, and I'm sure all of us have a view without knowing all the facts. But, it's a big deal. And, you know, Jamie couldn't really answer the question of how it does relate to
accreditation. It's kind of a murky relationship there.

So, I throw it out without a solution, but it's something that we may be even forced to deal with at some point.

And let me give you one other unrelated to that, and that is the fact of the matter that six members of NACIQI terms end in September, September 30. Some or all may be re-upped, or may not.

And as I understand the rules, once the clock hits midnight on September 30, you can't do anything on what's being discussed here. It's - you're a member of the public, and there's no such thing as an emeritus NACIQI member.

(Laughter)

DR. DERLIN: No matter how much blood you've donated.

CHAIR PHILLIPS: My sense of that, just to respond to the ratings system, my sense about that is that there - this body will
certainly want to respond once it knows what to - there's something to respond to.

And so, as that emerges, I can imagine that there would be some kind of consideration of that. Part of the challenge, I think, currently is that -

(Laughter)

CHAIR PHILLIPS: You don't know what to wrap your hands around other than there's a rating system.

MR. ROTHKOPF: Of course, part of the question is, you know, it's going to be the Secretary's system, and you know, what we say about it, I mean, we're reporting to him. But, as I say, I suggest maybe we report more broadly. I think there's a basis for that, and I think we ought to think about it a little bit.

CHAIR PHILLIPS: I'd like to ask the group to come back to the fifth area question that Simon had raised about access and affordability. If I were to characterize as one - the one biggest thing that has happened
since 2012, it would be the worry about affordability.

I'm not saying how legitimate that worry is, but the worry about affordability. That - the connection between affordability and quality is an interesting relationship.

And when, I believe, Simon, asked the institutions about their perspective on the connection between affordability and their work, they all said - actually the policy makers, "We don't see that affordability has any connection with quality assurance."

So, what do we do with the notion that access and affordability of higher education is very much on the minds of people, much more so than it was in 2012? And our mission of institutional quality and integrity, how do we - how would we like to tackle that, or set it aside, or not? What would you like? Anne?

MS. NEAL: I think Simon said at one point access and innovation, and I think those
two have to go together.

Because with the landscape changing, with various new delivery models, many of them much more affordable than the ones we currently have, and figuring out how to address all of these new delivery, which is really not currently addressed by the accreditation system, that I would put those two things together, access and innovation.

CHAIR PHILLIPS: And what would you do with affordability? Art?

VICE CHAIR KEISER: I have concerns, you know, that innovation by definition means affordability. And I think we have to be careful that the political agenda is not pushing the education agenda here.

And I guess to be specific, I have real concerns with the competency-based education that's being pushed politically because it's supposedly cheaper. But, it's - we have to be careful that, you know, innovation is good, and we want to encourage innovation,
but we also have to, you know, look at the long term impacts of it.

Because I'm a product of competency-based education in high school, and then when I taught in middle schools, it was a disaster for K-12 and they got rid of it because we created a generation of folks who didn't learn.

I just want to make sure we don't make the same mistakes just because of a rush to lower costs and lower student debt, which I think is a proxy fight that's not necessarily a fight of what we need to be getting into.

So, we have to balance between educational quality and affordability, and not rush to the affordability. I think, if anything, we can streamline some of the processes in lowering costs.

You know, I think one of them we were talking about earlier when we talked with the women from CCNE, that the commissions can be working together to lower costs for
institutions, which directly lowers costs for students. I mean, that’s how you do it.

You can lower the accrediting costs and look for ways to save money there, but you have to be careful about educational quality.

CHAIR PHILLIPS: John?

DR. ETCHEMENDY: Yeah, I just wanted to say that I think Simon is right to be concerned that if his point is not somehow made explicit. And the reason is that at the very lease, these are independent.

That is, affordability and quality do not necessarily - in fact, they can pull and have traditionally pulled in opposite directions because institutions have competed based on what they perceive as quality, and the affordability has actually gone down because of it in many cases.

It’s at least independent, and innovation is also independent from either of those because on the one hand, my experience with innovation at Stanford is that every
innovation just costs more money, you know. None of it is cheaper, but that's because of the, you know, the way we do it.

So, innovation can be more expensive. Innovation can be less expensive. So, these are three, sort of, independent criteria or whatever that we shouldn't lose sight of, and they don't necessarily all go together.

DR. PEPICELLO: Yeah, this is Bill.

CHAIR PHILLIPS: Thank you. Bill?

