

U.S. DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

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NATIONAL ADVISORY COMMITTEE ON
INSTITUTIONAL QUALITY AND INTEGRITY

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TUESDAY
JULY 19, 2022

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The Advisory Committee met via
Videoconference, at 10:00 a.m. EST, Arthur E.
Keiser, Chair, presiding.

ADVISORY COMMITTEE MEMBERS PRESENT

ARTHUR E. KEISER, Chair
CLAUDE PRESSNELL, Vice Chair
KATHLEEN SULLIVAN ALIOTO
JENNIFER L. BLUM, ESQ.
WALLACE E. BOSTON
ROSLYN CLARK ARTIS
JILL DERBY
DAVID EUBANKS
MOLLY HALL MARTIN
D. MICHAEL LINDSAY
ROBERT MAYES
MARY ELLEN PETRISKO
ROBERT SHIREMAN
ZAKIYA SMITH ELLIS

STEVEN VAN AUSDLE

DEPARTMENT OF EDUCATION STAFF PRESENT
GEORGE ALAN SMITH, NACIQI Executive Director,
Designated Federal Official
HERMAN BOUNDS, Director, Accreditation Group
LG CORDER
ELIZABETH DAGGETT
PAUL FLOREK
NICOLE S. HARRIS
CHARITY HELTON
REHA MALLORY SHACKELFORD
DONNA MANGOLD
STEPHANIE McKISSIC
KARMON SIMMS-COATES
MICHAEL STEIN

NEW YORK STATE BOARD OF REGENTS, STATE EDUCATION
DEPARTMENT, OFFICE OF THE PROFESSIONS, PUBLIC
POSTSECONDARY VOCATIONAL EDUCATION, PRACTICAL
NURSING (NYBRVE)
JEANNE-MARIE HAVENER, Associate in Nursing
Education
CASEY SCHENK, Associate in Nursing Education

DISTANCE EDUCATION ACCREDITING COMMISSION (DEAC)
CHERYL HAYEK, Chair
LEAH MATTHEWS, Executive Director
JULIE MICELI, Counsel
WANDA NITSCH, Vice Chair

AMERICAN OCCUPATIONAL THERAPY ASSOCIATION,
ACCREDITATION COUNCIL FOR OCCUPATIONAL THERAPY
EDUCATION (ACOTE)
TERESA BRININGER, Director of Accreditation
LYNN KILBURG, Chairperson

ASSOCIATION FOR CLINICAL PASTROAL EDUCATION,
INC., ACCREDITATION COMMISSION (ACPEI)
RANDY HALL, Chair
TRACE HAYTHORN, CEO/Executive Director
MARC MEDWED, Associate Executive Director
KATY WILCOX, Chair-Elect

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1 P-R-O-C-E-E-D-I-N-G-S

2 10:00 a.m.

3 G.A. SMITH: Good morning and welcome,
4 everyone.

5 This is the meeting of the National
6 Advisory Committee on Institutional Quality and
7 Integrity, also known as NACIQI.

8 I'm George Alan Smith, the executive
9 director and designated federal official of
10 NACIQI.

11 NACIQI was established by Section 114
12 of the Higher Education Act of 1965, as amended.
13 And is also governed by provisions of the Federal
14 Advisory Committee Act, as amended which sets
15 forth standards for the formation and the use of
16 advisory committees.

17 Sections 101C and 487C-4 of the HEA
18 and Section 8016 of the Public Health Service
19 Act, 42USD Section 2966 requires a secretary to
20 publish lists (Audio interference.) agencies,
21 nationally recognized accrediting agencies, and
22 state approval and accrediting agencies for

1 programs of nurse education that the secretary
2 determines to be reliable authorities (Audio
3 interference.) quality of education provided by
4 the institutions and programs they accredit.

5 Eligibility of educational
6 institutions and programs for participating in
7 various federal programs requires accreditation
8 by an agency listed by the Secretary.

9 As provided in HEA Section 114, NACIQI
10 advises the secretary in the discharge of these
11 functions, and is also authorized to provide
12 advice regarding the process of eligibility and
13 certification of institutions of higher education
14 for participation in the Federal Student Aid
15 programs authorized under Title IV of the HEA.

16 Further, in addition to these charges,
17 NACIQI authorizes academic graduate degrees from
18 federal agencies and institutions. This
19 authorization was provided by letter from the
20 Office of Management and Budget in 1954. And
21 this letter is available on the NACIQI website
22 along with all other records related to NACIQI's

1 deliberations.

2 Thank you for joining us today, and
3 I'll turn today's meeting over to the
4 Chairperson, Art Keiser.

5 CHAIR KEISER: Well good morning,
6 everyone and welcome to the summer of 2022
7 meeting of the National Advisory Committee on
8 Institutional Quality and Integrity.

9 First I'd like to introduce the
10 members of our committee and then I would have
11 George and Herman introduce the members of their
12 staff. Let's start with Molly.

13 M. HALL-MARTIN: (Native language
14 spoken.) I'm Molly Hall-Martin and I currently
15 serve as the student member.

16 CHAIR KEISER: Thank you, Molly.
17 David?

18 D. EUBANKS: Morning, everyone. David
19 Eubanks, I work at Furman University.

20 CHAIR KEISER: Robert?

21 R. MAYES: Good morning. I'm Robert
22 Mayes, CEO of Columbia Southern Education Group,

1 the parent company of Waldorf University and
2 Columbia Southern University.

3 CHAIR KEISER: Roslyn?

4 R. ARTIS: Good morning. Roslyn Clark
5 Artis, President of Benedict College in Columbia,
6 South Carolina.

7 CHAIR KEISER: Mary Ellen?

8 M.E. PETRISKO: Mary Ellen Petrisko,
9 Vice President of the WASC Senior College and
10 University Commission.

11 CHAIR KEISER: Wally?

12 W. BOSTON: Wally Boston, President
13 Emeritus of American Public University System.

14 CHAIR KEISER: Jennifer?

15 J. BLUM: Jennifer Blum, I manage a
16 higher ed policy consulting firm.

17 CHAIR KEISER: Kathleen?

18 (No audible response.)

19 CHAIR KEISER: You're muted, Kathleen.

20 K.S. ALIOTO: Kathleen Sullivan
21 Alioto, now advocate for the most critical moment
22 in someone's development, birth to three.

1 CHAIR KEISER: Claude?

2 VICE CHAIR PRESSNELL: Claude

3 Pressnell, serve as the President of the
4 Tennessee Independent Colleges and Universities,
5 and Vice Chair of the Committee.

6 CHAIR KEISER: Steve?

7 S. VAN AUSDLE: Steve Van Ausdle,
8 President of the Emeritus Walla Walla Community
9 College in Washington state.

10 CHAIR KEISER: Zakiya, our newest
11 member?

12 Z. SMITH ELLIS: Hello. Zakiya Smith
13 Ellis, former Chief Policy Advisor to Governor
14 Murphy in New Jersey, and student advocate.

15 CHAIR KEISER: Michael?

16 M. LINDSAY: I'm Michael Lindsay, I
17 serve as the President of Taylor University in
18 Indiana.

19 CHAIR KEISER: Jill?

20 J. DERBY: I'm Jill Derby, a Senior
21 Fellow with the Association of Governing Boards
22 of Universities and Colleges.

1 CHAIR KEISER: And Bob?

2 B. SHIREMAN: Bob Shireman, I'm the
3 Senior Fellow and Director of the Higher
4 Education Program at the Century Foundation.

5 CHAIR KEISER: And I'm Arthur Keiser,
6 I am the current Chair of NACIQI, and I am
7 Chancellor of Keiser University in Fort
8 Lauderdale, Florida.

9 So George and Herman, would you please
10 introduce your staffs?

11 G.A. SMITH: I'm joined today with
12 Monica Freeman who supports the work of the
13 NACIQI, also Donna Mangold, Angela Sierra, and
14 Soren Lagaard who are representing OGC.

15 So I'll now turn it over to Herman.

16 H. BOUNDS: Good morning. My name is
17 Herman Bounds, and I am the Director of the
18 Accreditation Group at the Department of
19 Education.

20 And I'll introduce my staff, Elizabeth
21 Daggett and Reha Mallory are out today, they're
22 not able to attend so we will start with Nicole

1 Harris. Nicole, would you please introduce
2 yourself?

3 (No audible response.)

4 CHAIR KEISER: We can't hear you,
5 Nicole.

6 H. BOUNDS: I know she's there --
7 we'll go on and maybe she can come in later, I
8 guess, when she adjusts her audio. Stephanie
9 McKissic?

10 S. McKissic: Good morning. I'm Dr.
11 Stephanie McKissic and I'm with the Accreditation
12 Group.

13 H. BOUNDS: Charity Helton?

14 (No audible response.)

15 CHAIR KEISER: We cannot hear you,
16 Charity, either.

17 H. BOUNDS: Okay, we'll move on to --
18 I hope they are ready when their presentations
19 are ready. Karmon Simms-Coates, Kar, could you
20 introduce yourself?

21 K. SIMMS-COATES: Good morning. My
22 name is Karmon Simms-Coates and I with the

1 Accreditation Group.

2 H. BOUNDS: Mike Stein?

3 M. STEIN: Good morning. My name is
4 Mike Stein, and I'm also with the Accreditation
5 Group.

6 H. BOUNDS: L.G.?

7 L. CORDER: Morning. L.G. Corder, I'm
8 an analyst with the Accreditation Group.

9 H. BOUNDS: And Paul Florek?

10 P. FLOREK: Good morning.

11 Accreditation Group.

12 H. BOUNDS: All right, Art, that is it
13 for us.

14 CHAIR KEISER: Thank you, everybody,
15 we're very lucky to have such a talented staff.

16 It is now my honor and pleasure to
17 introduce Undersecretary James Kvaal. James
18 Kvaal formerly served as President of the
19 Institute of College Excellence and Success, or
20 TICAS, a research and advocacy non-profit
21 dedicated to affordability and equity in higher
22 education. TICAS is nationally recognized for

1 its research and policy recommendations on
2 student debt.

3 Secretary Kvaal served in the Obama
4 administration as the Deputy Domestic Policy
5 Advisor at the White House, and Deputy
6 Undersecretary of the U.S. Department of
7 Education. He led efforts to cut student loan
8 monthly payments, hold career colleges
9 accountable for excessive debt, and community
10 colleges tuition-free.

11 He helped organize the White House
12 Summit on College Opportunity which featured more
13 than 100 college presidents and other leaders,
14 committing to actions to help more students
15 graduate from college. He also served in senior
16 roles in the U.S. House of Representatives and
17 the U.S. Senate.

18 Secretary Kvaal taught at the
19 University of Michigan's Ford School of Public
20 Policy, and graduated with honors from Stanford
21 Universities and Harvard Law School.

22 Please welcome with me, Secretary

1 James Kvaal.

2 J. KVAAL: Thank you, Art. Thanks
3 very much for the kind introduction and for the
4 chance to be here with all of you this morning,
5 it's a honor for me to join you again and to help
6 kick off this July 2022 meeting of the National
7 Advisory Committee on Institutional Quality and
8 Integrity.

9 I have said it before, and I'm sure
10 I'll say it again, but accreditors in NACIQI are
11 essential partners to us in both, quality
12 assurance and quality improvement. And both, the
13 assurance and improvement are important parts of
14 building the higher education system that we
15 want.

16 I want to say thank you to the staff
17 here at the department that have worked very hard
18 to prepare for this meeting, including Herman,
19 George, Donna, Angela, Soren, thank you for all
20 of your hard work. I know we have nine agencies
21 up for review at this meeting and this is the
22 first time that agencies have been reviewed under

1 the 2019 regulations and all that regulatory
2 criteria, so this was no small feat and I want to
3 say thank you for the work that's made these
4 conversations possible.

5 I'd also like to welcome our newest
6 NACIQI member, Dr. Zakiya Smith Ellis. As Art
7 said, Dr. Ellis was recently a chief policy
8 advisor to the Governor of New Jersey, she served
9 as the State Secretary of Higher Education and in
10 many other roles, including some here at the
11 department. So we're all very lucky to have your
12 expertise on the committee, Zakiya.

13 NACIQI plays an important role in
14 advising the secretary on the role of
15 accreditation and the recognition of accrediting
16 agencies, and we greatly appreciate all of you
17 volunteering your expertise and your time to this
18 really important project.

19 I'd just like to provide a couple of
20 updates about recent work happening here at the
21 department and where we're headed. Two weeks ago
22 the department released published regulations --

1 proposed regulations for public comment on a set
2 of issues facing student loan borrowers. And
3 this proposal is part of the Biden-Harris
4 Administration's continued commitment to make the
5 student loan programs work, to fix long-standing
6 problems in the programs, and to ensure that
7 students and borrowers get the benefits they're
8 entitled to.

9 So the regulatory proposal would
10 simplify and expand eligibility for borrower
11 defense, public service loan forgiveness, total
12 and permanent disability, and other critical
13 forgiveness programs. And that builds upon our
14 efforts to get relief to eligible students that
15 have helped discharge the loans of 1.3 million
16 borrowers so far.

17 The proposed regs would also
18 substantially reduce compound interest which
19 drives many borrowers deeper into debt, even as
20 they are making their payments.

21 We are also working to prevent a
22 future debt crises by holding colleges and

1 universities accountable for leaving students
2 with mountains of debt, and without good jobs.
3 And NACIQI's work is an important compliment to
4 these efforts, your efforts to ensure quality
5 standards and oversight can help, and part of
6 that conversation is facing the facts on how well
7 students are doing.

8 So ahead of today's meeting the
9 department staff updated the accreditor
10 dashboards, I know subcommittee is working hard
11 to think about how to improve these dashboards
12 and how they can be useful to all of you, and my
13 colleagues and I are looking forward to hearing
14 updates on your progress and your
15 recommendations.

16 I also want to mention some new
17 information that we'll be releasing today. And
18 as you know, former regional accreditors are
19 beginning to accredit institutions outside their
20 traditional geographic boundaries, and we welcome
21 the opportunity for institutions to seek out the
22 highest standards and the best fit for their

1 missions. At the same time we would be concerned
2 if colleges were attempting to choose accreditors
3 as a way of evading accountability or high
4 standards.

5 We've seen a new state law that
6 mandates that public institutions switch
7 accrediting agencies before their next
8 accreditation cycle, and I'm concerned that this
9 law will impede the effectiveness of the
10 accreditation process and could even have a
11 chilling effect on accrediting agencies as they
12 seek to effectively carry out their
13 responsibilities.

14 There are provisions in the Higher
15 Education Act and in the department's regulations
16 that provide protections for students and
17 taxpayers against the potential for colleges to
18 shop for accreditors, or, in other words, to seek
19 out new agencies and avoid accountability. This
20 is not a new concern and these protections have a
21 long history.

22 Switching accrediting agencies have

1 long required secretary approval but, given the
2 new risks we're facing today, we at the
3 department took a fresh look at our policies.
4 And we are releasing three new guidance documents
5 that we hope will help inform institutions and
6 accrediting agencies about their responsibilities
7 when institutions are switching accreditors.

8 One letter addresses the process
9 institutions must follow if seeking to switch
10 agencies, this process requires that institutions
11 get approval from the department before they
12 submit an application to a new agency. We've had
13 institutions run into problems because they
14 haven't been fully aware of these requirements,
15 and we want to make sure to avoid that at all
16 costs.

17 Additional guidance addresses the
18 factors the department will consider in these
19 applications, including the institution's full
20 history with its accreditor, its motivation for
21 switching, whether this will result in improved
22 quality for students, and whether the switch is

1 voluntary. We would be very concerned if any
2 institution was switching accreditors in order to
3 evade accountability or high standards.

4 Finally, we are clarifying for
5 accrediting agencies how they should adhere to
6 the long-standing requirement that they have a
7 voluntary membership.

8 These clarifications are intended to
9 ensure that institutions are held to high
10 standards and that an institution subject to
11 oversight cannot simply evade inquiries or action
12 by their current accreditors. And also they will
13 help maintain the integrity of the federal triad
14 and preserve accrediting agencies' role in that
15 oversight so that a state can't undermine an
16 accrediting agency's authority, and institutions
17 are not forced to switch agencies against their
18 will simply because an accrediting agency
19 enforced it's standards.

20 We welcome your support to ensure that
21 accreditation does not become a race to the
22 bottom, and ways that we can better evaluate

1 agencies for consistency to ensure that
2 accreditors can carry out their jobs.

