

## **Report of the Meeting**

### **National Advisory Committee on Institutional Quality and Integrity (NACIQI)**

**December 16-18, 2015**



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Susan D. Phillips Ph.D., Chair



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### **DISCLAIMER**

This report summarizes the deliberations of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) at its December 16-18, 2015 meeting. The NACIQI is an advisory committee established by the Higher Education Opportunity Act of 2008, and is subject to the Federal Advisory Committee Act. This report represents the views of the NACIQI. The report has not been reviewed for approval by the Department of Education, and therefore, the report's recommendations do not purport to represent the views of the Department.



## Executive Summary

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

NACIQI met to carry out its responsibilities to advise the senior Department official with respect to the recognition of accrediting agencies and State approval agencies at its December 16-18, 2015 meeting at the Hilton Old Town Alexandria, 1767 King Street, Alexandria, VA.

NACIQI reviewed the following types of applications at its December 16-18, 2015 meeting:

- one application for initial recognition of an accrediting agency;
- seven applications for renewal of recognition from accrediting agencies;
- four compliance reports from accrediting agencies;
- three applications for renewal of recognition from State agencies for the approval of nurse education;
- four applications for renewal of recognition from State agencies for the approval of public postsecondary vocational education; and
- one notification of a substantive change from a military educational institution.

NACIQI also heard from over forty oral commenters at the meeting. Except for recommendations regarding two accrediting agencies, the Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges, and the American Board of Funeral Service Education, Committee on Accreditation, the NACIQI's recommendations concur with the staff recommendations. NACIQI reviews all information submitted by an agency in support of its petition, as well as the staff analysis and report.

The agenda also included a briefing and discussion about the student achievement criteria currently in the regulations. NACIQI Executive Director Jennifer Hong provided information on the history and implementation of student achievement criteria since the last reauthorization of the HEA in 2008, and introduced data now available on the accreditation website and on College Scorecard.<sup>1</sup> Sally Morgan, Office of General Counsel, provided information on how to approach agency reviews in the context of these data. Undersecretary Ted Mitchell and Deputy Under Secretary delegated the duties of Assistant Secretary for Postsecondary Education Jamienne S. Studley addressed NACIQI regarding the Department's postsecondary initiatives and accreditation executive actions. Following NACIQI's review

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<sup>1</sup> <http://www2.ed.gov/admins/finaid/accred/accreditation.html#Overview>



of agencies for recognition, the Committee continued its discussion of how to frame its policy agenda to inform the agency recognition process and to develop broader perspectives about how accrediting agencies consider data about student achievement.

NACIQI members in attendance for all or part of the meeting included Susan Phillips (Chair), Arthur Keiser (Vice Chair), Kathleen Sullivan Alioto, Simon Boehme, Hank Brown, Jill Derby, Roberta Derlin, John Etchemendy, George French, Anne Neal, Richard O'Donnell, Paul LeBlanc, William Pepicello, Arthur Rothkopf, Cameron Staples, Ralph Wolff, Frank Wu, and Federico Zaragoza. U.S. Department of Education representatives who participated in the meeting included: NACIQI Executive Director and Designated Federal Official Jennifer Hong, Accreditation Director Herman Bounds, Sally Morgan and Donna Mangold (Office of General Counsel), Elizabeth Daggett, Nicole Harris, Valerie Lefor, Charles Mula, Steve Porcelli, and Rachael Shultz.



## **Summary of Agency-Related Actions**

The following agencies were acted on as a consent agenda with the following recommendation:

\*Recommendation: Vote 17-0

Move that the NACIQI recommend that the Assistant Secretary accept the recommendations as stated on the consent agenda for those agencies listed.

### **American Speech-Language-Hearing Association, Council on Academic Accreditation in Audiology and Speech-Language Pathology**

Recommendation: Renew the agency's recognition for five years.