DR. PEPICELLO: Yeah, I completely agree, and with Art that, for instance, some of the new competency-based low-cost models also are not targeted at students who might most need that education.

Students who most need help and education, who do not advance quickly at their own pace will gravitate towards a higher cost model simply because they need more services and support. And so, I think it's really important that we look at that balance.
CHAIR PHILLIPS: Bobby?

DR. DERLIN: I guess I would just say that overarching concepts like these, I'm not necessarily - we've been thinking about this so far it seems with our four areas as kind of four buckets of information and thoughts that we would construct.

I'm not certain these big concepts really are individual buckets, or a bucket together certainly, I would say not.

So - and I don't know that we have to decide this right now. But, maybe we have an agreement that concepts like access, affordability, innovation, institutional quality, are going to stretch across and need to be recognized in our document.

And when we get a little farther along, we can figure out how to fit it exactly. But, certainly Simon's exactly right that these are big concepts that we don't want to be silent about.

CHAIR PHILLIPS: Simon?
MR. BOEHME: Sure. So, why I brought this up is because - and I'm reading from the NACIQI website - "Our primary function is to provide recommendations to the Secretary concerning whether," basically quality, right?

And why I think it's important that we talk about these three big, as John says, independent issues, is because I'm just worried that the accreditation system we have set up right now is not doing its job. And if it is not doing its job, then we are not doing our job.

We are supposed to provide perspectives, listen to the public, and offer this kind of advice to ensure that students are getting the best education possible.

And then I think it's just something that we need to keep on our minds, and whether it's the fifth bucket, or we keep the four buckets, I don't know, but we need to continue to push ourselves, and I don't think we are right now.

CHAIR PHILLIPS: I'm going to -
actually, I'll wait for mine. Art and then Frank.

VICE CHAIR KEISER: Simon, are you suggesting that accreditation is not doing its job? Because I would disagree with that.

MR. BOEHME: I don't think accreditation - I think accreditation is - had its role, and I think it's doing a fairly good job right now.

But, I think as we look to get students ready for the 21st century, and we try to constantly improve, I think one thing we can do about that is by ensuring accreditation agencies are doing the best job that they can, and they have - and they're pushing institutions to do well too.

CHAIR PHILLIPS: Frank?

DR. WU: Just an observation. I think what people have said here is absolutely right, that the public expects that this system reflects quality in some way.

If you asked a man or woman on the
street what does an accredited law school or
college, what is it? They would say, "Well,
that's a quality school." So, they would be
quite puzzled to learn that it's not
necessarily the legal and policy view that
these are linked.

And I think we're on the cusp of, if
not in the midst of, populist rage over the
costs of higher education, and people want to
know who is to blame. Is it higher education
leadership? Is it the faculty members? Is it
the federal government? And we have to take
this seriously, both quality and costs.

But, what I wanted to observe is the
following: if you look at our actual hearings,
when we look at agencies that come before us,
it's almost exclusively about compliance with
a set of rules.

Neither quality nor cost is ever
mentioned. And indeed, sometimes if it's
raised, we are reminded appropriately that
actually it may be beyond the scope of what
we're supposed to be doing.

And so, I have to confess, for myself anyway, that if you ask me, "What is the relationship between NACIQI's looking at whether an agency has complied with X rule or Y rule and either quality of higher education or cost of higher education?" I would have to say I'm mystified.

I see almost no connection between the hearings and what we ask agencies on the one hand, and either quality of higher ed or cost of higher ed on the other hand, and that strikes me as problematic.

CHAIR PHILLIPS: And appropriately added to our NACIQI role bucket. Art?

VICE CHAIR KEISER: I think Jill and I were talking about that earlier. I don't think it's the problem of what we do as much as our title. Because the fact is, our job is to ensure that the accrediting commissions are following federal policy.

And we're driven really by statute,
not even regulation. So, it's pretty specific what our staff has to check off. And our job is to evaluate, you know, the nuances, supposedly, between the staff analysis and what we understand from an educational perspective.

But, I don't disagree with you. I mean, I'd love to see us be able to discuss the quality of the accreditation process, which we don't do.

And, in fact, we could ask maybe within our process to have the - in the beginning, instead of just talking about the checklist items - have the members like we kind of did, and what they thought about the policies, you know, where they were kind of a preamble to the presentation, explain why they are an agency that assures quality, and have them explain it to us in their own words, and see - it would be interesting to see how we react to that.

CHAIR PHILLIPS: Jill?

DR. DERBY: Well, I think Frank has
laid out exactly what it is we do, but help me understand, because I had thought in the statute we also are asked to advise the Secretary.