3 Before I go I want to say thank you to
4 each of you for your hard work, I know you have a
5 long agenda ahead. We really value your advice
6 and recommendations and the expertise that you
7 share. So thank you, and best wishes for a
8 successful meeting today.

9 PARTICIPANT: Thank you.

10 CHAIR KEISER: Thank you, Secretary
11 Kvaal. We appreciate your comments.

12 We'll now begin the meeting and the
13 first set -- our first responsibility is the
14 consent agenda and the procedures for the consent
15 agenda. The consent agenda will allow for the
16 call of third-party oral comments, we call for
17 the removal of any items from the consent agenda
18 based on recommendations from the committee.
19 We'll move and second the consent agenda,
20 depending on the recommendations of the readers,
21 and then we'll call for a vote on the consent
22 agenda.

1 There's one agency that's on the
2 consent agenda, the New York State Board of
3 Regents, State Education Department, Office of
4 Professions, Public Post-Secondary Vocational
5 Education, Practical Nursing Program -- it's just
6 such a long title, maybe we should deal with that
7 but I'm not sure that's in our purview. The
8 primary leaders are Kathleen Alioto and Steve Van
9 Ausdle, who would like to begin with that?

10 K.S. ALIOTO: Steve and I do not have
11 any problem, the committee actually voted for
12 approval of this agency in February 2020, was it?
13 2020, right when COVID began. And the changes
14 that they have made and the recommendation of the
15 department we agree with. Thank you.

16 S. VAN AUSDLE: And Art, I would say,
17 the staff found no problems with this situation.
18 The only little hiccup was getting some
19 information in a timely fashion, and it appeared
20 that COVID had something to do with that. After
21 the staff analysis, the Agency fully complied and
22 I recommend we leave the institution on the

1 consent agenda.

2 CHAIR KEISER: Okay. This is a little
3 interesting, a little different than we would
4 normally do. Do I need to introduce the people
5 from the Agency, or would you want us just to go
6 to a vote, George? Since I think Steve just made
7 a motion.

8 G.A. SMITH: Yeah, either way is fine
9 but you do have a couple of questions, you've got
10 some hands from Wally and Zakiya, and Bob -- you
11 have three hands.

12 CHAIR KEISER: Okay. Do you have
13 questions for Steve and Kathleen, Wally first,
14 Zakiya second, and Bob?

15 W. BOSTON: Thanks, Art, I do.
16 Kathleen and Steven, I guess when I look at the
17 Agency's recommendation for 18 months on a
18 compliance review, this Agency was on a
19 compliance review from previously and so we're
20 back-to-back with compliance reviews primarily
21 because some of their locations aren't being
22 personally visited. And I'm just curious how you

1 all feel about continuing with another compliance
2 review after one was granted before, it seems
3 like you could get all the way to the end of five
4 years and have compliance reviews.

5 K.S. ALIOTO: Well we did have a
6 little -- it did change somewhat with a former
7 member of associate assistant secretary not
8 approving what NACIQI and the department had
9 originally suggested, but still went forward and
10 said to do the -- make those steps necessary.

11 Now we're adding other steps that are
12 necessary but it seems to me that in practically
13 every agency that we're dealing with, it is a
14 situation of improvement, not perfection, and
15 that we're continuing to help agencies improve
16 without saying that they're going to go down the
17 chute and not be accredited -- sorry.

18 CHAIR KEISER: We have a new member.

19 K.S. ALIOTO: Even more vociferous
20 than I.

21 W. BOSTON: Hey, Art --

22 (Simultaneous speaking.)

1 W. BOSTON: I just have this -- I
2 mean, I guess my question's a little broader. I
3 understand that when they were put under the
4 compliance review before, I think we were under
5 the regulations prior to February of '19, or
6 whenever the new regulations were issued, and now
7 we're under the new regulations. But at least
8 with this particular agency we're on another, you
9 know, we're back-to-back compliance reviews.

10 We had one agency, my recollection is
11 it was the Maryland agency to approve nurses that
12 was in a similar situation, and this committee
13 was not happy with it. And as I recall we did a
14 12 month compliance review instead of an 18 month
15 compliance review, so that's why I bring this up.

16 CHAIR KEISER: I mean, it sounds like
17 we do not want to put this on the consent agenda
18 and want to head to review, is that what you're
19 looking at, Wally?

20 W. BOSTON: That would be my
21 preference.

22 CHAIR KEISER: Okay. If that is the

1 case then -- Herman, I'm not sure if that's your
2 hand, you got to use the electronic hand, but I
3 do have Zakiya and Bob first unless you really
4 need to explain what we're doing here.

5 H. BOUNDS: I do --

6 (Simultaneous speaking.)

7 CHAIR KEISER: It looks like we're
8 going to cover the consent agenda then go to our
9 normal process.

10 Go ahead, Herman, and then Zaki --
11 then Zakiya and then Bob -- I'll get it right,
12 Zakiya, I'm sorry.

13 (Simultaneous speaking.)

14 H. BOUNDS: Yeah, sorry, I couldn't
15 figure out how to use the hand-raise. This is
16 not a compliance report, this is to renew the
17 Agency's recognition for 18 months. And the
18 reason we're renewing for 18 months is because we
19 have to subtract all that compliance report time
20 from their recognition period. So our
21 recommendation is to renew the Agency's
22 recognition for 18 months because they have

1 addressed all of the issues that were remaining
2 in the compliance report. So again, it is not an
3 additional compliance report.

4 W. BOSTON: Thank you. So I guess the
5 confusion is in the -- it says, submission for a
6 compliance report.

7 CHAIR KEISER: Yeah, that's what I
8 read too.

9 W. BOSTON: Yeah.

10 H. BOUNDS: Yeah, that submitted a
11 compliance report to address the issues that were
12 brought up at the previous NACIQI meeting. So
13 since they had those previous issues we then
14 recommended a compliance report to address the
15 remaining issues, and now we have to subtract all
16 that compliance report time from the recognition
17 period.

18 For state agencies that recognition
19 period is four years so there is now about 18
20 months left on their period for recognition, so
21 that is the reason for the 18 months.

22 CHAIR KEISER: Zakiya and then Bob?

1 Z. SMITH ELLIS: Yes, I actually have
2 a question for the Agency so I'm not sure
3 procedurally how best to do that, and I'll just
4 say what it is. If you want to introduce the
5 folks, that's fine.

6 I reviewed the materials and realized
7 that I'm coming after you all already voted in
8 the compliance report, etcetera, but it's just a
9 question about their data tracking for outcomes
10 from graduates in the workforce.

11 So if you want me to ask the question
12 I can, or you can introduce the --

13 CHAIR KEISER: I'm going to introduce
14 the staff and then the other staff, we'll go
15 through the regular process. And Bob -- and then
16 you can ask the question, Zakiya. Bob?

17 B. SHIREMAN: Thanks. Yeah, I think
18 probably I can handle mine in the regular course,
19 it's about the timing and why it took so long,
20 and I -- that was touched on by Steve but we can
21 handle that at whatever point makes sense.

22 CHAIR KEISER: Okay, great. Well if

1 I may now introduce the department staff, Mr.
2 Paul Florek. And if you would, give us a report,
3 Paul?

4 P. FLOREK: Good morning. Can you
5 hear me?

6 CHAIR KEISER: Yes.

7 P. FLOREK: Great. Good morning, Mr.
8 Chair, members of the committee, my name is Paul
9 Florek. I am providing a summary of the review
10 of the compliance report for the New York State
11 Board of Regents, State Education Department,
12 Office of the Professions, Public Post-Secondary
13 Vocational Education, Practical Nursing hereafter
14 referred to as the Agency.

15 The Agency is a state agency
16 recognized for their approval of public post-
17 secondary vocational education and is currently
18 recognized by the department. The staff
19 recommendation to the Senior Department Official
20 is to accept the compliance report and renew the
21 Agency's recognition for 18 months. This
22 shortened period is necessary in order for the

1 Agency to remain in an appropriate approval
2 timeline based on regulation in 602.23.

3 This recommendation is based on the
4 review of the Agency's narrative and supporting
5 documentation in response to the three concerns
6 raised by the SDO letter dated May 27, 2020. The
7 department did not receive any complaints or
8 third party comments during the compliance
9 response period, there are representatives from
10 the Agency that are here today to respond to your
11 questions. Thank you.

12 CHAIR KEISER: Any questions for the
13 staff? If not, at this -- Bob, you have a
14 question for the staff?

15 B. SHIREMAN: Yeah, I think this is
16 probably an appropriate time to address this. So
17 the vote by NACIQI was February 2020, which was
18 before I started, then the letter was May 2020,
19 it called for a compliance review in one year
20 which would be May 2021, which would have been
21 right before the -- last July, a year ago, NACIQI
22 meeting -- so I can understand why maybe this

1 would not have come up then, it would've been
2 very quick, but it's another year beyond that
3 now, rather than last February.

4 So can you say more about why the
5 timing was so delayed? And I want to understand
6 this in part because of this Agency but also,
7 when we're looking at other agencies and we're
8 asking for monitoring or compliance in 12 months,
9 I want to get a better understanding if what
10 we're really talking about is 18 or two years.
11 In which case, in some cases it might make sense
12 to do monitoring or compliance in a shorter time
13 period, especially if it's a simple issue.

14 But can you say more about what
15 happened in this particular case?

16 P. FLOREK: I think I might let Herman
17 answer that question but -- and he has his hand
18 raised, so I'll definitely let Herman answer that
19 question.

20 H. BOUNDS: Okay, let me find my mute
21 --

22 CHAIR KEISER: Herman?

1 H. BOUNDS: Yeah, I'm here, I just
2 wanted to make sure I was off mute.

3 CHAIR KEISER: You're fine.

4 H. BOUNDS: I was just trying to flip
5 over to the regulatory language. Basically, Bob,
6 the problem is that, in accordance with the new
7 regulations we have to allow an agency 180 days
8 to respond to a draft analysis, so therefore we
9 have to anticipate that time. Now it could be
10 that the agency addresses all of the issues and
11 there are no deficiencies in the draft, but we
12 can't anticipate that so we always have to figure
13 in that additional six months any time we review
14 an accrediting agency.

15 So that accounts for some of that, you
16 know, for some of that additional time. So
17 that's what --

18 B. SHIREMAN: That 180 days applies --
19 sorry. That 180 days applies whether it's a
20 compliance report or a --

21 H. BOUNDS: That's correct.

22 B. SHIREMAN: So any analysis?

1 H. BOUNDS: That's correct. And so we
2 have to kind of anticipate for that, and then
3 because of that we also then compare that to when
4 the agency's recognition would expire. And we
5 try to back that up to the NACIQI meeting before
6 that time because then we also have to allow for
7 the 90 days for the SDO decision, whether the SDO
8 takes 90 days or not.

9 CHAIR KEISER: That answer your
10 question, Bob?

11 B. SHIREMAN: Yes, thank you very
12 much.

13 CHAIR KEISER: Okay. If I may
14 introduce our two agency representatives, I hope
15 I get this correct, Jeanne-Marie Havener and
16 Casey Schenk who are representatives of this
17 agency. It's your turn to say what you like.

18 J.M. HAVENER: So this is Jeanne-Marie
19 Havener, and on behalf of the New York State
20 Department of Education, the Office of
21 Professions, and Professional Education Program
22 Review, we would like to thank all of you for

1 your time and your effort that you have put into
2 analyzing our documents and providing us with
3 feedback.

4 CHAIR KEISER: Thank you. Are there
5 questions for the Agency from any members of the
6 committee? Zakiya?

7 Z. SMITH ELLIS: Yes, thank you, and
8 thank you all for the documents. I was just
9 reviewing and saw that you do, as part of your
10 review, look at the test scores and employment
11 rates of your, of the graduates of the program,
12 which I think is fantastic. But I'm wondering if
13 you have a statewide data system that can
14 actually track whether they're working in the
15 state, and if that's something that you use or
16 anticipate using in the future?

17 J.M. HAVENER: So currently we track
18 information on annual examination pass rates and
19 employability through the annual reports that are
20 submitted to us. Some data is shared with
21 professional licensing, which is another
22 division, as well they share some information

1 with a workforce development group that is
2 through the State University of New York.

3 Z. SMITH ELLIS: Thank you.

4 J.M. HAVENER: Mm-hmm.

5 CHAIR KEISER: Wally?

6 W. BOSTON: Thank you, Art. Just one
7 question. As you know we have a dashboard pilot
8 and the dashboards are issues each year, and they
9 were recently updated. And I guess I want to
10 commend you on your loan performance dashboard,
11 the loan performance rates of your 19
12 institutions look pretty good.

13 I do have a question, though, there
14 appear to be two outliers with lower graduation
15 rates and it's my understanding that nursing
16 programs, particularly with certificates, are
17 monitored pretty tightly on the percentage of
18 students that graduate. So, you know, what's
19 your typical process when someone falls into
20 these -- like, it appears that both of them are
21 below 50 percent, are they given -- is this
22 because this is the first-time graduation rate

1 and there's a higher graduation rate if the
2 monitoring was extended beyond that, or can you
3 comment? Thanks.

4 J.M. HAVENER: You're welcome. So in
5 terms of tracking such performance, once you've
6 finished with a visit to a site, we provide them
7 with some feedback and we ask them to respond to
8 us and tell us what it is that they plan to do in
9 order to address concerns such as those that you
10 mentioned.

11 Once all of this data is reviewed and
12 analyzed within the department, then decisions
13 are made as to whether or not we seek to follow
14 them and their compliance through reporting, or
15 we follow up with another report. And I believe
16 both of those institutions are, maybe for lack of
17 a better term, are under somewhat closer
18 scrutiny. We are putting them (Audio
19 interference.) in order to try and help them to a
20 certain -- what are the factors that are going on
21 that are influencing that outcome.

22 W. BOSTON: Thank you.

1 J.M. HAVENER: Did that answer your
2 question?

3 W. BOSTON: Mostly. I guess --
4 probably, this may be a question for the person
5 who puts our dashboard together but my
6 understanding these, it says that most of your
7 schools, your 19 schools, are certificate
8 programs. And a lot of our tracking for
9 graduation rates for degrees, it goes beyond, you
10 know, 150 percent, 200 percent in different
11 cases, for associates and bachelor's.

12 And I'm not -- my recollection isn't
13 exactly how far we extend it for practical
14 programs, certificates, but I would assume it's
15 pretty important if the school ultimately wants
16 to get their graduates licensed, which these are
17 all practical nursing programs, that they would
18 eventually try to see their graduates through in
19 order to get them to take the licensure exam and
20 be able to pay their loans back.

21 I mean, what's interesting is, the
22 level of performance looks really good, your

1 lower line, what, is at 82 percent, and so
2 implies that they're -- to me -- that they're
3 eventually graduating and they're eventually
4 passing the licensing exam.

5 J.M. HAVENER: Yes. And the
6 certification programs, they are short length
7 programs, so typically if a student were to
8 withdraw from such a program they would in
9 essence come back and repeat the entire program,
10 is the way that that works. But every program
11 deals with that differently, some will allow the
12 students to test-out on areas in which they have
13 already completed successfully, and try to
14 readmit them at some point.

15 And there are some others who have to
16 make them repeat just because of the fast pace of
17 the program.

18 CHAIR KEISER: Mary Ellen?

19 S. VAN AUSDLE: This is Steve. I can
20 use this head -- I haven't found the other half.
21 I do have a comment.

22 CHAIR KEISER: Yeah, but Mary Ellen

1 has her hand up first, and then I come to you,
2 Steve. It's been the reactions, if you go down
3 at the bottom, you'll see reactions. And those
4 are where you'll be able to raise your hand.

5 S. VAN AUSSLE: Got it.

6 CHAIR KEISER: Okay? Mary Ellen,
7 you're up. And then Steve, and then Jennifer.

8 M.E. PETRISKO: So, if I read this
9 correctly, and the Chair noted that there were no
10 average benchmarks for complaints, default rates,
11 graduation rates, but there was an expectation
12 that an 80 percent first-time rate would be
13 maintained.

14 And it said further that the Staff was
15 suggesting to the agency that guidance be
16 provided regarding default rates, graduation
17 rates and placement rates.

18 So, I was wondering, with that
19 suggestion that guidance be put into place, what
20 is happening with regard -- like do you have more
21 explicit statements about what the expectations
22 are there? And if not, are you considering that?