NACIQI Primary Readers: Anne Neal, Kathleen Sullivan Alioto

### **Commission on Massage Therapy Accreditation**

Recommendation: Renew the agency's recognition for five years.

NACIQI Primary Readers: Arthur Rothkopf, Rick O'Donnell

### **Council on Naturopathic Medical Education**

Recommendation: Renew the agency's recognition for five years.

NACIQI Primary Readers: George French, Paul LeBlanc

### **Council on Accreditation of Nurse Anesthesia Educational Programs**

Recommendation: Renew the agency's recognition for two and one-half years.

NACIQI Primary Readers: Arthur Keiser, Hank Brown

### **Kansas State Board of Nursing**

Recommendation: Renew the agency's recognition for a period of four years.

NACIQI Primary Readers: George French, Federico Zaragoza

### **Maryland Board of Nursing**

Recommendation: Renew the agency's recognition for a period of four years.

NACIQI Primary Readers: Frank Wu, Hank Brown

### **New York State Board of Regents, State Education Department, Office of the Professions (Public Postsecondary Vocational Education, Practical Nursing)**

Recommendation: Renew the agency's recognition for a period of four years.

NACIQI Primary Readers: Richard O'Donnell, Arthur Rothkopf

### **Pennsylvania State Board of Vocational Education, Bureau of Career and Technical Education**

Recommendation: Renew the agency's recognition for a period of four years.

NACIQI Primary Readers: Simon Boehme, Jill Derby



The following agencies were acted on using the NACIQI's standard review procedures:

**Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges**

Action for Consideration: Compliance report

Recommendation: Vote 9 - 3 (Recusals: Alioto, Wolff, Wu)

NACIQI recommends that the agency be granted an extension of the continuation of its recognition, for good cause, and that the agency submit a compliance report within six months demonstrating its compliance with sections 602.18(e), 602.20(b), and 602.25(a-e). NACIQI also recommends a limitation to ACCJC's current recognition for accreditation of baccalaureate level programs through the substantive change process to exclude from recognition, for the duration of the good cause extension, any baccalaureate level programs not currently accredited. NACIQI recommends to deny the requested expansion of scope, except with respect to ACCJC institutions currently offering an accredited baccalaureate level degree program so as to permit these institutions to undergo renewal of accreditation using ACCJC's substantive change protocol for the baccalaureate program.

Discussion: NACIQI agrees with adoption of the staff recommendation regarding the non-compliance finding, the limitation to the agency's scope of recognition, and the denial of the agency's request for an expansion to its scope of recognition. However, after discussion with the agency and staff as to whether the agency could come into compliance within six months, the NACIQI voted to grant an extension of the continuation of the agency's recognition, for good cause, and that the agency submit a compliance report within six months demonstrating compliance with the issues identified in the staff analysis.

NACIQI Primary Readers:

Cameron C. Staples, J.D.

Arthur E. Keiser, Ph.D.

Representatives of the Agency:

Barbara A. Beno, President | ACCJC

Steven M. Kinsella, Chair | ACCJC

Krista R. Johns, Vice President for Policy and Research | ACCJC

Steven Y. Winnick, Attorney | Education Counsel LLC

Third Party Commenters:

1. Brice W. Harris | Chancellor, The California Community Colleges Chancellor's Office and Board of Governors of the California Community Colleges
2. Martin Hittelman | Los Angeles Valley College Emeritus Professor of Mathematics, retired member of the California Federation of Teachers
3. Mike Solow | Chemistry Department Chairperson, City College of San Francisco
4. Muriel Parenteau | Department Chair, Disabled Students Programs and Services, City College of San Francisco
5. Tarik Farrar | Instructor, City College of San Francisco. Chair, Department of African American Studies, City College of San Francisco
6. Wendy Kaufmyn | Engineering Instructor, Full Time Tenured, City College of San Francisco
7. Hank Reichman | Professor Emeritus of History, California State University, East Bay; First Vice-President, American Association of University Professors, American Association of