Doesn't that broaden our opportunity and our role in a way that we could move more in that direction? And it is within the scope, it just isn't within the practice of what we've done in the past.

CHAIR PHILLIPS: It's certainly not in the practice of the - our meeting time.

DR. DERBY: Right.

CHAIR PHILLIPS: On the other hand, with the exception of this meeting in particular, where we've had a very light review agenda, the agency review has been voluminous, in part because of the backlog.

So, in some ways there's been a clock ticking on the actions that need to be taken with respect to agencies, and less so a clock ticking on policy. George?

DR. FRENCH: Madam Chair, I just
wanted to revisit something I just heard Jill speak to, and Arthur earlier, and it has to do with the question that I asked to the accreditors earlier about their view on this whole scorecard and ratings system.

And Art is really onto something that also goes back to what Tom was talking about, affordability. Because we're talking about essentially being what Jill just said, serving in an advisory capacity to the secretary, yet we have what could be a cataclysmic occurrence that could be imminent in that we talk about that we can't decouple.

We can't separate accreditation from financial aid access. But, yet we have an administration that right now is talking about doing just that through a scorecard process.

Whereas the accrediting bodies have been doing this for over 100 years, and we're saying, "Well, we're going to allow the coupling to remain in existence. The accreditors, we have full confidence in their
abilities to make assessments of these colleges
and these universities."

But, now we have, in one fell swoop, an administration and a group of bureaucrats who have gotten together and are deciding that certain schools are not going to be financial aid eligible if colleges don't meet this.

And I think that NACIQI, as an advisement organization body to the Secretary needs to be at the table somewhere to have some view about this, because no one is really speaking up.

CHAIR PHILLIPS: Agreed, and I think that as the ratings system conversation unfolds, the relationship between aid eligibility and the ratings system isn't fully clear. But, it might go this way; it might go that way.

I want to just toss something else onto the table since we've taken our four buckets and merged them. I want to just reflect for a moment on the extent to which the
four of the major buckets that we've talked about, simplification, nuance, money and quality, and NACIQI role, are what I'll call reactive.

They are responding to what has happened in the past. And the questions of access, innovation, and affordability are clearly, you know, part of the very recent drum beat, and the drum beat that we hear coming ahead.

There's another drum beat that I hear. I heard a little bit in this - in these hearings, but I certainly hear in my education walks, which I haven't heard us address, and that is the recognition of quality in all of the venues, and providers, and alternative locations in which it is now occurring.

If there was another thing that I would say happened since 2012 to now, it would be the expansion of the places and providers of education that - I'm going to refrain from calling it the MOOC effect, but you can think
of that as one example, as well as recognition of other ways of accruing the benefits of education other than the traditional institutional venues.

And that I can imagine that those variations on acquiring knowledge, or skills, or credentials, or whatever you want to call it, would also like to have access to aid eligibility for the students that they train, and that the federal dollar being spent in that way should be spent in a way that you have some confidence in the quality of the product that you're investing in.

And so, that makes me wonder what quality assurance looks like for those venues and strategies for education that are not the traditional institution. I think CHEA has begun to think about this. Do we accredit programs? Do we accredit course? What level? What scope?

What – there was some discussion in the Kevin Carey/Ben Miller paper about
recognition of quality in other kinds of providers and certificates. This is a venue of education that we just—that is just completely coming into the field now, and I wonder about that.

I wonder if it's worth our time thinking about what quality assurance looks like for that. What might we—if Middle States were to seek an expansion of scope beyond institutions to certifications, or courses, what might those criteria look like, just to muddy the waters? John?

DR. ETCHEMENDY: So, I'm just going to express my view on that because this has come up at WASC, Sr. My view is that that way, madness lies, frankly, that is to go down the track of accrediting at a course-based or course level, or some, you know, small level.

I think what we've always done is accredit an institution, and then rely on the institution to make judgments about the quality of the programs it provides, the courses that
it provides, and so forth, and so on.

And if we then - if we or an accreditor were then to take the institution out of the picture and say, "Well, we're going to directly say, you know, that this course - this chemistry course is a legitimate, accredited chemistry course," I think that's a mistake.

I don't think we have the capability. I don't think accreditors have the capability to do that.

CHAIR PHILLIPS: Bobby?

DR. DERLIN: I don't disagree with your statements, John, but I also - I mean, I agree. I think that way madness lies. But, there's also a difference between skipping the institutions that we know are traditionally recognized by accreditors and the fact that we have all kinds of new forms of institutions that are also emerging.