1 I understand it's difficult to have a
2 specific cutoff line, but I would just like to
3 have greater clarity on what the case is now, and
4 whether there is any movement toward clarity and
5 what the expectations are, our requirements are,
6 actually. Thank you.

7 J.M. HAVENER: Thank you. So, that is
8 under the purview of the Board of Nursing and the
9 Board Secretary to establish such benchmarks.
10 And she has been, along with the Board, they have
11 been exploring such things.

12 That process has not yet completed.
13 Within the Department, all program services are
14 required to submit a systematic evaluation plan.

15 And as a part of that evaluation plan,
16 we asked them to establish benchmarks, with the
17 understanding that there are some nursing
18 programmatic accrediting agencies that have
19 established benchmarks. And we counseled them
20 when they set the bar low to think about this.

21 And certainly, we do have some tools
22 -- excuse me, that are dealing, perhaps with a

1 more challenging demographic. And so, they will
2 sometimes say it's more difficult to achieve that
3 benchmark with this particular demographic.

4 In truth of the default rates,
5 typically what we do is we look at what is the
6 average default rate for a life program, and we
7 look at each program with regard to the national
8 average default rate for that type of program.
9 And if they fall below that, then it is an area
10 for conversation and improvement.

11 CHAIR KEISER: Thank you. Steve, you
12 had a questions?

13 S. VAN AUSDLE: I put my hand down,
14 because the question was primarily answered in
15 your last comment you made. But I would make the
16 statement that I think you were -- when we
17 accredit a state agency, a little different
18 criteria.

19 And looking at the three-criterion
20 question, you came back and answered all our
21 questions on that. I appreciate it. This last
22 one I think is important that one thing the state

1 agency is required to do is to coach your schools
2 to get better.

3 And I think we've hit on improving the
4 outcomes, and majoring the outcomes is the one
5 area that was suggested. And I hear you're
6 embracing that. So, compliment you for that.

7 CHAIR KEISER: Jennifer?

8 J. BLUM: I think I'm going to lower
9 my hand. I mean, there's a follow-up to Wally on
10 the dashboard. Well, let me just say this.

11 I think I'm correct in that your
12 accrediting program with the dashboard is at the
13 institution level.

14 So, when we're looking at the debt, I
15 assume that there are -- and maybe this is
16 wrong -- but some of what you're accrediting is
17 just a component part of an overall institution.
18 So, is that accurate?

19 J.M. HAVENER: It depends on the
20 institution. So, most of these programs are
21 from, in terms of, let's just say Title IV, the
22 nursing program is oftentimes the only program

1 within the institution that has things in the
2 Title IV program. Occasionally, that focus.

3 J. BLUM: Okay, that's what I was
4 trying to understand, is whether the dashboard is
5 actually including other students other than just
6 the program that you're accrediting. That's what
7 I was getting at. Okay, thank you.

8 J.M. HAVENER: You're welcome.

9 CHAIR KEISER: Seeing no further
10 questions, I don't see any third-party comments.
11 George, are there any out there from today?

12 G.A. SMITH: No extra ones, thanks.
13 None at all.

14 CHAIR KEISER: Okay. Paul, do you
15 have comments that respond to the Agency's
16 comments?

17 P. FLOREK: Nothing further to add.

18 CHAIR KEISER: Then I'd ask the two
19 primary readers if they'd be interested in making
20 a motion.

21 S. VAN AUSDLE: I move that we renew
22 the Agency's recognition for eighteen months.

1 CHAIR KEISER: There's a motion. Is
2 there a second? Is there a second?

3 J. DERBY: I'll second it.

4 CHAIR KEISER: Okay. Thank you, Jill.
5 I needed that. Okay, as you'll see, we have a
6 roll call. And is that Monica doing the roll
7 call?

8 M. FREEMAN: Yes.

9 CHAIR KEISER: Okay, Monica. You're
10 up.

11 M. FREEMAN: Kathleen?

12 K.S. ALIOTO: Yes.

13 M. FREEMAN: Roslyn?

14 R. ARTIS: Yes.

15 M. FREEMAN: Jennifer?

16 J. BLUM: Yes.

17 M. FREEMAN: Ronnie?

18 CHAIR KEISER: He's not here.

19 M. FREEMAN: Wally?

20 W. BOSTON: Yes.

21 M. FREEMAN: Jill?

22 J. DERBY: Yes.

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M. FREEMAN: David?

D. EUBANKS: Yes.

M. FREEMAN: And Michael Lindsay?

M. LINDSAY: Yes.

M. FREEMAN: Robert?

R. MAYES: Yes.

M. FREEMAN: Molly?

M. HALL-MARTIN: Yes.

M. FREEMAN: Mary Ellen?

M.E. PETRISKO: Yes.

M. FREEMAN: Claude?

VICE CHAIR PRESSNELL: Yes.

M. FREEMAN: Bob?

B. SHIREMAN: Yes.

M. FREEMAN: Zakiya?

Z. SMITH ELLIS: Yes.

M. FREEMAN: And Steven.

S. VAN AUSDLE: Yes.

CHAIR KEISER: Thank you everyone. It
appears that the motion carries. And thank you
very much, members of the New York State Board.
Thank you very much for being with us.

1 J.M. HAVENER: Thank you, Chairman.
2 I do appreciate it.

3 CHAIR KEISER: Even though we just
4 went through the standard review process, I will
5 go through the steps again, just so you
6 understand in the standard review process
7 procedures, the primary readers introduce the
8 Agency's application.

9 The Department Staff provides a
10 briefing. The Agency representatives then
11 provide comments to the Committee. Then,
12 questions by the Committee are followed by a
13 response and comments from the Agency. And if we
14 have third-party comments, they will be able to
15 make their thoughts known.

16 The Agency will then have an
17 opportunity to respond to third-party comments.
18 Then the Department Staff responds to the Agency
19 and third-party comments, and then we have a
20 discussion and vote.

21 VICE CHAIR PRESSNELL: Mr. Chairman?

22 CHAIR KEISER: Yes.

1 VICE CHAIR PRESSNELL: If we could
2 take a minute -- since this is the first review
3 under the new regulations, I was wondering if we
4 could get some comments from Herman on how he is
5 seeing this transition take place, just to help
6 us get a feel on context.

7 Because it seems as if there are a lot
8 of findings across the Board, and I was just
9 wondering if we could talk about, one, how is the
10 process done, and whether or not, in general, he
11 sees the accrediting agencies -- how is he seeing
12 that transition from the old regulations to the
13 new regulations? Just to give us some context.

14 And I'm not asking for a lot of time.
15 But, Herman, could you just help us understand
16 how the process went this year? Would that be
17 acceptable before we begin reviews?

18 CHAIR KEISER: It's certainly
19 acceptable and appreciated, Claude. Herman, if
20 you would?

21 H. BOUNDS: Sure. I think two things
22 to remember. One thing is that we dropped the

1 focus review in combination with the new
2 regulations. So, basically, accrediting agencies
3 have not been used to responding to all the
4 regulatory criteria, so that has caused some
5 additional issues.

6 And then, I think there could be some
7 attention to detail issues with really reading
8 and understanding and interpreting what the new
9 regulations requiring.

10 And in some cases, we're seeing just
11 a slowness in adopting standards and policies for
12 the new regulations. I mean, we expected that
13 there would be some lag, especially when you look
14 at the processes that accrediting agencies have
15 to go through to change their policy manuals and
16 all those types of things.

17 So, we kind of expected a lag, I
18 guess. But you can see that the responses vary.
19 Some accrediting agencies were able to dive right
20 in and make the adjustments that they needed, and
21 some were slower.

22 And you'll notice in the draft too,

1 Claude, I think you may have alluded to this.
2 You know the draft analyses were all pretty heavy
3 on deficiencies.

4 We tried to kind of help guide them
5 along with adopting of new standards and policies
6 to address new regulations.

7 So, I guess overall to say yeah, it
8 hasn't been a smooth transition, but it hasn't
9 been as bad as it could have been.

10 So, I think most of the agencies who
11 were responsive when we tried to explain what
12 they needed to do, I think some may have not
13 anticipated the time, with the new two-year
14 requirements.

15 Some agencies may have said, oh, we
16 have a lot of time to get this done. But really,
17 they did not. So, hopefully it will get better.

18 And I hope that kind of answered your
19 question. It's just been a rocky road for I
20 think some agencies to kind of adopt some of
21 these new requirements.

22 And again, I think the other thing

1 that also contributed that was suspending the
2 focused review, which in itself was different
3 because the focus review was only a 25 or 26
4 regulatory criterion, which they had been used to
5 responding to for many years.

6 VICE CHAIR PRESSNELL: Yeah, I
7 appreciate that. Because I think the big task
8 that we have as a Committee, is trying to
9 determine which ones are critical and which one
10 are procedural, lagging-type things, when we
11 review the agencies.

12 And I think that probably you're going
13 to hear some questions about that. And all those
14 who are listening in today, we're really needing
15 to understand what are true deficiencies and what
16 are just kind of some lagging compliance issues
17 related to trying to adopt the new standards.

18 And not only that, there are also for
19 the agencies to clearly understand what they
20 mean, making sure that they've got sufficient
21 guidance on what each of those changes mean.

22 Herman, was there any process issues

1 related to uploading documents or downloading?
2 Any problems with that this year, or with this
3 review?

4 H. BOUNDS: I have two eRecognition
5 experts are on the call. I don't think we really
6 had a lot of technical difficulties with
7 eRecognition. I think the main issue was just
8 the large quantity of documentation required by
9 the new regulation.

10 If you look at the length or the size
11 of the petition for re-recognition feedback in
12 February, where a final Staff analysis, Agency
13 narrative, and Staff narrative, may have been
14 50 pages.

15 Well, now, you see just the narrative
16 portions anywhere from 200 to 400 pages. I mean,
17 that is just a boom in information and
18 documentation, in addition to the increase in the
19 narrative side. So, I think that was probably a
20 lot of it.

21 The other thing too to remember, is
22 that we have this new recommendation that we can

1 make, substantial compliance. And I know I'm
2 probably going to get some questions on that
3 later today too.

4 The issue with that particular
5 recommendation, is when you look at it, we have
6 to first have an agency policy. So, that's the
7 problem. If we don't have a clear policy, we
8 just can't use that, because we have to determine
9 if the policy is compliant or not.

10 Now, just because we have agencies
11 that may have a lot of non-compliant areas
12 because they didn't provide a policy now -- I
13 think somebody asked me a question about that in
14 the email this week -- we don't know if it has
15 all the things that the new regulation requires,
16 because we just haven't seen it.

17 It doesn't mean that the agency is
18 gross negligent or anything. It's just that we
19 don't have that particular policy, or we're
20 missing a piece of documentation that we need to
21 see to demonstrate application.

22 Doesn't mean that any of these guys

1 are just negligent in what they're doing. It's
2 just for some reason they just didn't provide
3 that piece of documentation that we needed.

4 And again, I think some of that is
5 caused by the new regulations, and maybe not
6 interpreting what those new regulations mean.

7 But we have reached out. We have tons
8 of email traffic conversations between my staff
9 and agencies, trying to help them do those
10 things. But at some point I have staff members
11 that are reviewing three agencies at the same
12 time.

13 So, we don't know unless an agency
14 tells us they're having trouble. And I think in
15 a lot of cases, last-minute, or once the finals
16 were due back in to us to review, that's when we
17 were sometimes alerted of, hey, I don't quite
18 understand what I need here.

19 But at that time, at some point we
20 have to just move on and list what the agency is
21 non-compliant with.

22 But again, I do want to stress it

1 doesn't mean that they're gross negligent in this
2 case. It just means that they didn't understand,
3 or they didn't give us the documentation that we
4 needed.

5 CHAIR KEISER: Thank you, Herman.

6 Bob, you had a question to Herman?

7 B. SHIREMAN: Yeah, or really more on
8 the process issues. I just wanted to bring up
9 that at our last couple of meetings we talked
10 about being totally appropriate and fine for
11 people when they vote, in addition to a yea or a
12 nay, to make some kind of a comment.

13 And I wanted to bring that up just
14 because the voting form that we saw a moment ago
15 for the last agency didn't have any accommodation
16 for that. And I would appreciate it in any case
17 if it was on there, so that it would not seem an
18 oddity or something, if somebody wants to do
19 that.

20 CHAIR KEISER: Thank you. Okay, we'll
21 move to the renew of recognition for the Distance
22 Education Accrediting Commission. George, I'm

1 not aware, do we have anyone recusing from this
2 particular agency? Because I don't have a list.

3 G.A. SMITH: Yes, I think there is a
4 recusal.

5 J. BLUM: Two.

6 G.A. SMITH: First, I'd like the
7 person to just mention their recusal.

8 J. BLUM: There are two, I think. I'm
9 recusing myself, so I'll be signing off.

10 CHAIR KEISER: For those who don't
11 know where there is potentially a conflict of
12 some sort, the people will turn their cameras off
13 and turn their microphones off and not
14 participate in the discussion during the
15 discussion, or even after the discussion, after
16 the vote. So, that's the new policy.

17 (Simultaneous speaking.)

18 G.A. SMITH: The second person -- can
19 the second person identify themselves?

20 CHAIR KEISER: Jennifer Blum and
21 Robert Mayes.

22 R. MAYES: Yes.

1 G.A. SMITH: Okay, very good. We
2 will --

3 (Simultaneous speaking.)

4 J. BLUM: Art, can I ask a clarifying?
5 So, I'm allowed to stay in as long as I'm video
6 and muted? I thought I had to log out and go in
7 as a public member.

8 CHAIR KEISER: I thought so too. But
9 then again, I did read it was a little different
10 in the directive that was sent out, I believe it
11 was yesterday or the day before. General
12 counsel, do you have a clarification on that?

13 G.A. SMITH: OGC is fine with them
14 staying on camera, muting and not participating
15 in the discussion. So, that's fine.

16 J. BLUM: I'll go off-camera and mute.

17 CHAIR KEISER: It is off-camera and
18 off-microphone.

19 G.A. SMITH: Uh-huh. No
20 participation. Thank you.

21 CHAIR KEISER: Great. And so, I went
22 over the process. The two primary readers for

1 NACIQI are Roslyn Clark-Artis and David Eubanks,
2 and the floor is yours.

3 R. ARTIS: Good morning, colleagues.
4 We're addressing the Distance Education
5 Accrediting Commission -- it's DEAC -- accredits
6 postsecondary institutions in the U.S. that offer
7 degree and/or non-degree programs primarily by
8 distance or correspondence education, up to and
9 including professional, and also degree.

10 The organization has been recognized
11 by the U.S. Government since 1959 consistently as
12 an accreditor of postsecondary institutions.

13 With expansions to that authority in
14 2006 and 2014, they were here to review the
15 renewal of recognition request.

16 Unless my colleagues would like to add
17 anything to the introduction, the Staff member
18 who will provide the briefing is Paul Florek.

19 P. FLOREK: Good morning again,
20 Mr. Chair and members of the Committee. My name
21 is Paul Florek.

22 I am providing a summary of the review

1 of the petition for renewal of recognition and
2 request for expansion and scope for the Distance
3 Education Accrediting Commission, hereafter
4 referred to as D-E-A-C, or the Agency.

5 Agency is a Title IV institutional
6 accreditor currently recognized by the
7 Department. The Staff recommendation to the
8 senior Department official for this Agency is to
9 renew the Agency's recognition for a period of
10 five years.

11 This recommendation is based on the
12 review of Agency's petition and its supporting
13 documentation, as well as two virtual file
14 reviews in December 2020 and May 2022, a virtual
15 site visit in October 2020, a virtual field panel
16 training session in December 2020, and a virtual
17 meeting of Agency's decision-making body in
18 January of 2021.

19 Department Staff also recommends
20 approval of Agency's requested scope of
21 recognition, resultant from the change in
22 regulation effective July 2020, which adds direct

1 assessment to the Agency's current scope of
2 recognition as discussed in the petition.

3 The amended scope would read, the
4 accreditation of postsecondary institutions that
5 offer degree and/or non-degree programs primarily
6 by the distance or correspondence education
7 method, including through direct assessment, up
8 to and including the professional doctoral
9 degree, including those institutions that are
10 specifically certified by the Agency as
11 accredited for Title IV purposes, with the
12 geographic area of accrediting activities being
13 the United States.

14 The Department did not receive any
15 complaints during the recognition period. Third-
16 party comments were addressed in the petition by
17 Department Staff.