#### University Professors

8. Everardo Gonzalez | CCSF Student & Paraprofessional for San Francisco Unified School District, MEChA de CCSF, City College of San Francisco
9. Karen Saginor | Department Chair and Librarian, Library Learning Resources, City College of San Francisco
10. Abdul Jabbar | Emeritus Professor, City College of San Francisco
11. Itzel Calvo Medina | CCSF student, MEChXA de CCSF, City College of San Francisco
12. Dennis Herrera | City Attorney, City and County of San Francisco
13. John Rizzo | Member, Board of Trustees, City College of San Francisco
14. Ron Galatolo (Designee: Ann Killibrew) | Chancellor, San Mateo County Community College District
15. Tracey Faulkner (Designee: Wendy Kaufmyn | Program Coordinator for the CCSF Family Resource Center, City College Of San Francisco, Student Parents United
16. Jonathan Lightman | Executive Director, Faculty Association of California Community Colleges
17. Allen-Deon Saunders | Network Engineer, Student at the City College of San Francisco
18. Jeremy Nolan (Designee: Evarardo Gonzalez) | Oldest brother/man of the house, daycare provider, house painter, cashier, student, City College of San Francisco, MEChA De CCSF
19. Tim Killikelly | Professor/AFT 2121 President, AFT Local 2121, City College of San Francisco San Francisco Labor Council; AFL-CIO; California Federation of Teachers; American Federation of Teachers
20. Lilliam Marrujo-Duck | President, Academic Senate, City College of San Francisco
21. Alisa Messer | English faculty, City College of San Francisco, American Federation of Teachers, Local 2121; San Francisco Labor Council; AFL-CIO; California Federation of Teachers; American Federation of Teachers
22. Martin Madrigal | CCSF Alumni & Transfer Student to San Jose State University, MEChA de CCSF & Save CCSF Coalition, City College of San Francisco
23. Jas V Murray (Designee: Win Mon Kyi) | Student/Childcare, CCSF/ Black Student Union
24. Jennifer Shanoski | Chemistry Instructor, Merritt College
25. Tim Nader (Designee: John Rizzo) | Board Member, Southwestern Community College District, Southwestern Community College District
26. Li Lovett (Designee: Molly Chlebuikow) | Academic Counselor, City College of San Francisco
27. Julia Retzlaff | Student, filmmaker, Save CCSF, SFSU
28. Rafael Mandelman | President of the Board of Trustees of City College of San Francisco, City College of San Francisco
29. Vivek Narayan | Vice President of Administration of the Associated Students of CCSF at Ocean Campus, Executive Council of the Associated Students of CCSF, Associated Students of CCSF
30. Christine Hanson | Equine Body Worker, City College of San Francisco
31. Rodger Scott | Community College Instructor, City College of San Francisco, AFT Local 2121
32. Jeff Freitas | Secretary Treasurer and Ca Math Teacher, California Federation of Teachers, AFT, AFL-CIO
33. Aracelli Rojas Nunoz (Designee: Itzel Calvo Medina) | Student, MECHXA de CCSF, SAVE CCSF



- 34. Carol Sanderson (Designee: Lillian Marrujo-Duck) | Speech Therapist, City College of San Francisco, Family Resource Center
- 35. Win-Mon Kyi | CCSF Student, Asian Student Union CCSF, City College of San Francisco
- 36. Anita Grier | Community College Instructor, City College of San Francisco, Save-CCSF Coalition
- 37. Dr. M.A. Okana | President, Guam Community College
- 38. Dr. Raul Rodriguez | Rancho Santiago Community College District
- 39. Ian Walton | Retired Professor
- 40. Anthony Babauta | Former Assistant Secretary, U.S. Department of the Interior
- 41. Colette Marie McLaughlin | Gavilan College

**New York State Board of Regents, State Education Department, Office of the Professions (Nursing Education)**

Action for Consideration: Renewal of recognition

Recommendation: Vote 17 - 0

Move that the NACIQI recommend to continue the agency's current recognition and require the agency to come into compliance within 12 months, and submit a compliance report 30 days after the 12 month period that demonstrates the agency's compliance with the issue identified in the report.