And so, maybe how the - maybe at our comment language bucket, we think about what
our institutional - what are institutions in
our higher education system, in some way?

CHAIR PHILLIPS: So, I just wanted to put
that on the table. Moving back to just
summarizing where we are currently, we've,
after a great deal of discussion, thought about
four, maybe five, areas for development of
policy recommendations. They include the
notion of simplification. That includes
common definitions, data reductions,
structures of accreditation, and zero-based
regulation.

Number two is the notion - adding
the notion of nuance into accreditation and
recognition, something along the lines of
risk-based accreditation or variability in
accreditation.

The connection of money and
quality, big bucket, with the connection
between aid, eligibility, and quality
assurance, and also differential -
possibilities of differential access to aid,
and protection of accreditors.

And fourth, the role of NACIQI, both in creating a more sturdy policy presence for itself, as well as considering its interaction with its tasks and the Department that it interacts. Those are four.

The fifth area is - I'm not quite sure how it functions as an area, but the larger questions of access, innovation, affordability, and quality, and how those emerging issues are addressed as we look forward in this area.

That's what we've got so far capturing. There's a couple of nuances. I wanted to make sure that we understand where the ratings system is going and having some response to it, and wanting to make sure that we're at least informed by, and certainly in sync with, and perhaps guiding the Education Department's use of a ratings system to address the eligibility question.

So, those are - that's sort of where
we are so far. Jill, did you want to add something?

DR. DERBY: I didn't hear your language under number four about, you know, sharing the risk vis-a-vis student loans, the skin in the game. That's there, but I just didn't hear that language.

CHAIR PHILLIPS: It's in number three.

DR. DERBY: In number three?

CHAIR PHILLIPS: It's still on my page.

DR. DERBY: It is?

CHAIR PHILLIPS: Yep. So, again, the idea would be - this is my going, going, gone. The idea would be to take these four/five areas to invite people to participate in a subgroup to work, again, over the summer and into September.

Come up with a draft for NACIQI and public comment to react to, revise, modify, and come back to our December meeting with a
document that's prepared for a more thorough
debate and adoption.

Plan going forward okay? Sound
okay for you?

VICE CHAIR KEISER: Are you
thinking about creating into four
subcommittees or one committee like we did the
last time?

CHAIR PHILLIPS: My thought right
now is to summarize all of this, send it out to
you, see what you would like to sign onto talk
about, and if I get four subcommittees, great.
If I get one subcommittee, great.

I'm not quite sure where people are
standing, whether you want to be on one or
another, and whether or not you'd even want to
indicate that right now. So, that's my
thinking.

It's a fair chunk of stuff to work
on, so it may be that there's four groups that
need to work. There is, obviously, some
overlap, and so, there's some commonality.
Rick, yes?

MR. O'DONNELL: To Arthur's comment about a large percentage of people going - having terms end at the end of September, do you want to set an end of September deadline to ask subcommittees to have completed their work in case some people aren't reappointed?

CHAIR PHILLIPS: You can at least bring your work to completion? Yes.

MR. O'DONNELL: Yeah, because it may be - we may discover then, you know, new members have to start all over, and we'd waste - we'd lost the momentum and the work that was done.

CHAIR PHILLIPS: Yeah. In addition to the turnover of the committee, just to be - to give some context, when we worked through this process in 2010, '11, and ultimately it was finished in '12, all of us were on the committee for that whole time, so we didn't have member turnover at the time.
We'd just been reconstituted as a body. So, the issue of having turnover in the middle of a policy development process is a whole new game.

Second is that in order to get to December, which is our next formal public meeting venue, and to include a period of public comment, and reaction/revision time, we have to have it done before September anyway. So, the practical matter is that this really is a between now and the end of September project.

So, what I would ask each of you to do certainly, and I will include this in the email that goes out, is to consider your ability to devote time to one or more of these projects during that time frame.

It's likely to, if I go back to my notes on what things happened in our prior policy meetings, much of the conversation happens in a conference call medium. So, even if you are on Martha's Vineyard, we can find you.
So, I'm hoping to get that out first of the week next week, and invite your response pretty quickly so we can get work groups together.

If that works as a plan, and I see nodding of heads, I won't take a formal vote on that. But, I would invite a motion to adjourn for now if we're ready to make that move.

VICE CHAIR KEISER: So moved.

CHAIR PHILLIPS: So moved. All right, we are adjourned.

(Whereupon, the above-entitled matter went off the record at 11:56 a.m.)