18 There are representatives from the
19 Agency that are here today to respond to your
20 questions. Thank you.

21 VICE CHAIR PRESSNELL: Art, you're
22 muted. Hey, Art, you need to repeat that.

1 You're muted.

2 CHAIR KEISER: I'm trying to make sure
3 there's no background noise. I'd like to
4 introduce Dr. Leah Matthews, who's the executive
5 director of the DEAC, and have her introduce her
6 team, and then provide comments.

7 L. MATTHEWS: Good morning. I'm
8 Dr. Leah Matthews, Executive Director of the
9 Distance Education Accrediting Commission.
10 Joining me today are Dr. Cheryl Hayek, the chair
11 of the Commission, Dr. Wanda Nitsch, the vice-
12 chair of the Commission and chair of the Academic
13 Review Committee, and Julie Miceli, outside
14 counsel from the law firm of Husch Blackwell. We
15 would like for you to hear first from Dr. Hayek.

16 C. HAYEK: Good morning. My name is
17 Dr. Cheryl Hayek. And, as Dr. Matthews said, I
18 am the chair of the Accrediting Commission.

19 I also serve as the chief academic
20 officer, the Art of Education University, a DEAC-
21 accredited institution, a position that I came to
22 after more than twenty years of research and

1 experience rooted in the online success of adult
2 learners.

3 I have firsthand knowledge of how DEAC
4 and distance education supports those who are
5 seeking to broaden their existing knowledge, or
6 changing careers, and how working professionals
7 can work towards new or adjacent careers, because
8 of the opportunities presented by distance
9 education.

10 I have the honor of serving with eight
11 other highly qualified volunteer commissioners,
12 many of whom have had extensive careers in
13 distance education.

14 DEAC commissioners have served as
15 faculty members and administrators in accredited
16 distance education institutions, and site
17 visitors for DEAC and other nationally and
18 historically regional accrediting organizations.

19 Others have contributed expertise in
20 law, finance, higher education policy, and state
21 regulation.

22 Five of our commissioners hold

1 doctoral degrees, three are certified public
2 accountants, and three commissioners are
3 attorneys who have many years of experience
4 advising higher education institutions and
5 accrediting organizations.

6 One commissioner is a lecturer at the
7 USC School of Law. One is a former general
8 counsel at the University of North Carolina
9 systems.

10 Five of our ten current commissioners
11 represent the public, and therefore have no
12 affiliation with DEAC-accredited or applicant
13 institutions.

14 The DEAC Commission prioritizes the
15 integrity of its work in a number of ways. DEAC
16 insists that commissioners receive a federal
17 orientation and ongoing training in the
18 application of standards and procedures, due
19 process consideration, and our role as leaders
20 and fiduciaries of DEAC.

21 Prior to each meeting, Commissioners
22 review and sign DEAC's conflict-of-interest and

1 confidentiality policies, and agree to abide by
2 them.

3 Prior to concluding each meeting of
4 the Commission, the Commission takes the extra
5 step of reviewing all accreditation actions for
6 consistency and for fidelity to the standards.

7 The Commission's policy discussions
8 are informed by regular briefings about changes
9 occurring in higher education, and specifically
10 in distance education.

11 These briefings include advances in
12 technology, and other innovations in teaching and
13 learning, specific to distance education
14 pedagogies that enhance student engagement and
15 success.

16 The Commission takes seriously the
17 input of its accredited institutions and other
18 stakeholders who are invited to comment on all
19 proposed standards and policy revisions, before
20 finalizing any changes or new initiatives.

21 The Commission frequently collaborates
22 with other organizations in order to improve its

1 work, and is most interested in partnerships that
2 can lead to improved quality, access and
3 accountability of higher education, and those
4 that contribute to the public good.

5 A few examples include DEAC's
6 participation in the Collaborative for Quality
7 and Alternative Learning, a partnership with
8 Quality Commons to advance potential
9 employability qualifications, certification for
10 students who are entering the workforce for the
11 first time, a collaboration with the credential
12 engine to bulk-upload DEAC institutional
13 information on programs and learning outcomes
14 into its massive database of linked outcomes data
15 that are available to the public, a partnership
16 with Higher Digital to provide any distance
17 education programs -- not just those holding
18 DEAC-accreditation -- with a free benchmarking
19 tool that evaluates education quality against 40
20 data points spanning academics, operations,
21 organizational effectiveness, and technical
22 dimensions.

1 A webinar collaboration with the
2 counsel for accreditation of counseling and
3 related educational programs, to raise awareness
4 of mental health challenges in the wake of the
5 global pandemic, and support for the National
6 Council of State Authorization Reciprocity
7 Agreements in the development of the 21st Century
8 distance education guidelines.

9 DEAC is also an active participant in
10 the International Network for Quality Assurance
11 Agencies in Higher Education, INQAAHE,
12 contributing to its knowledge and experience in
13 distance education to a global network of quality
14 assurance organizations.

15 This petition for re-recognition by
16 the Department of Education has been taken
17 seriously by DEAC at all levels of the
18 organization.

19 It is the culmination of a focused,
20 multi-year process that included revisions to
21 DEAC standards and policies necessary to
22 implement changes to the recognition criteria,

1 that became effective on July 1, 2020.

2 We appreciate the hard work that our
3 executive director, Dr. Matthews, her staff and
4 our commission in this process. We are pleased
5 that the Department of Education Staff has
6 determined that DEAC is in full compliance with
7 each of the recognition criteria and its
8 recommendation for a five-year renewal of
9 recognition, to include direct assessment within
10 the scope of recognition.

11 We would like to thank the Department
12 Staff, including Mr. Brown, Dr. McKissic, and
13 Mr. Florek, for their professionalism and
14 technical assistance during the review process.
15 I would now like to turn to Dr. Nitsch for her
16 opening remarks. Thank you.

17 W. NITSCH: Good morning. My name is
18 Dr. Wanda Nitsch. And as Dr. Matthews indicated,
19 I am the vice-chair of the Distance Education
20 Accrediting Commission, and a public member.

21 I have been involved in higher
22 education for 25 years, as recently as President

1 and Chief Academic Officer of the University of
2 St. Augustine for Health Sciences.

3 I retired from the university in 2018,
4 before becoming a DEAC commissioner. I'm also a
5 physical therapist with experience collaborating
6 with other health profession education programs,
7 and their accreditation requirements.

8 Throughout my career, I have been a
9 strong supporter of student-centric support
10 services, innovative educational technology, and
11 collaborative approaches to teaching and
12 learning.

13 My research has focused on outcome
14 assessment, distance education administration,
15 equity development, and institutional research.

16 I would like to focus my remarks today
17 on a few unique features of DEAC accreditation.

18 First, DEAC is the only Department of
19 Education-recognized accrediting agency where
20 accredited institutions are dedicated to serving
21 adult learners who may be unable to regularly
22 attend a physical campus.

1 Often, these adult learners consider
2 themselves to be more independent students who
3 thrive in an environment that provides a balance
4 between flexibility and structure.

5 DEAC standards are specifically
6 aligned with these adult learners who are unable
7 to regularly attend a physical campus. Often,
8 these adult learners consider themselves to be
9 more independent students who thrive in an
10 environment that provides balance between
11 flexibility and structure.

12 When accredited distance education
13 institutions are successful, students can
14 benefit, regardless of geographic location, and
15 can organize their studies to fit within personal
16 life commitments.

17 Taken together, DEAC standards
18 represent the comprehensive and detailed
19 collection of requirements focusing on an
20 institution's mission of providing quality
21 distance educational offerings that meet the
22 needs of students.

1 Second, DEAC standards also assess
2 quality at the program level. Subject matter
3 specialists and education standard evaluators
4 review individual programs to determine whether
5 learning outcomes reflect academic competence at
6 the appropriate level and rigor, and to
7 communicate the knowledge and skill students will
8 acquire upon successful completion of the
9 program.

10 The standards promote program design
11 results in cohesive educational offerings, and in
12 evaluation methods of student learning that are
13 clearly connected to the stated outcomes.

14 As a public commissioner and chair of
15 DEAC's Academic Review Committee, I have
16 participated in reviewing new programs, and
17 programs within institutions seeking renewal of
18 accreditation.

19 DEAC places great emphasis on each
20 institution's assessment methodology and
21 practices, both at the institutional and the
22 program levels, requiring systematic and ongoing

1 process for analyzing data and documenting the
2 results to meet both internal and external
3 benchmarks, including those comparable to
4 programs offered at peer DEAC-accredited
5 institutions.

6 Review procedures may involve
7 examining institutional data related to select
8 individualized student experiences as the
9 students progress through a program of study, and
10 how an institution is using that data to improve
11 the learning experience.

12 Institutions provide validation of the
13 outcome data, where such data may include an
14 analysis of student examinations, theses or
15 dissertations, or alignment with desired program
16 outcomes.

17 Evaluating how institutions identify
18 and apply key metrics for institutional
19 effectiveness study and improvement, in another
20 assessment strategy that DEAC employs as it seeks
21 evidence that an institution has sound internal
22 policies and procedures for gathering detailed

1 information on institution performance.

2 Institutions must demonstrate clear
3 and systematic assessment of outcome data, and
4 show that external stakeholders provide feedback
5 on whether the institution's improvement strategy
6 is useful and attainable, to build upon its
7 existing strength in utilizing quantifiable data
8 analysis.

9 And, consistent with this commitment
10 to continuous improvement, DEAC is implementing a
11 more focused institutional research function to
12 provide leadership and oversight of functions
13 related to the collection, interpretation, and
14 use, of institutional data.

15 DEAC is committed to continuing to
16 support our accredited institutions with ongoing
17 training and professional development in the use
18 of data and assessments to support continuous
19 improvement and effectiveness in distance
20 learning environments.

21 DEAC requires their institutions to
22 use assessment results to actually make

1 pedagogical and curricular changing to enhance
2 student learning.

3 Assessment is top of line in the
4 planning of DEAC conferences and workshops, where
5 notice experts deliver presentations on topics
6 that cover how to optimize teaching and learning
7 through outcome assessment practice, student
8 assessment to core competency, meta analysis, to
9 improve quality of academic program assessment,
10 pathways for assessing general education, and so
11 much more.

12 Thank you for your time and attention.

13 I will now turn this presentation over to
14 Dr. Matthews, Executive Director of DEAC.

15 L. MATTHEWS: Thank you, Dr. Hayek and
16 Dr. Nitsch, for your opening statements. It's an
17 honor to represent DEAC today, and I look forward
18 to addressing any questions NACIQI members may
19 have.

20 As a point of background, I came to
21 DEAC as executive director right after it
22 received renewal of recognition from the

1 Department in 2013.

2 I also presented DEAC's petition to
3 NACIQI in 2017, at which time DEAC was granted
4 five years of renewal of recognition.

5 I've been in the field of
6 accreditation for over 25 years. Most recently,
7 prior to joining DEAC, I served as the vice-
8 president for recognition services at the Council
9 for Higher Education Accreditation, CHEA.

10 As Dr. Nitsch indicated in her
11 remarks, DEAC is unique. It is the only
12 accrediting agency recognized by the Department
13 and CHEA, that is dedicated solely to serving
14 distance learners. This has been its mission for
15 nearly 100 years.

16 The schools, however, have one thing
17 in common, and that is they provide access to
18 distance learning for students everywhere.

19 I'm particularly happy to be able to
20 talk today about who DEAC is, and what we do.
21 Earlier, you heard Dr. Hayek speak to the
22 benefits of distance education for students who

1 are working adults.

2 That resonates deeply for me, because
3 I was one of those students. While serving as a
4 civilian based at the United States Army Japan
5 headquarters, I earned my master's degree from
6 the University of Oklahoma via distance
7 education.

8 That experience gave me firsthand
9 insight into the support structures needed for a
10 learner studying at a distance.

11 DEAC standards and processes were
12 developed specifically for such structures. The
13 standards provide a common framework of best
14 practices for a very diverse group of
15 institutions serving a very diverse student
16 population.

17 Let me share a few facts about DEAC.
18 Our institutions represent a very broad range of
19 educational marvels and missions. Some of our
20 institutions serve student enrollments of less
21 than 100, as well as institutions with tens of
22 thousands of students.

1 Our institutions may or may not offer
2 postgraduate degrees. They may serve to
3 introduce a student to a new field, or enhance
4 the skills of an existing professional.

5 Programs may be offered on an
6 asynchronous, purely distance learning model, or
7 according to a synchronous semester-based
8 calendar using online or hybrid models.

9 They may have completely open
10 admissions, or they may practice a selective
11 admission process.

12 One-third of our institutions are non-
13 profit, and some are tuition-free. Here are a
14 few examples.

15 WorldQuant University, a non-profit
16 foundation, supported institution, offers
17 tuition-free master of science and financial
18 engineering.

19 Students advance in a multidiscip-
20 linary field that combines financial theory,
21 mathematics, engineering, and quantitative
22 analysis to solving financial problems.

1 American College of Healthcare
2 Sciences, founded by one of the world's most
3 preeminent scholars in the holistic health
4 community.

5 A participant in Title IV, ACH offers
6 graduate degrees in integrative health and
7 nutrition. ACHS is a certified B-lab public
8 benefit corporation, and a certified Green
9 America business for its practice of
10 sustainability and reduction of its carbon
11 footprint.

12 Catholic Distance University, for over
13 30 years, has provided education in a flexible
14 and affordable way to Catholic scholars and
15 chaplains, including military chaplains based all
16 over the world.

17 And City Vision University, a non-
18 profit institution offering low-cost degree
19 programs and addiction counseling to social
20 purpose professionals who work for organizations
21 focused on alleviating hunger, homelessness and
22 addiction.

1 In DEAC's last approval for
2 recognition in 2017, higher education went
3 through a distance learning revolution, as many
4 institutions felt challenged to quickly pivot to
5 remote learning.

6 The pandemic brought about new respect
7 for distance learning, as well as a greater
8 understanding of its challenges and pedagogical
9 requirements, which has also been brought into
10 focus, would seem in a positive way is its
11 ability to open the doors to education for all
12 learners.

13 Fortunately as DEAC, we were able to
14 offer our expertise to help expand access to
15 quality distance education at a time when it was
16 needed the most.

17 In this regard, DEAC contributed to a
18 community of practice by supporting other
19 institutions, peers within the triad, and the
20 accreditation the community, as they shifted to
21 online teaching and learning.

22 DEAC shared its expertise in online

1 pedagogy, learner engagement, integrity of online
2 programs for sponsoring and participating in
3 online conferences and workshops on these topics.

4 We collaborated with a specialized
5 accreditor in the field of counseling, to offer
6 training and raise awareness of the emotional
7 stress being experienced by students.

8 We offered information sessions and
9 online training seminars to help accreditation
10 evaluators develop their distance education
11 assessment skills through our collaborations with
12 the Association of Specialized and Professional
13 Accreditors, known as ASPA, with the
14 International Network for Quality Assurance
15 Agencies and Higher Education (INQAAHE), and also
16 through online presentations, or CHEA.

17 I'd like to add that during this time
18 we also teamed with our website provider to
19 implement audio-on, a third-party provider of web
20 accessibility testing and monitoring, to enhance
21 and certify that the DEAC website is fully
22 accessible.

1 Our goal was not only to improve
2 accessibility of the DEAC website, but to also
3 support and advance the value of digital
4 inclusion among DEAC-accredited institutions and
5 other online education providers.

6 DEAC employs a comprehensive and
7 rigorous methodology for assessment and
8 benchmarking of its institutions.

9 You will have seen in our petition how
10 deeply this characteristic informs our standards,
11 and how those standards are applied.

12 The standards are reviewed on an
13 ongoing basis by the Commission, and the standing
14 committee that considers the relevance, currency,
15 validity, and reliability, of the standards.

16 Every five years DEAC engages outside
17 experts with experience in distance education to
18 conduct studies of our standards.

19 The last external study was completed
20 in 2017, and resulted in a number of
21 recommendations that were incorporated into the
22 standards. Our next review is scheduled for

1 later in 2022.

2 The hallmark of DEAC accreditation is
3 how it applies to standards to ensure education
4 quality across a broad spectrum of program
5 designs, to include programs where learning is
6 individually paced by students, and rigorously
7 assessed by faculty.

8 We strive to contribute our standards
9 and experience to this expanding body of
10 knowledge on new learning models that are
11 consistent with empowering students to engage in
12 flexible learning pathways, in the same way that
13 distance education already provides.