Discussion: NACIQI concurred with the staff recommendation.

NACIQI Primary Readers:

Roberta L. Derlin, Ph.D.

Simon Boehme

Representative of the Agency:

William Murphy | Bureau Chief, Professional Education | Office of Professions | NYS Education Department

Renee Gecsed | Associate in Nursing Education | Professional Education Program Review  
Office of Professions | NYS Education Department

**Northwest Commission on Colleges and Universities**

Action for Consideration: Compliance report

Committee Recommendation: Vote 15 - 2

NACIQI recommends to accept the compliance report and continue the agency's recognition until the Department reaches a final decision regarding the outcome of the compliance report on sections 602.24(a) and 602.24(b) in response to the Secretary's appeal decision, which is due January 11, 2016.

Discussion: NACIQI concurred with the staff recommendation.

NACIQI Primary Readers:

Arthur J. Rothkopf, J.D.

Federico Zaragoza, Ph.D.

Representative of the Agency:

Dr. Sandra E. Elman, President | NWCCU

Dr. Pamela Goad, Vice President | NWCCU

General Thomas R. Case, Chancellor, University of Alaska Anchorage

Third Party Commenters:

1. Dr. Gregory Scholtz | American Association of University Professors



2. Dr. David Delehanty | Professor of Biology, Idaho State University
3. Dr. Mikle Ellis | Faculty Member, Idaho State University
4. Dr. Philip Cole | Professor, Department of Physics, Idaho State University
5. Dr. Jack Longmate | Adjunct/Part-time Instructor, Olympic College
6. Dr. Jack Longmate for Dr. Keith Hoeller | Co-founder, Washington Part-Time Faculty Association, Faculty Member, Green River College

### **Association of Institutions of Jewish Studies**

Action for Consideration: Initial recognition

Committee Recommendation: Vote 17 - 0

NACIQI recommends to grant initial recognition for a period of five years for the accreditation of postsecondary institutions of Jewish Studies within the United States exclusively offering educational programs leading to a certificate, associate degree, baccalaureate degree or their equivalent credential in Jewish Studies or Classical Torah Studies.

Discussion: NACIQI concurred with the staff recommendation.

NACIQI Primary Readers:

John Etchemendy, Ph.D.

William Pepicello, Ph.D.

Representative of the Agency:

Rabbi Moshe Zev Weisberg | AIJS

Mrs. Elisheva Kahan | AIJS

Rabbi Alex Lowinger | AIJS

Mrs. Naomi Landesman | AIJS

Dr. Leslie Klein | WITS

Dr. C. Cohen | AIJS

Mr. Sam Brown, Esq.

### **United States Air Force Institute of Technology, Graduate School of Engineering and Management**

Action for Consideration: Notification of degree modification

Committee Recommendation: Vote 17 – 0 (Recusals: Derlin)

Accept the report.

Discussion: NACIQI concurred with the staff recommendation, with no additional comments.

NACIQI Primary Readers:

Arthur E. Keiser, Ph.D.

Cameron C. Staples, J.D.

Representative of the Agency:

Dr. Paul J. Wolf, Associate Dean for Academic Affairs | Air Force Institute of Technology, Graduate school of Engineering and Management

### **Accreditation Commission for Education in Nursing, Inc.**

Action for Consideration: Compliance report

Committee Recommendation: Vote 12 – 0 (Recusals: Pepicello, Zaragoza, Derlin)

NACIQI recommends to renew the agency's recognition for a period of one and a half years.

Discussion: NACIQI concurred with the staff recommendation.



NACIQI Primary Readers:

Jill Derby, Ph.D.

Frank H. Wu, J.D.

