

Report of the Meeting

National Advisory Committee on Institutional Quality and Integrity

March 23, 2015



/s/

Susan D. Phillips, Chair

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DISCLAIMER

This report was written as a part of the activities of the National Advisory Committee on Institutional Quality and Integrity (NACIQI), an independent advisory committee established by statute. The NACIQI is subject to the Federal Advisory Committee Act and the regulations implementing that statute. 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.

Background:

The National Advisory Committee on Institutional Quality and Integrity (NACIQI or the Committee), was established by Section 114 of the Higher Education Act (HEA) of 1965, as amended by the Higher Education Amendments of 1992 and, most recently, Section 106 of the Higher Education Opportunity Act (HEOA). The HEOA made changes to section 496 of the HEA “Recognition of Accrediting Agency or Association” and suspended the activities of the NACIQI upon enactment on August 14, 2008. It also changed the composition of the Committee by increasing the membership from 15 to 18 and shifting appointment authority that had been vested solely in the Secretary to the Secretary, the President pro tempore of the Senate, and the Speaker of the House, each of whom may appoint six members. Also, rather than having the Secretary appoint the Chair, the HEOA required the members to elect a Chair. In July 2010, new regulations went into effect that govern the process by which accrediting agencies seek recognition by the Secretary as a reliable authority regarding the quality of education and training provided by an institution (or program) they accredit.

Chief among its statutory functions is the Committee’s responsibility to advise the Secretary of Education, or his designee, the Senior Department Official (the Assistant Secretary for Postsecondary Education), regarding the recognition of specific accrediting agencies or associations, or specific State approval agencies, as reliable authorities concerning the quality of education and training offered by the postsecondary educational institutions and programs they accredit. Another function of the NACIQI is to advise the Secretary on the establishment and enforcement of the Criteria for Recognition of accrediting agencies or associations under Subpart 2, Part H, Title IV, of the HEA. The NACIQI also provides advice to the Secretary regarding policy affecting both recognition of accrediting and State approval agencies and institutional eligibility for participation in programs authorized under Title IV of the Higher Education Act of 1965, as amended. The NACIQI is required by law to meet at least twice a year.

Discussion:

A virtual meeting of the Committee was coordinated by the Department and conducted on March 23, 2015. The purpose of the virtual meeting was to enable the Committee to deliberate and adopt a report of recommendations for the Secretary to inform the reauthorization of the HEOA.

Dr. Susan D. Phillips, Chair, called the meeting to order at approximately 1:00 p.m. eastern time.

Roll call was taken. NACIQI members in attendance for all or part of the meeting included Susan D. Phillips (Chair), Arthur E. Keiser (Vice Chair), Simon Boehme, Jill Derby, Roberta Derlin, John Etchemendy, Anne D. Neal, Richard F. O’ Donnell, William Pepicello, Arthur J. Rothkopf, Cameron C. Staples, Frank H. Wu, and Federico Zaragoza.

U.S. Department of Education personnel who also participated in the meeting included: Committee Executive Director Carol Griffiths, Program Attorney Sarah Morgan, and Program and Management Analyst staff member, Patricia Howes.

In response to the Federal Register Notice solicitation for public comments, the Committee heard an oral presentation by Mollie Benz Flounlacker, Associate Vice President for Federal Relations, Association of American Universities.

At the conclusion of the oral comment, Chair Phillips outlined the motion procedures and responded to procedural questions. It was agreed that each recommendation would be discussed in order and the question called for each recommendation. The Committee discussion and actions proceeded as follows:

Recommendation #1: Vote: 10/0

Discussion: Motion modified the recommendation by deleting the word “Ask” replacing it with the word, “Encourage”.

Encourage accreditation agencies (both programmatic and institutional) to develop common definitions of accreditation actions and terms procedures, timelines, process (i.e., electronic) including due process and substantive change.

Recommendation #2: Vote: 10/0

Discussion: Motion modified the recommendation to incorporate the areas of review, and to add language to convey that the review was not limited to the areas recommended.

Require a periodic Departmental review of the criteria for recognition (regulations) with the intent to streamline the regulations, eliminate duplication, and to minimize the regulatory burden. (This recommendation is not intended to limit Departmental review to these areas.)

Recommendation #3: Vote: 9/2

Discussion: Motion modified the recommendation to delete the word “ensuring” and to replace it with the word “assessing” and to delete the words “and their affordability” from the recommendation.

Re-focus NACIQI reviews to direct greater attention to assessing the role of an accrediting agency in assessing the health and well-being and the quality of institutions of higher education, rather than on technical compliance with the criteria for recognition. These reviews should be supported by staff analysis that focuses on the effectiveness of the accrediting agency in performing its work, rather than technical compliance.

Recommendation #4: Vote: 9/2

Discussion: Motion advanced as stated.

Direct NACIQI to identify the essential core elements and areas of the recognition review process that accrediting agencies are required to take into account for recognition purposes, focusing of student learning and student outcomes. It is expected that NACIQI would identify both the essential areas to include in the recognition process as well as those to exclude.

Recommendation #5: Vote: 10/1

Discussion: Motion advanced as stated.

Grant accrediting agencies greater authority to develop standards tailored to institutional mission; to create different substantive tiers of accreditation; and to use different processes for different types of institutions, including expedited processes.

Recommendation #6: Vote: 11/0

Discussion: Motion combined recommendations #6 and #7 based on their relationship - NACIQI or the departmental - review rather than what is the accrediting process. The word “objective” was added between the words “different” and “graduations” of approval (recognition) of accrediting agencies.

Establish that the recognition review process differentiate among accrediting agencies based on risk or need with some identified as requiring greater levels of attention, and others lesser and establish that recognition recommendations and decisions include different objective gradations of approval of accrediting agencies and different recommendations as to the amount of time within which an agency is allowed to achieve compliance.

Recommendation #7: Vote: 11/0

Discussion: Motion advanced as stated.

Make accreditation reports about institutions available to the public. Further discussion is needed about what reports to include, and about how to increase information and transparency while sustaining other critical values in the accreditation process.

Recommendation #8: Vote: 11/0

Discussion: Motion added the phrase “including all placed-based accreditors” to the first sentence of the recommendation and combined recommendations # 9 and #10.

Afford institutions the widest possible array of choice of accreditor, for access to Title IV funds including all placed-based accreditors. Encourage place-based accreditation agencies to expand their scope. Provide greater flexibility for institutions to re-align themselves along sector, institution-type, or other appropriate lines. Allow for alternative accrediting organizations.

Recommendation #9: Vote: 10/1

Discussion: Motion advanced as stated.

Establish less burdensome access to Title IV funding for high-quality, low-risk institutions.

At approximately 3:00 pm the Committee reevaluated its quorum and concluded that adjournment was necessary. With six recommendations (12, 13, 14, 15, 16 and 17) to be discussed, the options before the Committee are to pursue the possibility of scheduling another virtual meeting in late May and if this is not possible, to defer further action on the policy recommendations until the NACIQI's next meeting to be held June 25-26 2015, in the Washington DC area.

Meeting adjourned at 3: 10pm.