14 We are serious about applying our
15 standards rigorously, and about our role as a
16 Title IV gatekeeper.

17 DEAC requires any institution
18 interested in being accredited for Title IV
19 purposes, to undergo a separate certification
20 process which involves an individual assessment
21 of regular and substantive interactions that is
22 faculty initiated.

1 When we look at a substantive change
2 or a renewal of accreditation, we bring that same
3 process into every review.

4 Institutions seeking to participate in
5 Title IV must demonstrate that they have a
6 faculty and infrastructure to support the
7 requirement in the specific context of the
8 federal definition of distance education.

9 DEAC has deliberately set a
10 substantially lower limit on the percentage of
11 Title IV revenues that any one of our
12 institutions may access. That limit is
13 75 percent.

14 Our Financial Review Committee checks
15 the percent of Title IV revenue annually, to
16 ensure that institutions are below this limit.

17 Most of our schools are below
18 50 percent, as evidenced by the data presented in
19 DEAC's dashboard.

20 And when we go back for a next
21 assessment of these institutions, whether for
22 substantive change or renewal, we are not just

1 looking at policies for regular and substantive
2 interaction. We require proof through a sample
3 of student records, on a student-by-student
4 basis, that such interactions are occurring.

5 Our institutions receive a
6 comprehensive review every five years, and this
7 is an addition to regular monitoring of all
8 institutions on an annual basis.

9 I'd like to say just a few words about
10 our students. They're typically working adults
11 who may be operating under financial, geographic,
12 cultural or other personal challenges.

13 The majority of our students are
14 already employed in the field of their choice.
15 They may be seeking to enhance their skills, or
16 obtain credentials required for promotion and
17 greater opportunities.

18 The vast majority of our postsecondary
19 students are not first-time, full-time students.
20 Our analysis of the data shows that the 33,000
21 students listed in the accreditor dashboard for
22 DEAC are a mere fraction of the 800,000 students

1 that are enrolled at DEAC institutions.

2 DEAC has throughout its history
3 strived for excellence in its assessment of its
4 accredited institutions and operations.

5 DEAC schools contribute to workforce
6 development by providing high-demand career field
7 education, such as K-12 teaching, counseling,
8 engineering, business management and accounting,
9 finance, early childhood nursing, healthcare
10 administration, law, cybersecurity, and
11 international development.

12 I'd also like to briefly address the
13 specific issue of student outcomes. This term
14 has become an important focus of any discussion
15 on accreditation, serving as a rhetorical
16 flashpoint, a litmus test, and every other kind
17 of trigger for discussion.

18 It is also the term which serves us
19 shorthand, for a broad range of very disparate
20 concepts encompassing objective metrics like
21 graduation rates, employment rates, retention
22 rates, and enhancement of skills.

1 It also can encompass indirect
2 measures, such as professional growth, personal
3 fulfillment and student satisfaction.

4 The measurement of student outcomes in
5 almost every dimension is rarely simple or
6 straightforward. And in the field of distance
7 education, with such a broad range of learning
8 models, education missions and student profiles,
9 the complexity is multidimensional.

10 Despite this complexity, DEAC outcomes
11 are integral to assessing the effectiveness of
12 all aspects of distance education programs. This
13 includes curricula, faculty qualifications, and
14 learning management systems.

15 DEAC has procedures in place to gather
16 outcome data on every program on an annual basis.
17 It reviews that information for institution and
18 program effectiveness, and specifies required
19 actions, if needed.

20 DEAC also looks at the patterns and
21 trends of outcomes at the time when an
22 institution is being considered for renewal of

1 accreditation.

2 To demonstrate that outcomes are
3 appropriate and measurable, curricula must meet
4 academic standards of scope and content, be
5 mapped against student outcome goals, and be
6 developed using instructional precepts tailored
7 for distance learning.

8 Similarly, faculty are engaged not
9 just for their academic and teaching experience,
10 but for their ability to engage with students at
11 a distance, their commitment to being available
12 to students through multiple forms of
13 communication and across flexible time frames,
14 and that they demonstrate experience in teaching
15 and assessment of the learning outcomes.

16 DEAC expects its institutions to
17 implement and enhance their learning management
18 platforms, which support measurable student
19 progression, actual performance, observable
20 engagement and course materials, effective
21 communication, and the opportunity for social
22 networking for students.

1 We use our systems to interpret these
2 data through the lens of the DEAC standards, and
3 we assess effectiveness across comparable
4 institutions and programs.

5 In conclusion, preparing for the
6 submission and review of DEAC's petition for re-
7 recognition under the new regulations that went
8 into effect on July 1 was challenging, but also
9 resulted in improvement to DEAC procedures,
10 particularly in the areas related to student
11 protection, more detailed disclosures to the
12 public on accreditation decisions, and the
13 content and execution of teach-out plans and
14 teach-out agreement.

15 Working with and integrating the
16 comments provided in the preliminary Staff
17 analysis was both productive and valuable.

18 We're gratified to have received the
19 Staff recommendation to renew recognition for
20 five years, with the addition of direct
21 assessment to the scope of recognition.

22 DEAC feels deeply the responsibility

1 of being an accrediting agency recognized by the
2 Department of Education, and we will continue to
3 work diligently to honor that recognition. Thank
4 you.

5 CHAIR KEISER: Thank you, members of
6 the DEAC. The primary readers, Roslyn and David,
7 do you have questions for the Agency? Do you
8 have any, David?

9 (Simultaneous speaking.)

10 R. ARTIS: Good morning.

11 CHAIR KEISER: Good morning, Roslyn.

12 R. ARTIS: Just briefly, the focus
13 certainly seems to be on accountability for your
14 agencies. My question really has to do with
15 capability in terms of enforcement. So, the
16 adequacy number and sufficiency of that, in order
17 to effectively -- I don't want to use the word
18 police, but to ensure full compliance,
19 specifically as it relates to student learning
20 outcomes. Can you assess that a little bit, and
21 would you?

22 L. MATTHEWS: Sure. For the number of

1 institutions that we have, approximately 80,
2 there are eight full-time staff on our team at
3 DEAC. We also have three part-time staff that
4 support us as well.

5 I would also mention that DEAC
6 leverages a considerable peer corps of evaluators
7 that engage in our subject specialist review
8 process.

9 That process is attenuated to every
10 substantive change and the renewal of
11 accreditation process.

12 We believe that we've demonstrated not
13 just the staffing necessary to run the
14 organization, but also the resources and
15 financial support structures to carry out our
16 accreditation work.

17 I'll also ask if Dr. Hayek or
18 Dr. Nitsch would like to offer their remarks as
19 board members.

20 W. NITSCH: This is Wanda Nitsch. As
21 a commissioner, I'm ecstatic that the staff has
22 been extremely responsive to us as a commission.

1 They are organized, they present their
2 information they're conferring very thoroughly,
3 and I thought, from personal experience, very
4 difficultly, not being able to --

5 (Audio interference.)

6 W. NITSCH: -- have facilities on the
7 agencies.

8 C. HAYEK: I also think we use our
9 committees very well. I mean, Dr. Nitsch, you
10 can probably speak to the Academic Review
11 Committee. I mean, we pass everything around to
12 that peer review, the peers that review the
13 academics.

14 The things we pass to them for them to
15 review for their academic expertise, rather than
16 handing things to staff, the things that we pass
17 by your committee to review I think is important
18 in that regard as well.

19 So, I think we use the staff for what
20 the staff is needed for, and we use our academic
21 peers for what our peers are needed for. And I
22 think putting accountability where it belongs,

1 rather than tossing everything on staff, is
2 equally as important in this regard.

3 CHAIR KEISER: David, then Wally, and
4 then Mary Ellen.

5 D. EUBANKS: Good morning. And thank
6 you for that passionate presentation. You
7 touched on some topical issues that I think
8 really are important.

9 One is the growing need for adult
10 education that's convenient around, and the
11 other, which you didn't mention, that's in the
12 back of my mind, is sort of a growing crisis in
13 the public confidence in higher education.

14 And the two of those, those two trends
15 sort of focus my attention on student
16 achievement, which you've already talked about a
17 little bit.

18 I think there are some challenges that
19 you've acknowledge with how do we calculate some
20 simple number, like student achievement, for all
21 of these diverse programs, and so forth?

22 And I have some good things to say

1 about the presentation, but I wanted to get your
2 first reaction to the dashboard numbers, which
3 was just, even though it's a fraction of the
4 students, one that we can compare to, like four-
5 year public institutions or something.

6 The graduate rates are substantially
7 lower on average. I'm hoping to have a short
8 conversation about student achievement, so if you
9 can keep your answer brief, that would facilitate
10 it. Where it's appropriate, maybe Dr. Nitsch.

11 L. MATTHEWS: We have looked at the
12 dashboard data, and we see the same range of
13 graduation rate results that we think is
14 comparable to across the section of this data for
15 this particular report.

16 Our graduate rates in some instances
17 are low. They're ranging between approximately
18 22 percent at the lowest end, and 79 percent at
19 the highest end.

20 A lot of this depends on the program
21 type, the learner themselves as a first-time,
22 full-time student.

1 Our experience has shown us that
2 distance education tends to be the sweet spot for
3 the adult working professional, as opposed to
4 first-time, full-time student.

5 When we see those kind of data pop up
6 in our system of review, it certainly raises
7 questions for DEAC about the services, about the
8 admissions criteria, about the learning model,
9 about the curriculum and design, and the faculty
10 involvement in the students and their success.

11 You asked me to keep it short. I'm
12 happy to drill down into something more specific
13 about the dashboard.

14 But it is a certain point of
15 reflection about an agency's performance relative
16 to Title IV gatekeeping. It is something we pay
17 attention to.

18 D. EUBANKS: I appreciate that. I
19 appreciate that. Really, my follow-up is so --
20 under the deceiving dashboard data, a weighted-
21 average, which only represents 13 percent of the
22 exchange in the dashboard, because many of them

1 don't have Title IV, was about 34 percent
2 graduation rate versus 67 percent for public.

3 So, given all of your emphasis on data
4 and analysis, is it the case that distance
5 education is just more risky for students, or
6 more prone to not graduating? Or is there
7 something else going on there? It's inevitable
8 that the rates have differences, so substantial.

9 L. MATTHEWS: I think that there are
10 a multitude of factors at play here. I don't
11 believe it's because of the distance education
12 model itself. I think it's because of the
13 student's profile that is being served here.

14 Many of our students are coming from
15 circumstances that may be preventing them from
16 making the progress necessary to be successful
17 and graduate from their program.

18 We need to continuously look at those
19 data and answer for the type of questions we're
20 raising for accreditors today.

21 Again, for these institutions, there
22 are other sets of data for students that are not

1 representative of Title IV participating
2 populations.

3 And so, I think we have a different
4 view, based on how these institutions perform,
5 because of data that is not available in the
6 dashboard.

7 C. HAYEK: Yeah, I think that I would
8 just add to that, and this is -- data is the most
9 amazing thing. We are all, all of us together,
10 grasping at data 201. Right? We all want that
11 magic answer. But data in context, as you so
12 well alluded to.

13 And so, even though we look at these
14 items, IPEDS and all these numbers, as an
15 institutional graduate rate, what they really are
16 is, they're a student graduation rate.

17 And so, when I look at a public
18 college, a student graduation rate is an 18- to
19 21-year-old, typically, whose entire life's
20 dedication is being a student.

21 And so, that's what that graduation
22 rate really reflects, is a student who gets to

1 dedicate him or herself to being a student.

2 When I look at a typical DEAC
3 individual's graduate rate, it's a working adult,
4 mom, dad, who is soccer-mom and earning-mom, and
5 paying-bills-mom, dad, graduation rate.

6 And so, I think it's not the modality.
7 It's not necessarily the distance. It's the
8 person going through a divorce. It's the person
9 that's putting lunch and dinner on the table.
10 It's wanting my kids to dance and deciding, am I
11 going to do my homework tonight, or am I going to
12 help my child with their homework tonight.

13 And so, I think graduation rate is
14 student-based, even though we want it to be
15 institution-based. And I think we have to take
16 that multi-varied approach to what a graduation
17 rate really is, and I don't think we can pin it
18 on the modality, because it really is student-
19 centric.

20 It's not modality-centric, it just
21 happens to be that an adult goes to typically a
22 community college. So, we tend to see community

1 colleges have lower graduation rates.

2 An adult typically goes to distance
3 ed, so we see distance ed typically has lower
4 graduation rates.

5 But I don't think we can pin it on,
6 community colleges are bad, or, distance ed is
7 bad. If that makes sense.

8 D. EUBANKS: Sure. No, I appreciate
9 the complexity of the task and the diversity of
10 the possible outcomes.

11 I guess I'm trying to dig in to what
12 you -- you said quite a lot about gathering data
13 and analyzing it, and I'm just trying to dig into
14 that a little bit.

15 For example, one of the self-study
16 reports was a very small college that made, I
17 think, a persuasive argument that graduation
18 rates really weren't a useful metric for them,
19 and they were using course completion rates
20 instead.

21 So, have you, for example, done a
22 course completion study across institutions to

1 see what are the predictors if course completion
2 of graduation rate doesn't work? What do we know
3 about that?

4 C. HAYEK: Yes. So very famously, Dr.
5 Hagadorn, a famous institution researcher on
6 retention, used to believe that course retention
7 rates were the smallest measure of graduation
8 rates. The problem there is for adult learners,
9 it is very easy to start something very small and
10 retain in the beginning but longitudinally,
11 again, it's very difficult. Can I retain the
12 long haul. So in an adult situation, it's very
13 difficult to stay that long haul. So for an
14 adult learner, short-term completion rates aren't
15 necessarily predictive of long-term retention
16 rates.

17 And so DEAC, in fact, used to, in its
18 annual report, if I'm remembering, Dr. Nitsch,
19 way back in the day, we used to collect
20 completion rates and stopped doing that because
21 they weren't a predictive analytic that the, you
22 know, historical data used to think were for a

1 long-term retention unfortunately.

2 I appreciate the question though
3 because we thought the same, you know, decades
4 ago.

5 D. EUBANKS: Okay. Thank you for
6 that. I'm sort of still trying to -- I guess
7 what I'm taking from this is kind of we don't
8 know answers to some of the most important
9 questions. Let me dig into one aspect of that
10 that you mentioned the importance of the type of
11 student. Totally agree with that.

12 And I'm going to brag on your Standard
13 8 because you have some excellent language in my
14 comparison with other accreditors, some of them
15 are not explicit with this and just as a note to
16 my fellow NACIQI members, I think it's something
17 we need to look for.

18 So Standard 8 Part 3 says it's about
19 admissions practice. It says describe how the
20 admission -- the institution's admissions policy
21 assures that only students who are reasonably
22 capable of completing and benefitting from the

1 education offering are enrolled. That's a very
2 high standard and I think the lines of commission
3 have to get communicated. So what I'd like to do
4 then is connect that with your data to the
5 outcomes, because if we're only enrolling
6 students in the literal sense that are going to
7 succeed, then everybody would succeed. Nobody's
8 that good. But there are some very important
9 data elements in there linking the type of
10 student to the outcome, and I looked through that
11 in the self-studies, and I didn't see it. So
12 what did I miss?

13 L. MATTHEWS: These data points and
14 these graduation rates are sort of our starting
15 point to a deeper dive. And you pointed out a
16 very interesting feature of one of our standards
17 about assessing the student's ability to be
18 successful in a distance education program. I'll
19 tell you our institutions that are non-Title IV-
20 participating are able to do things like have
21 students take three courses before being
22 enrolled. Some of the parameters around Title IV

1 don't allow lending unless you're committed to an
2 entire program. And so I think one of the
3 features of our institutions is the kind of
4 testing they can do and practica they can do with
5 students before the students enroll. University
6 of the People is one such example where students
7 have to pass three courses before they're allowed
8 to matriculate into the institution itself.

9 We do take deep dives into admissions
10 criteria where we see that at the back end, the
11 data aren't supporting compliance with that
12 standard. A study of the quality of the
13 admissions standards may be required by the
14 commission. A review of the curriculum by one of
15 our subject specialists is positioning within a
16 learning management system may all be ways that
17 we take a deeper dive into why the institution
18 isn't getting the kind of data results that we
19 would like to see in terms of graduation rates.

20 D. EUBANKS: Thank you for that. And
21 of course, I could only see a little bit of what
22 was in -- just what was sent with the petition.