Representative of the Agency:

Marilyn Brady, PhD, RN, Dean of Nursing/Chair | ACEN Board of Commissioners, Trident Technical College

Pat McKee, Managing Partner | McKee & Mitchell LLC

Marsal Stoll, EdD, MSN, Chief Executive Officer | ACEN

**American Board of Funeral Service Education, Committee on Accreditation**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 14 – 0; 1 abstention

NACIQI recommends to continue the agency's current recognition and require the agency to come into compliance within 12 months, and submit a compliance report 30 days after the 12 month period that demonstrates the agency's compliance with the issues identified in the report, as well as an additional finding under section 602.20(a).

Discussion: NACIQI concurred with the staff recommendation, but added an additional finding from their review under section 602.20(a).

NACIQI Primary Readers:

Simon Boehme

Ralph Wolff, J.D.

Representative of the Agency:

Robert C. Smith III, Executive Director | ABFSE

Venus R. Smith, Committee on Accreditation – Chairperson | ABFSE

Eugene Ogrodnik, President | ABFSE

Steven Spann, President | ABFSE

Billie Watson Hughes | ABFSE

**National Accrediting Commission of Career Arts and Sciences, Inc.**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 13 – 0; 2 abstention

NACIQI recommends to renew the agency's recognition for five years.

Discussion: NACIQI concurred with the staff recommendation.

NACIQI Primary Readers:

Anne D. Neal, J.D.

Ralph Wolff, J.D.

Representative of the Agency:

Anthony Mirando, Executive Director | NACCAS

Darin Wallace, Director of Governmental Affairs and Legal | NACCAS

Third Party Commenters:

1. Deana Labriola, Attorney, Ward & Smith, P.A. and General Counsel for Park West Barber School

**Puerto Rico State Agency for the Approval of Public Postsecondary Vocational, Technical Institutions and Programs**



Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 15 – 0

NACIQI recommends to defer the agency's application until the next NACIQI meeting.

Discussion: NACIQI concurred with the staff recommendation.

NACIQI Primary Readers:

Jill Derby, Ph.D.

Richard F. O'Donnell

Representative of the Agency:

### **Midwifery Education Accreditation Council**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 14 – 0

NACIQI recommends to continue the agency's current recognition and require the agency to come into compliance within 12 months, and submit a compliance report 30 days after the 12 month period that demonstrates the agency's compliance with the issues identified in the report.

Discussion: NACIQI concurred with the staff recommendation.

NACIQI Primary Readers:

Kathleen Sullivan Alioto, Ed.D.

George T. French, Ph.D.

Representative of the Agency:

Tracy Vilella Gartenmann, Executive Director | MEAC

Kristi Ridd-Young, Vice-President | MEAC

Karin Borgerson, Associate Director | MEAC

Sandra Bitonti Stewart, Project Consultant | MEAC

### **Montessori Accreditation Council for Teacher Education**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 14 – 0

NACIQI recommends to continue the agency's current recognition and require the agency to come into compliance within 12 months, and submit a compliance report 30 days after the 12 month period that demonstrates the agency's compliance with the issues identified in the report.

Discussion: NACIQI concurred with the staff recommendation.

NACIQI Primary Readers:

Roberta L. Derlin, Ph.D.

Paul J. LeBlanc, Ph.D.

Representative of the Agency:

Dr. Rebecca Pelton | President | MACTE

Dr. Cassie Bradshaw | VP for Accreditation | MACTE

### **Oklahoma Department of Career & Technology**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 14 – 0



NACIQI recommends to continue the agency's current recognition and require the agency to come into compliance within 12 months, and submit a compliance report 30 days after the 12 month period that demonstrates the agency's compliance with the issues identified in the report.

Discussion: NACIQI concurred with the staff recommendation.

NACIQI Primary Readers:

William Pepicello, Ph.D.

Federico Zaragoza, Ph.D.