1 When I reviewed that section of the three
2 examples, you know, committee does that sort of
3 equivalent and report. I didn't see evidence of
4 the kind of data I would expect to see to analyze
5 an admissions cycle like, you know, the basic how
6 many applicants did we get, how many did we
7 accept, how many enrolled. That would be like
8 the starting point, and then within that, an
9 analysis perhaps of demographic factors that
10 connected to success; what sorts of students are
11 we enrolling that succeed. That would really
12 make that standard, I think, be very credible and
13 powerful for your agency.

14 Now I'm suggesting that maybe -- it
15 may be the case, as you're indicating, that
16 you're already doing this. It's just not in the
17 materials I received. That's quite possible.
18 But I'm saying it's clear but I can't -- I didn't
19 see that kind of data approach here. It looked
20 very superficial in the recruitment section, and
21 I was hoping to find connections to the student
22 achievement section.

1 I've just got one more question and
2 I'll turn it over to my colleagues. There's a
3 lot in the -- in your nice introduction not to
4 use improvement. Can you characterize, like on
5 an annual basis, what's the improvement rate in
6 student success for your institution on average?

7 L. MATTHEWS: I have to say I don't
8 have specific data on an annual rate of student
9 improvement in that regard. We do look year-to-
10 year at the annual reports, so we do look at the
11 graduation rates that are reported to us over a
12 period of time. So going back three, five years,
13 we can tack how an institution is reporting to us
14 on its institutional program rates. But at a
15 student level, I cannot say that we have that
16 data. Of course, we'd be interested in being
17 able to produce that kind of information. I'll
18 take that as a very helpful suggestion for DEAC.
19 One thing Dr. Nitsch mentioned in her remarks is
20 that we have recognized we want to improve not
21 just the practice of DEAC but support our
22 institutions. We are bringing on board an

1 institution researcher, a position. We're
2 narrowing down some candidates that have
3 submitted responses to our request for proposals.
4 You can see our proposal on our website, because
5 we do believe accreditors need to continually
6 improve and refine their practice of assessment.

7 D. EUBANKS: Thank you all for your
8 comments. I really appreciate it.

9 CHAIR KEISER: Okay. We now have
10 Wally first, Mary Ellen second, and Kathleen
11 third in terms of asking questions. So Wally,
12 you're up. You're muted, Wally.

13 W. BOSTON: Thanks, Art. So I
14 actually want to commend this agency on a couple
15 of things, and then I have a question. I think
16 it's commendable that out of 800,000 served that
17 you mentioned, that only 34,000 approximately are
18 participating in federal student aid and that you
19 have caps on what that percentage can be for each
20 member that decides to go through the process as
21 well as a separate process. And based on the
22 most recent dashboard, I see that only 25 percent

1 of students were receiving loans and 30 percent
2 are receiving PELL, so that's a little bit of an
3 imbalance compared to what we see in other
4 agencies, but that's to be commended.

5 And then this is sort of a
6 question/comment, and it may help David. I liked
7 your standard or criteria 8 as well on not
8 admitting people that weren't qualified. I
9 actually think -- I've been a big researcher in
10 online student persistence, as you may know, and
11 if you look at graduation and earnings for the
12 small percentage of your institutions that
13 participate in Title IV, you see that five are
14 listed in the lowest quintile, which is the break
15 point between the lowest quintile and the next
16 quintile is 33 percent. I think you mentioned
17 that you have the lowest institution at 22
18 percent graduation rate. But what is oddly
19 indicative of students swirling is that when you
20 go to the next item in that dashboard that gave
21 it in all of schools by graduation plus transfer
22 rate, those numbers in the lowest quintile

1 increased to 10, and the break point is 54
2 percent.

3 So it seems to me that one of the more
4 unreported factors that's just not collected
5 currently by the Department but is written about
6 by people at the forefront of looking at student
7 persistence in online is that you are getting a
8 substantial number of students who matriculate
9 but then leave to go to matriculate somewhere
10 else. When I look at the overall average, it's
11 not as dramatic as that. I guess I would ask if
12 you all have dove into that with your
13 institutions or if you know of any institutions
14 that are looking at it particularly and if
15 there's some type of an explanation. But
16 preliminarily, it appears to be that if these
17 students are able to transfer, which we're able
18 to track that through the Department that
19 clearly, they're qualified when they're
20 originally admitted. So any thoughts?

21 L. MATTHEWS: I think these are all
22 excellent points. To the extent we've been able

1 to look at this data since it was put online
2 three weeks ago, we've tried to analyze it
3 through the lens of our standards. Wally, I
4 think you've raised an issue that DEAC can
5 certainly benefit from looking at and doing that
6 analysis, how our students are receiving a return
7 on the investment through their Title IV loan
8 programs and what we can glean for institution
9 improvement and performance over time.

10 CHAIR KEISER: Mary Ellen?

11 M.E. PETRISKO: Thank you and good
12 morning --

13 CHAIR KEISER: You're breaking up.

14 M.E. PETRISKO: -- thank you for your
15 very detailed introduction to give us better
16 insight into how you've been operating and the
17 challenges that you faced and many of the
18 successes that you've had.

19 My question is I want to hear a little
20 bit more about the special -- if I understood
21 this correctly, Dr. Matthews, you talked about
22 special processes that you have for your Title IV

1 institutions. Could you say a little bit more
2 about specifically what those processes are that
3 you do with -- for those institutions or with
4 those institutions that you don't do for others.
5 And then my question is, if these are valuable
6 for those institutions, why you don't -- do those
7 across the board?

8 L. MATTHEWS: Procedures that we
9 implement for an assessment of regular and
10 substantive interaction, if I'm correct in
11 understanding your question, are just for those
12 institutions that want to participate in Title
13 IV. We treat entering the Title IV program as a
14 substantive change at DEAC. There is an
15 application to apply for DEAC certification to
16 participate in Title IV, but we receive an
17 application that presents to us how learning
18 management systems are structured to produce
19 evidence of regular and substantive interactions
20 that are faculty initiated.

21 The institution does a modest self-
22 study document on its practices that would

1 prepare it to be a participant in Title IV, and
2 then we send a team of experts to include a Title
3 IV expert to evaluate the institution. They
4 produce a report. That chair's report is given
5 to the institution for a response. And then the
6 entire package is given to the commission, and
7 they approve an institution for participation in
8 Title IV.

9 Now that doesn't apply to all
10 institutions because their learning models may be
11 correspondence course-based. Their learning
12 models are not designed for the type of regular
13 and substantive interaction that are defined in
14 the HEA. And so we allow for that flexibility of
15 institutions to be accredited based on
16 admissions, based on the learning model that they
17 may implement that is not necessarily geared
18 toward a compliance with regular and substantive
19 interaction.

20 M.E. PETRISKO: And for programs that
21 are not correspondence where one might anticipate
22 that that regular and substantive interaction is

1 important, is that looked at?

2 L. MATTHEWS: For non-Title IV
3 participating institutions

4 M.E. PETRISKO: Right.

5 L. MATTHEWS: Yes. I mean if that is
6 part of the learning model, if they are a
7 semester-based kind of calendar-oriented term or
8 a degree program, absolutely. We're looking at
9 those interactions between students and faculty,
10 that faculty are assessing student learning
11 outcomes, that interactions are demonstrated
12 within the management system. It's just that the
13 institution may not choose to participate in
14 Title IV. Perhaps they want the certification
15 because they want to participate in the veterans
16 benefit program or the Department of Defense's TA
17 program which requires Title IV certification.

18 So there are reasons why institutions
19 participate in Title IV, reasons that those
20 don't. We just offer a flexible process of
21 review in that regard.

22 M.E. PETRISKO: Okay. If I may ask

1 one other question? How have your operations and
2 what you've seen in your institutions'
3 operations been affected by COVID? Answers have
4 been different for many of the accrediting
5 agencies. We'd also read recently that a lot of
6 faculty and staff at institutions are being
7 affected by this in ways that they're dropping
8 out. What are you seeing as far as that's
9 concerned, and how are you responding to it?

10 L. MATTHEWS: Well, we are just now
11 completing our most recent round of annual
12 reporting for the 2021 calendar year and 2020
13 calendar year. We're not seeing substantial
14 drop-offs in completion in retention that we
15 thought we might see because of the pandemic. We
16 are hearing, anecdotally, of course, about
17 students experiencing disruptions because of
18 illness, because of work stoppage, because of a
19 lot of things that our students are experiencing.

20 But by and large, Mary Ellen, I have
21 to say that because of DEAC's mission and because
22 of the institutions that accredit, we didn't

1 experience some of the really acute difficulties
2 that I think other accreditors and their
3 institutions experienced. Our school stayed
4 open. Many of our students were able to
5 continue. So we're starting now to be able to
6 unpack those data as they come into our
7 organization in annual reporting and certainly,
8 we'll be getting a handle on how the pandemic had
9 any disruption within DEAC.

10 M.E. PETRISKO: Okay. Thanks so much.

11 L. MATTHEWS: Sure.

12 CHAIR KEISER: Kathleen and then Bob.

13 K.S. ALIOTO: In a piggyback on Mary
14 Ellen, you have 800,000 students in 80
15 institutions, and we were looking at much --
16 what, 19 institutions -- anyway, smaller number
17 of institutions on the dashboard. And you said
18 that some of them are correspondence, but what
19 are the other ones? What kind of institutions
20 are they? What are they teaching?

21 L. MATTHEWS: We have a pretty broad
22 cross section of institutions ranging from a

1 graduate program, a doctoral degree program
2 offering, a full spectrum of degrees. Some of
3 our institutions offer a competency-based
4 education program where students make pace kind
5 of on a schedule that they design individually
6 with their faculty. We do have a number of
7 institutions that are engaging in correspondence
8 course and to be honest, the paper-based
9 correspondence courses for some students with
10 special needs.

11 The spectrum of diversity, when it was
12 covered in our opening statements and within our
13 petition for recognition, I believe you can see a
14 list of our institutions as an exhibit to the
15 petition. But the spectrum is broad and very
16 diverse across the institutions we accredit,
17 particularly in size. Some institutions enroll
18 up to 180,000 students. Some institutions are
19 very small and specialized, 100 students or less.
20 We have a process that is scalable to address
21 that diversity of institutions within our ranks
22 of accreditation.

1 K.S. ALIOTO: Thank you and thank you
2 for your excellent presentation.

3 CHAIR KEISER: Bob, you're up.

4 B. SHIREMAN: Thank you and thank you
5 so much for your presentation and useful and
6 complete answers to the various questions. I
7 wanted to follow-up first on the graduation rate
8 questions brought up by David and Wally. I
9 sometimes worry about -- I hyper focus on
10 graduation rates as it can cause institutions
11 that either graduate people who maybe didn't meet
12 standards or cause institutions to exclude a lot
13 of people who could succeed but might lead to a
14 lower graduation rate and which is one of the
15 problems with, what, being too focused on only
16 enrolling students who you think will graduate.
17 That's the excuse that elite colleges use for
18 excluding a lot of low income and minority
19 students.

20 For me, I feel like one of the ways
21 that I address this is by thinking about cost. I
22 don't want people to take on a lot of debt or pay

1 a lot of money if they're likely to be -- to
2 dropping out. How do you or do you kind of
3 balance those things so that the issue of cost
4 and debt in relation to open access or, you know,
5 just letting anybody in?

6 L. MATTHEWS: So for many schools at
7 DEAC, they have open admissions and they are not
8 Title IV. Students pay as they work their way
9 through a program at their own pace. And so in
10 those instances, there's minimal debt. For Title
11 IV-participating institutions, of course, we're
12 paying as close attention as we can to the
13 results such as those published in the dashboard.
14 We may ask questions about the return on
15 investment if we see that there is a minimal
16 graduation rate but high debt load. We haven't
17 seen that particular trend pop up for DEAC
18 schools, but we do watch the data, especially
19 some of gainful employment data results that are
20 coming forward from DEAC institutions.

21 As I mentioned in my opening remarks,
22 you know, the outcomes assessment process is

1 multifaceted. It takes into consideration a lot
2 of different things. We do use data as some of
3 our starting point, but we're continually looking
4 at how we can bring about improvement for our
5 institutions and bring about improvement in some
6 of these graduation rates. They are on top of
7 mind for any accreditor in terms of their
8 effectiveness and accountability.

9 B. SHIREMAN: Thank you. As you may
10 know from prior NACIQI meetings, I often ask
11 about public members, and you were kind enough to
12 have one of your public members as part of the
13 presentation today. And I think I recall reading
14 in your materials that you actually have more
15 than the minimum required public members as part
16 of DEAC. But I did want to channel Anne Neal.
17 She's no longer part of our group. I did notice
18 that your public members are all kind of
19 academia, part of academia. Public members could
20 potentially be more consumer-oriented so
21 interested in your kind of philosophy toward the
22 role that you want your public members to be

1 playing.

2 L. MATTHEWS: Historically, we've
3 drawn from business and industry. We had a
4 Disney executive serve as a public member for a
5 while. We've had accountants from Price
6 Waterhouse Coopers serve as a public board
7 member. These individuals are part of our peer
8 core of evaluators, so they help us with our
9 evaluation process and subject specialist
10 reviews.

11 Right now I think we have an excellent
12 of public representation in terms of no
13 affiliation with DEAC and some experience in
14 higher education. I'm pleased with the
15 productivity and commitment and understanding of
16 accreditation that our public members bring to
17 our process. I think that they are pretty
18 diverse in terms of their experience whether a
19 CPA, whether in practicing law and overall, I
20 think they balance out our process in an
21 effective way.

22 We have a public member who is vice

1 chair, Dr. Nitsch with us, and also Dr. Hayek. I
2 invite them to make any comments they would like
3 to share about DEAC's view on public members and
4 their participation.

5 W. NITSCH: I'll speak as a public
6 member on the commission. And I really
7 appreciated DEAC's process in bringing on the
8 public members. There's a nominating committee
9 who reviews your submission and asks you
10 questions, and they are definitely focused on not
11 necessarily just are you in higher education, but
12 what is your focus on student success and student
13 experiences. And I thought that that really
14 helped you to focus as a public member on that
15 very important point. And we have -- and when
16 you think of the five members that we have, they
17 come from such a broad section of industries that
18 it helps us to definitely look at different
19 perspectives when we're making our decisions.

20 C. HAYEK: Yes. I would just add to
21 that that it not only goes institutional and
22 public but public and when their rotation of --

1 when they're up in public, so who's coming off
2 and who's going on, you know, and so we think
3 about that balance as well. And I really feel
4 honored by who's been on and the difficult
5 decisions we've had, to have all of their
6 expertise when we make decisions, so it's worked
7 well.

8 B. SHIREMAN: Thank you. I really
9 appreciate that Leah mentioned Disney and
10 employers. I do think of employers as being some
11 of the most important consumers of higher
12 education. We tend to think of the students as
13 the consumers but in -- but really, even more
14 than that, employers and the community are the
15 ones who are wanting their people, their
16 employees and their citizens to be well educated,
17 so I really appreciate that perspective.

18 I wanted to ask. It looked, from your
19 narrative, that you have a quite welcoming and
20 inviting approach to complaints about schools on
21 your website and your general approach. Am I
22 right in understanding that you will accept a

1 complaint whether it's electronic or mailed in on
2 paper; is that right?

3 L. MATTHEWS: Yes.

4 B. SHIREMAN: And if a complaint
5 relates to your standards but the person has not
6 provided, you know, full documentation or you
7 need more information to figure out how to
8 follow-up, what would do? What is your approach?

9 L. MATTHEWS: Our approach to pretty
10 much any complaint, Bob, is to investigate it, to
11 get a report from the institution on the issues
12 raised in the complaint, to look for patterns.
13 If this complaint is signaling more than one
14 student, more than one identification of an issue
15 with an institution, then we may direct a visit
16 or we may take a closer look at the complaint.

17 We treat complaints very seriously at
18 DEAC. I look at every single one and work with
19 my staff on crafting a request to an institution
20 for a response to that complaint. We look at it
21 together and determine if additional information
22 is needed, and then we communicate back to the

1 complainant about the results of our analysis and
2 review. We allow the complainant to come back to
3 us if they think that's necessary, and sometimes
4 they do. Sometimes they don't agree. Sometimes
5 they present new information.

6 We try to work through that as quickly
7 as possible. We require returns on any
8 advertising complaints within 15 days.
9 Typically, our process is wrapped up between 60
10 and 90 days.

11 B. SHIREMAN: I imagine that you run
12 into cases where the complainant is not familiar
13 with what accreditation standards are, and they
14 may not accurately determine like which standard
15 their complaint associates with. How do you
16 handle those situations?

17 L. MATTHEWS: We may go back to the
18 complainant for more details about their
19 concerns. Again, we may ask the institution for
20 information about how they are addressing an
21 individual's academic progress, the services that
22 they're expending to the complainant, what type

1 of effort has been made on the part of the
2 institution to help resolve the student's
3 complaint, and try to bring it to closure as best
4 that we can.

5 You're right, sometimes students
6 complain about issues that are outside the scope
7 of accreditation. But student experience is
8 student experience in one of our institutions.
9 We're going to try to make the best effort we can
10 to try to resolve things for a student.

11 B. SHIREMAN: Thank you. Some of the
12 most problematic predatory practices are around
13 recruiting and frequently, the issue is not so
14 much that an institution has outright lied,
15 because kind of that's easy to catch, but it's
16 kind of over-aggressive and manipulative kind of
17 approaches to recruiting, failing to tell people
18 things that might be useful to them. It looked
19 to me like your recruiting policies go much
20 further than a lot of other accreditors'
21 recruiting policies go. Can you tell us a little
22 bit about your -- what you've adopted there for

1 your standards?

2 L. MATTHEWS: Those standards are
3 built into a culture of review at DEAC that
4 includes an ethical business standards
5 practitioner as part of our review. We have
6 evaluators that specialize in looking at
7 advertising and recruitment practices. We train
8 them, and we put our schools through a
9 comprehensive review of all advertising
10 materials, information they share on their
11 websites, information that is presented to
12 students that they're making that decision to
13 enroll.

14 You know, we can't control for
15 everything our institutions may produce on their
16 websites but annually, as part of our annual
17 review, we take a look at institution website
18 advertisements. And we're enforcing those
19 standards as part of any substantive change on a
20 5-year review cycle.

21 I have a strong level of confidence in
22 how those standards have been effective. We have

1 minimal complaints, so I've felt pretty satisfied
2 with our process in how our standards are
3 functioning for advertising and recruiting.

4 I'll also add that our institutions
5 have a website checklist, an enrollment agreement
6 checklist, and catalog disclosures checklist to
7 make sure that they are mapping to each of the
8 requirements in those standards.

9 B. SHIREMAN: I really appreciate
10 that. My last question. You mentioned that
11 complying with the new regulations was
12 challenging but obviously, you did it. You got a
13 clean bill of health from the staff in any case.
14 Did you find that Westinghouse Entenmann the
15 staff had a question about some additional
16 information they needed or a document that they
17 needed that it was clear what they wanted and you
18 were able to provide it?

19 L. MATTHEWS: Absolutely. We were
20 fortunate to work with Dr. McKissic and Paul
21 Florek. They communicated to us in a very clear
22 manner the requirements or the recognition

1 criteria. Upon receiving the draft staff
2 analysis, they were collaborative as DEAC worked
3 through the different steps it needed to take to
4 provide additional evidence and clarification to
5 include another round of reviews and edits and
6 call for comments on our accreditation handbook
7 and documents.

8 We truly appreciate working with the
9 Department staff. We recognized that this was
10 going to be complicated from the beginning, and
11 so we've certainly given it our focus and
12 attention over multiple years, as Dr. Hayek
13 mentioned in her opening comments.

14 B. SHIREMAN: Thank you so much.

15 CHAIR KEISER: Claude?

16 VICE CHAIR PRESSNELL: Yes. Thank you
17 and thank you for your presentation. We got back
18 into the graduation rates and it brought to my
19 mind -- I was curious about your student
20 mobility, students who may actually transfer out
21 of these institutions into other institutions and
22 how that is worked in terms of accepting as a

1 credit, the smoothness of the student mobility,
2 and whether or not it differs by different
3 modalities, you know, such as is competency
4 based, education a little more restrictive in
5 terms of being received by another institution.
6 So if you could talk a little bit about distance
7 learning and out transfers?

8 L. MATTHEWS: We haven't detected any
9 difficulty due to modality when it comes to
10 transferring credits. I'll be honest, the
11 biggest barrier to students being able to
12 transfer their credit is a reluctance to accept
13 accreditation from an institution that doesn't
14 have historically regional accreditation.

15 From what we have seen where our
16 institutions are successful in articulation
17 agreements with other institutions, there's a
18 smooth process for students that want to transfer
19 into another degree program or apply to a
20 graduate study in their chosen field or
21 profession. We've noticed that that's mostly
22 successful at a local level when an institution

1 has a good relationship with other institutions
2 offering similar programs.

3 Transfer of credit is an issue that we
4 work on almost every day. We're trying to do our
5 best work to represent the DEAC as a reliable
6 authority on education quality. This process
7 helps us do that, and we're going to continue to
8 focus on how we can help our students with
9 transfer of credits and admission to graduate
10 programs.

11 VICE CHAIR PRESSNELL: Thank you.

12 CHAIR KEISER: Zakiya, I see you have
13 a question.

14 Z. SMITH ELLIS: Yes. I'm just going
15 to -- want to follow-up on two previous
16 questions, one about graduation rates and
17 acknowledge that your student population, you
18 know, has a lot of things going on in life, and I
19 think that is true of many colleges that serve
20 adult students. Do you kind of think about
21 benchmarking your colleges that serve those
22 students to similar kinds of colleges? Or how do

1 you think about making sure because there are
2 differences in, you know, being able to support
3 students that have a lot going on, that are
4 working, have kids, etcetera? So that's my first
5 question.

6 L. MATTHEWS: To the extent that we
7 can, of course. We want to look at comparable
8 data sets. We want to work within what's
9 available to the public through dashboards,
10 through the college scorecard. We gather our own
11 data through the annual report that helps us do
12 those types of assessments, and we also look at
13 institution mission and the student profile being
14 served by those institutions, how they're
15 offering appropriate services, if they are
16 enrolling a population of students that have
17 disadvantages, that may have difficulties in
18 prior learning experiences, to help them be
19 successful.

20 Z. SMITH ELLIS: Thank you. And the
21 second question is around the complaints as well,
22 just following up on Bob's question. You really

1 noted the kind of thorough way that you're
2 looking at complaints. And I'm wondering what
3 measures -- if you could -- it might have been in
4 the materials but I'm kind of new and so I was
5 just trying to clarify like what measures do you
6 have in place that address any deficiencies in
7 the complaint process at an institutional level?
8 So for instance, if you found that there was an
9 issue or concern that wasn't appropriately
10 addressed, how would you kind of rectify that?

11 L. MATTHEWS: At an institution's
12 level, ahead of every assessment visit, we
13 request an email list of currently-enrolled
14 students and we directly communicate with
15 students through that list or survey their
16 experience with the institution to include
17 whether or not they have access to the
18 institution's complaint process, whether they
19 understand how to find it, and whether there are
20 any student satisfaction issues related to
21 services, academics, and the overall experience
22 with the institution. Using that information, we

1 can start to look more deeply at any compliance
2 concerns that are coming as a result of the
3 student survey tool that we use to have
4 appropriate assessments.

5 Internally, at DEAC, my staff are
6 tracking complaints that come to us. We look at,
7 again, as I mentioned to Bob, any patterns of
8 repeat complaints about an institution or a
9 program over a period of time. We share that
10 with our evaluators. If they are going out to
11 review a substantive change or renewal of
12 accreditation, we look at our own information on
13 student complaints.

14 Lastly, our institutions are required
15 in a self-study to provide the files of any
16 internal student complaints they have received,
17 how they have resolved them, and our evaluators
18 determine if any closer examination of those
19 complaint issues need to be processed for renewal
20 of accreditation.

21 CHAIR KEISER: Thank you, Dr.
22 Matthews. Seeing no more questions, I'd like to

1 invite Paul to come back and have any comments
2 about the agency's testimony.

3 P. FLOREK: Thank you. Nothing
4 further on my end.

5 CHAIR KEISER: Then I would like the
6 two primary readers to come forward and make a
7 motion.

8 D. EUBANKS: Roslyn, would you like me
9 to do that?

10 R. ARTIS: Yes, please.

11 D. EUBANKS: Okay. I'll make the
12 motion. If it's seconded, then maybe I can
13 comment. I move that the NACIQI recommend that
14 the Senior Department of Special Grants for
15 Business Education Accrediting Commission renew
16 the recognition and recommend a monitoring for
17 the year and to be reviewed by department staff,
18 ensure that corrective action is taken and full
19 compliance is achieved for the substance and --
20 substance of and alignment between
21 602.16(a)(I)(i), student achievement, and
22 602.16(a)(I), Roman numeral VII, recruiting and

1 other practices, or for action by staff under
2 602.33 if not, and I'm happy to place that in a
3 chat if that's convenient for the typers. Right
4 now the chat's disabled so I'm unable to do that.

5 CHAIR KEISER: Is there a second to
6 David's motion?

7 B. SHIREMAN: I'll second.

8 CHAIR KEISER: Second by Bob Shireman.
9 Now is time for discussion.

10 D. EUBANKS: If I might, Art, just
11 describe the rationale?

12 CHAIR KEISER: Please. It was a
13 little surprising.

14 D. EUBANKS: Right. Sure. And it's
15 surprising because I think under the way that we
16 are used to doing business and the way the
17 Department's used to doing business, the agency's
18 done everything that's due. That's why they got
19 a clean slate.

20 The issue I'm trying to raise is
21 related to Undersecretary Kvaal's admonition of a
22 used data to understand worlds of the per

1 student, you know, outcomes. And I think that's
2 pertinent here. We saw in February an agency
3 that really took the link between student
4 achievement and student recruiting seriously and
5 had a very sophisticated way to approach that.
6 And it was a specialized accreditor; doesn't
7 really translate very well to this very
8 heterogenous group, but the same philosophy can
9 be applied.

10 So when I looked at the student
11 recruitment stuff, as I mentioned, the data that
12 would support compliance with an institution
13 looking at that standard and trying to make an
14 argument simply isn't there. And I think we saw
15 in the discussion the data-oriented questions
16 that are super important not just for this agency
17 but for the rest of education going forward are
18 not really being answered.

19 So I don't normally proceed this way,
20 but this is a preliminary measure to the agency,
21 because I think it's a very sound organization
22 that's doing great work, and this is just a nudge

1 that we need to take that to the next level.
2 Instead of not only just talking about use of
3 data analysis needs continuous improvement, that
4 needs to show up in the most important
5 intersection, which is between recruitment and
6 achievement. We have to understand that if we're
7 going to make progress on student achievement and
8 the public confidence crisis.

9 CHAIR KEISER: Wally, you have a
10 question. Then I have a question. And then --
11 actually, Wally, Claude, and then myself. Wally?

12 W. BOSTON: Sure. Thanks. So I guess
13 my question is, David, I appreciate the
14 thoroughness with which you've reviewed this, but
15 this wasn't a recommendation by the Department.
16 So is -- and as, you know, our recommendations
17 are advisory, so the Secretary doesn't have to
18 accept them or they can accept them. I'm just
19 curious if you're looking to get greater
20 specificity in reviews, so we may hear this from
21 you on all the agencies or if you think this is
22 specific to this agency?

1 D. EUBANKS: Great question. No. I
2 don't think it's specific to this agency. I
3 think this agency does a good job in comparison
4 to most, and what -- you know, the trend I saw in
5 the subcommittee on student achievement was
6 agencies like to talk about data use, but when it
7 comes down to the analysis of student achievement
8 and actual improvement of it and the link to
9 recruiting, it's not there for a lot of them. It
10 is for a very few, but -- so if we're going to
11 provide some sort of helpful advice to the
12 Department to think about the standards, the
13 adjudication of those standards to make progress,
14 this is the sweet spot I think.

15 CHAIR KEISER: Claude, then Roslyn.

16 VICE CHAIR PRESSNELL: Yes. So kind
17 of, you know, playing off that as well, I'm
18 concerned. I mean, David, you're saying --
19 they're out of compliance is what you're saying,
20 and I have difficulty with accepting that motion
21 of out of compliance. This may be the good spot
22 to put it in the comment area. Like if you want

1 to take a vote and say however much you'd like to
2 have the Department look more clearly at one
3 thing. I don't get the sense that the agency is
4 out of compliance, and your motion seems to
5 indicate that they are out of compliance. And so
6 --

7 D. EUBANKS: Well, yes, I mean they're
8 clearly out of compliance with the recruitment
9 standard in that the Part 3 is not supported by
10 evidence from peer reviews. There's no evidence
11 as far as I can tell that institutions are being
12 challenged to show that only students who are
13 reasonably capable of completing and benefitting
14 are being enrolled. I mean --

15 VICE CHAIR PRESSNELL: Okay. Well
16 let's (Simultaneously speaking) --

17 D. EUBANKS: -- I know I'm disagreeing
18 with part of the staff here, but I don't see it.

19 VICE CHAIR PRESSNELL: Okay. And
20 yes, that's a good point but I think -- so let's
21 go back to Paul Florek and say, you know, help us
22 understand why you did not see this as something

1 that was out of -- that the agency was out of
2 compliance, cause I'm very interested in trying
3 to make sure that we do have consistency in our
4 decisions. And back to the previous observation,
5 David, are you thinking that this may be a
6 finding you have with every agency under review
7 this -- during the -- you know, our meeting this
8 month or?

9 D. EUBANKS: Very quickly, no.

10 VICE CHAIR PRESSNELL: Okay. I
11 thought you had said yes. So --

12 D. EUBANKS: Yes, Claude. Yes for the
13 big regional accreditors that handle the most
14 cases, I think it might be an issue but.

15 VICE CHAIR PRESSNELL: Got you. Okay.
16 Well, so could we hear from Paul in terms of your
17 reaction to this?

18 P. FLOREK: I'll just cover that
19 (audio interference) found that the agency was in
20 compliance with regard to student achievement and
21 with regard to recruitment. I think that if
22 you're wanting to have a conversation about

1 whether or not specific benchmarkable numbers are
2 appropriate for evidence of compliance with that
3 regulatory requirement, I think that goes beyond
4 what is contained within the regulations. So I
5 think that the Department's staff recommendations
6 stands as it is. And maybe if Stephanie would
7 like to comment, she is also on the call.

8 S. MCKISSIC: Yes. I just want to
9 kind of ditto what Paul has just said. When we
10 reviewed this agency for compliance with that
11 regulation, we -- as you all know, we, as the
12 Department staff, we go strictly by what we are
13 statutorily required to review. Any additional
14 information or -- pertaining to the agency's
15 requirement of an institution is directed to the
16 agency. So we did find this agency in compliance
17 with what was regulatorily or statutorily
18 required of it to conduct in terms of its having
19 a standard and implementing that standard
20 accordingly.

21 CHAIR KEISER: Roslyn?

22 R. ARTIS: In a rare move, I will

1 disagree with David, and I've shared that with
2 him. I think the agency is in compliance. I
3 have very serious concerns with identifying this
4 bright line in their standard because I think it
5 (audio interference) everything we know about
6 assessments. There is some variation in the
7 profile of the student particularly as it relates
8 to this particular accrediting body, and it reeks
9 of sort of making an example of an accrediting
10 agency that doesn't deserve it, quite frankly. I
11 mean they've done a very good job documenting.
12 And I think the fact that you don't like the, for
13 example, graduation rates and are attributing
14 that then to a failure of recruitment, I think,
15 is an overreach, overly broad, and punitive to
16 this agency.

17 CHAIR KEISER: Bob?

18 B. SHIREMAN: I think this is a -- I
19 think what David brings up is an interesting
20 topic for the SDO to think about, so I like the
21 idea of kind of putting the information out there
22 for the SDO to consider. I could go either way

1 on whether it is part of the motion or a comment
2 that David includes and that those of us who want
3 to could affirm the comment about, you know,
4 wanting the agency to look into this.

5 D. EUBANKS: Ad Art, I think my
6 point's been made. I'm sensing the committee is
7 not behind me on this. I'm happy to withdraw the
8 motion to speed things up, I think, for --

9 CHAIR KEISER: I'll accept that. That
10 way, there's not a challenge of that motion. So
11 the motion has been withdrawn. Is there an
12 alternative motion?

13 B. SHIREMAN: I'll move to accept the
14 staff recommendation to reaffirm the DEAC.

15 CHAIR KEISER: The motion by Bob to
16 accept the staff recommendation. Is there a
17 second?

18 W. BOSTON: I second.

19 CHAIR KEISER: Second by Wall. Any
20 further discussion?

21 B. SHIREMAN: I just wanted to confirm
22 that we'll be able to make David and/or others --

1 we'll be able to make comments when we vote as
2 well, right?