Representative of the Agency:

Dr. Marcie Mack, State Director | OK-CTE

Dawn Lindsley, Accreditation Coordinator | OK-CTE

## **STAFF BRIEFING ON STUDENT ACHIEVEMENT**

NACIQI Executive Director Jennifer Hong and Sally Morgan, Office of General Counsel, provided a training session to NACIQI members regarding criteria pertaining to student achievement, and the implementation and interpretation of student achievement criteria. Jennifer Hong also reviewed information and data regarding accrediting agencies provided by the Department and that is currently available on the accreditation website. Sally Morgan provided guidance to members on the parameters of the discussion of student achievement measures in light of the data and information provided by the Department.

## **COLLEAGUE BRIEFING ON STUDENT ACHIEVEMENT**

Judith Eaton, President of the Council for Higher Education Accreditation (CHEA), briefed members on the scope of CHEA's recognition process, as well as how the organization reviews accrediting agencies' requirements for student achievement. CHEA recognition requires accrediting agencies to have a policy for their institutions and programs to provide reliable evidence to the public about the performance of an institution or program including student achievement.

## **DEPARTMENT UPDATES**

On Friday, December 18, 2015, Undersecretary Ted Mitchell presented to the NACIQI regarding the Department's postsecondary initiatives. Undersecretary Mitchell was joined by Deputy Under Secretary delegated the duties of Assistant Secretary for Postsecondary Education Jamienne Studley.

Undersecretary Mitchell noted that much of the Department's work in this area over the last year and a half has been a focus on outcomes, that is, completion, placement rates, and other data. He discussed how the administration is continuing to focus on increasing access, affordability, and quality through various initiatives, particularly for historically marginalized groups, or those with growing needs for higher education, including displaced workers, returning veterans, and single parents.

Undersecretary Mitchell highlighted department work with respect to reducing cost and debt; income-driven repayment plans; the enforcement of regulations such as gainful employment; and newly available information available to prospective students via the College Scorecard.



In addressing the Department's work with regard to innovation, Undersecretary Mitchell noted that the Department has embarked on a set of experiments to use Federal financial aid in different ways to promote experimentation to lead to the identification of good practice which will in turn inform policy changes. Current experiments include making Pell grants available to incarcerated men and women; competency-based education; incentivizing new providers to enter the marketplace in collaboration with institutions of higher education; prior learning assessments; and dual enrollment.

Undersecretary Mitchell proposed working in partnership with NACIQI on accreditation-related issues, and reviewed the accreditation-related executive actions which are intended to focus attention on outcomes and increase transparency into the accreditation process. The five actions include publishing accreditor's standards for evaluating student outcomes; requiring agencies to provide decision letters for institutions placed on probation; increasing information-sharing about institutions of concern; publishing student and institutional metrics for postsecondary institutions by accreditor; and encouraging NACIQI to attend to outcomes when accreditors come up for review. In addition to the executive actions, the Department has advanced legislative proposals include focusing more on outcomes; allowing the Department to create a differentiated system of recognition of accreditors; requiring accreditors to mandate robust teach-out plans; establishing standard common terms and definitions for accreditors; and making more accreditation materials available to the public.

After his presentation, Undersecretary fielded several questions from NACIQI members.

#### **NACIQI POLICY AGENDA – COMMITTEE DISCUSSION**

NACIQI continued its policy discussion in the context of staff and colleague briefings on student achievement, and Undersecretary Mitchell's presentation. Members discussed how to incorporate information and data elements concerning student achievement within the materials provided by the staff, as well as to develop a set of questions and inform accreditors to be prepared to answer such questions at the time of their review. Chairperson Phillips posted an aspirational outline, including student achievement standards and rationale, routine data about the activity and overall metrics of accredited institution, and strategies used to identify and assist institutions at risk. The Committee members voted 9-0 to adopt this framework as a starting point for the June 2016 meeting, subject to further refinement and review. This document is available on the NACIQI website.<sup>2</sup>

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<sup>2</sup> <http://www2.ed.gov/about/bdscomm/list/naciqi.html#charter>