3 CHAIR KEISER: I did ask. The agency
4 will comment on that. You know, I don't have a
5 problem with it, but we'll see what OGC says.

6 G.A. SMITH: Or is it fine for OGC to
7 make that -- those comments now? Would you be
8 fine with that?

9 CHAIR KEISER: The agency could make
10 a comment.

11 G.A. SMITH: All right. So we have
12 Angela from OGC who's going to comment on Bob's
13 question. Go ahead.

14 A. SIERRA: Hi. Yes. This is Angela
15 Sierra from OGC. At the last committee meeting,
16 Mr. Shireman did raise some questions about
17 committee members being able to provide
18 commentary along with their votes for
19 consideration by the SDO, the Senior Department
20 Official.

21 So I just want to note that I don't
22 think that there's any problem with that, but

1 602.34(f) of our regulations does require that
2 there be a motion by the committee on
3 recognition, and 602.34(g) requires that there is
4 a recommendation by the committee to the Senior
5 Department Official.

6 That said, there should be no problem
7 providing commentary alongside a vote. There
8 would be logistical problems with the staff being
9 able to transcribe that in realtime, but the
10 transcript which is provided to the Senior
11 Department Official as part of their record would
12 reflect any commentary along with the vote. I
13 hope that answers the question.

14 CHAIR KEISER: Does for me. Wally and
15 Claude had their hands up.

16 W. BOSTON: Let me make sure I'm not
17 on mute. Yes. So I guess -- I know we don't
18 have a block for it in Monica's little
19 spreadsheet, but I am in support the comment way
20 to do this. So I don't know if we can check, you
21 know, agree with David's comment or disagree with
22 his comment as part of the vote. I see we have a

1 little grid here, you know, or we just do it and
2 since the transcript's recorded, people will note
3 how many people commented?

4 CHAIR KEISER: It will be in the
5 transcript and the Secretary does get the full
6 transcript. Claude, and Jill, and then I'd like
7 to move to a motion -- move to vote. And we can
8 hear comments, but they need to be short.

9 VICE CHAIR PRESSNELL: You bet. No.
10 I just -- again, the transcript is provided to
11 the SDO. We have had discussion about some
12 additional like a minority opinion or additional
13 comments. I'd like for us to get that resolved
14 at some point in time that we, you know, we might
15 put a special note that we would like the SDO to
16 especially review the transcript related to this
17 vote.

18 CHAIR KEISER: Thank you. Jill and
19 then Zakiya [pronouncing ZA-KI-A] -- Zakiya
20 [pronouncing ZA-KEE-A]. Keeping trying to say
21 Zakiya [pronouncing ZA-KI-A]. I am so sorry.

22 J. DERBY: Yes. I appreciate that

1 David's raising that point and although I
2 understand that I think it's important to go with
3 the Department's recommendation here, our staff
4 recommendation, I'm very pleased that he raised
5 it. I would add my support for the comment, and
6 I hope we'll -- we can talk about maybe some
7 follow-up as well because I think this is an area
8 we might want to have further discussion on.

9 CHAIR KEISER: Okay. Zakiya.

10 Z. SMITH ELLIS: Thank you. I don't
11 have any issues with the motion as presented on
12 the comment portion. I agree that it would be
13 good to have some kind of notation, and I would
14 just add though since these meetings, as far as I
15 know, have always been transcribed, if there's
16 not a separate way to have a comment that's
17 associated with a vote that is delivered, you
18 know, kind of specifically along with the vote,
19 then it kind of defeats the purpose of having a
20 special comment piece, because it wouldn't really
21 be any different than what the committee has
22 already been doing. So I would suggest that we

1 figure out a way -- and I'm, you know, again, not
2 necessarily specific to this because I don't have
3 any issue with this. I think I don't want to
4 make my comment, you know, be something about
5 this particular agency but just as a global point
6 about the technical nature of it, I think we
7 should find a way to associate it with the vote
8 but don't need to do that in this very moment for
9 this particular agency personally.

10 CHAIR KEISER: Okay. I don't disagree
11 with you Zakiya. I do think if let's say you
12 agreed with David's analysis, you could say that
13 after your vote --

14 MALE SPEAKER: Or reviewed it.

15 CHAIR KEISER: -- am I on?

16 MALE SPEAKER: It looks like we can't
17 hear you, Art.

18 Simultaneous speaking.)

19 FEMALE SPEAKER: I can hear him.

20 FEMALE SPEAKER: I can hear him fine.

21 MALE SPEAKER: Yes. I can hear --

22 FEMALE SPEAKER: I can hear him fine.

1 CHAIR KEISER: And some of you might
2 not want to hear me, but what I'm suggesting is
3 that if you agree with David or anything that's
4 been discussed, you can make that in your vote
5 and just say "I support that position" beside the
6 yay or nay. Okay. Any other discussion? If
7 not, let's go to the vote. Monica, I think a
8 roll call is in order.

9 A. SIERRA: Excuse me. Mr. Keiser,
10 can you just identify what the motion is, just --

11 CHAIR KEISER: The motion is to
12 approve the staff recommendation on five year
13 recognition.

14 A. SIERRA: Thank you.

15 CHAIR KEISER: Monica? Monica, do you
16 want me to read the roll call? George? Someone?

17 MALE SPEAKER: We may be having audio
18 problems so Art, you might want to just --

19 CHAIR KEISER: I might go down. Okay.
20 Kathleen? Kathleen, you're muted.

21 K.S. ALIOTO: Yes. With support of
22 David's analysis.

1 CHAIR KEISER: Okay. Roslyn?

2 R. ARTIS: Yes.

3 CHAIR KEISER: Jennifer? She's not
4 here. Ronnie? Wally?

5 W. BOSTON: Yes. And then I support
6 David's comment as it regards all agencies, not
7 just this specific one.

8 CHAIR KEISER: Jill?

9 J. DERBY: Yes, and support for
10 David's analysis.

11 CHAIR KEISER: David?

12 D. EUBANKS: I have to vote no on
13 principal and see my comments from earlier.

14 CHAIR KEISER: Okay. Michael?

15 M. LINDSAY: Yes.

16 CHAIR KEISER: Molly?

17 M. HALL-MARTIN: Yes, with support for
18 David's comments.

19 CHAIR KEISER: Mary Ellen?

20 M.E. PETRISKO: I'm sorry. I was --
21 I double-clicked. Yes. And I support David's
22 comments, and I would like to comment further

1 that as I look at the regulations and look at our
2 work, I just think that we need to keep in mind
3 that the whole is greater than the sum of the
4 parts. And when we look at these regulations
5 one-by-one, we might get a picture that's
6 somewhat different than when we start to compare
7 things across these areas' points of concern.

8 I think the fact that this agency was
9 so vague, as I noted and as others noted, was so
10 very specific in what the requirements were for
11 recruitment, that the difference between that
12 requirement and certain graduation rates, even
13 given that population, at least raises questions
14 of how those two items are looked at together.
15 And it is a larger question for all agencies.

16 So that's the long way to say -- long-
17 winded way to say that I do agree that this is
18 something that bears greater consideration, and I
19 think for our work in general to remember the
20 whole is greater than the sum of the parts and
21 just going into the details regulation-by-
22 regulation, which the staff does and does very

1 well, is the foundation for us to take a bigger
2 look. And I think that's what David was doing,
3 and I think that others have agreed we should be
4 doing in this case. Thank you.

5 CHAIR KEISER: Some of you -- Monica,
6 you did not put a "no" for David Eubanks? Okay.
7 Claude?

8 VICE CHAIR PRESSNELL: Yes.

9 CHAIR KEISER: Bob?

10 B. SHIREMAN: Yes, and agree with the
11 issue David has raised. I think a lot of other
12 agencies could learn from this agency in terms of
13 some pretty good policies that are aimed at
14 protecting students and assuring a quality
15 education and that a closer look at the issues
16 that David raised would be educational for all of
17 us.

18 CHAIR KEISER: Zakiya?

19 Z. SMITH ELLIS: Yes.

20 CHAIR KEISER: Steven?

21 S. VAN AUSDLE: Yes.

22 CHAIR KEISER: Okay. Motion passes.

1 We've had a long morning. We have one more
2 before lunch is at 1:30, so I'm -- I have to
3 recuse myself from this. Are there any other
4 recusals on ACOTE?

5 J. DERBY: Art, can we take a break
6 here? You know, it's been 2-1/2 hours.

7 CHAIR KEISER: I would disagree with
8 you but I'm going to let Claude make that
9 decision as I fall out from recusal. Is -- are
10 there any other recusals? If not, I am going to
11 -- I'm going to take my camera off and I'll mute
12 and turn it over to Claude.

13 VICE CHAIR PRESSNELL: You know, I'm
14 happy to take a look at the will of the
15 committee. I mean we could do lunch now. The
16 plan was this gives us an hour to review this
17 agency, but I'm happy to do lunch now. We'll do
18 two this afternoon so.

19 B. SHIREMAN: Or five minutes now,
20 either one?

21 VICE CHAIR PRESSNELL: Yes. Let's --
22 and someone go ahead and notify, you know, Art.

1 Let's go ahead and do our 30-minute break, and
2 then we'll come back and we'll pick it up. So
3 this will be your lunch break or late breakfast
4 break wherever you are.

5 R. ARTIS: You want to take a 30-
6 minute break now? I thought we kind of needed a
7 5-minute bio break and then stay on task with the
8 agencies prior to a full lunch. I think that's
9 what everyone is saying.

10 VICE CHAIR PRESSNELL: Yes. I'm fine
11 with that, but you're cutting into the review
12 time. So we'll probably go a little bit late.
13 We only have an hour to review this. So okay,
14 let's -- I'll back up, five minutes. We'll see
15 you all back here at 20 minutes before the hour.

16 (Whereupon, the above-entitled matter
17 went off the record at 12:34 p.m. and resumed at
18 12:43 p.m.)

19 G.A. Smith: Okay. Welcome back to
20 today's NACIQI meeting. I'll turn it over to our
21 Vice Chair, Claude Pressnell.

22 Vice Chair Pressnell: Thank you,

1 George.

2 Before we do the review of the
3 Occupational Therapy Association, I wanted to
4 call on Herman Bounds to make some clarifications
5 to his earlier comments.

6 Herman?

7 H. Bounds: Hi. Thanks. Yeah, I just
8 wanted to clarify some issues when I discussed
9 the focus review, the suspension of the focus
10 review, and Agency's compliance because there's
11 been some misinterpretation.

12 I was not saying that accrediting
13 agencies have not been in compliance with all the
14 regulations because of the focus review. The
15 fact that they have -- accrediting agencies had
16 to demonstrate compliance with all regulations
17 prior to the focus review being initiated. So
18 I wanted to clear that up.

19 The other issue is that the new
20 regulations did cause accrediting agencies to
21 have to comply with new regulations which
22 required them to provide additional information

1 and documentation. The providing of that
2 additional information and documentation is what
3 has been challenging as part of this review, as
4 noted by me, but they were able to do so.

5 So, again, I just wanted to make those
6 clarifying points. I was not saying that
7 agencies were ignoring any of our regulations
8 during that focus review period. So I hope that
9 clears things up for everybody.

10 Thank you, Claude.

11 Vice Chair Pressnell: You bet.

12 So, right now, we're going to look at
13 the renewal recognition of the American
14 Occupational Therapy Association, Accreditation
15 Council for Occupational Therapy Education. And
16 primary readers are Jill Derby and Robert Mayes.

17 Robert, you want to introduce the
18 Agency?

19 R. Mayes: Yes, sir.

20 The Accreditation Council for
21 Occupational Therapy Education of the American
22 Occupational Therapy Association is a

1 programmatic accrediting agency. ACOTE's
2 membership is voluntary, and its principal
3 purpose is to accredit higher education programs.
4 ACOTE currently accredits almost 400 programs and
5 institutions located in the United States, the
6 District of Columbia, Puerto Rico, and Guam.

7 ACOTE was last reviewed for
8 recognition at the summer 2017 NACIQI meeting,
9 and both the Department staff and NACIQI
10 recommended renewal of the Agency's recognition
11 for five years. And we're here today for a
12 petition for continued recognition.

13 Vice Chair Pressnell: All right.

14 Thank you.

15 Elizabeth Daggett's not able to be
16 with us here today, so Herman Bounds, you want to
17 provide a review, please?

18 H. Bounds: Yes. Thanks, Claude.

19 So good morning, Mr. Chair and
20 Committee members -- Mr. Vice Chair and Committee
21 members. Again, my name is Herman Bounds, and I
22 am providing for Elizabeth Daggett a brief

1 summary of the review of the petition for renewal
2 of recognition and request one expansion of scope
3 for the Agency, the American Occupational Therapy
4 Association, Accreditation Council for
5 Occupational Therapy Education.

6 The staff recommendation to the Senior
7 Department Official for this Agency is to renew
8 the Agency's recognition as a nationally
9 recognized accrediting Agency at this time,
10 subject to the submission of a compliance report
11 due in 12 months and a review and a decision on
12 the compliance report, and to approve the
13 requested expansion of scope. This
14 recommendation is based on our review of the
15 Agency's petition and supporting documentation,
16 as well as the virtual observation of a site
17 visit in September of 2021, an ACOTE meeting in
18 December 2021, and a final review in June of
19 2021.

20 Our review of the Agency's petition
21 found that the Agency is in compliance with the
22 Secretary's criteria for recognition except for

1 one outstanding issue. The Agency needs to
2 address its evaluation of whether a program
3 maintains requirements that at least conform to
4 commonly accepted academic standards or the
5 equivalent. We believe that the Agency can
6 resolve the concerns that we have identified and
7 demonstrate its compliance in a written report
8 within a year's time.

9 Within the petition, the Agency has
10 requested an expansion of scope to include an
11 occupational therapy assistant program at the
12 baccalaureate level -- degree level, excuse me --
13 and pre-accreditation at all program levels. The
14 Agency has demonstrated that it has accreditation
15 and pre-accreditation standards and policies in
16 place that meet the Secretary's criteria for
17 recognition for the requested scope of
18 recognition.

19 The Department received two complaints
20 regarding this Agency during the recognition
21 period and received one third-party comment
22 during its review. The review of the complaint

1 and the third-party comment were incorporated
2 into the review of the petition for recognition.

3 Therefore, as I stated earlier, the
4 Department staff is recommending to the Senior
5 Department Official to approve the requested
6 expansion of scope and to renew the Agency's
7 recognition as a nationally recognized
8 accrediting agency at this time, subject to the
9 submission and the review of a compliance report
10 due in 12 months and a review and decision on the
11 compliance report.

12 In the event that the recognition is
13 continued following a decision on the compliance
14 report, the period of recognition will not exceed
15 five years from the date of the decision on the
16 renewal of recognition that is issued by the
17 Senior Department Official.

18 There are representatives from the
19 Agency that are here today to answer your
20 questions. Thank you.

21 Vice Chair Pressnell: All right.

22 Thank you, Herman.

1 Jill, Robert, do you have any
2 clarifying questions for Herman, or are you okay
3 to hear from the Agency?

4 J. Derby: Yes.

5 Vice Chair Pressnell: Okay.

6 R. Mayes: Excellent. Good to move
7 on.

8 Vice Chair Pressnell: Okay. Great.
9 So, yeah, we are --

10 B. Shireman: Claude, can I ask -- can
11 I ask Herman a question?

12 Vice Chair Pressnell: Yeah. Sure,
13 Bob.

14 B. Shireman: Great. Thanks.

15 Herman, I'm noticing that there's some
16 inconsistent formatting or approach to the staff
17 recommendation. So, for example, this Agency --
18 and I want to know whether it has any meaning
19 that it's different. So, in this Agency, it's
20 just generally in the staff recommendation to --
21 compliance report. And then the -- presumably
22 the Senior -- your staff, if this was accepted by

1 the SDO, would go and look at the Issues and
2 Problems section and see that it was 602.17(a)
3 and look just at that.

4 But in one of the other Agencies, when
5 it's a compliance report, the recommendation
6 itself has the criteria, the actual regulation,
7 in the recommendation. And then, for the
8 monitoring reports, in at least a couple of the
9 Agencies, the specific section and the specific
10 question being asked is part of the staff
11 recommendation in addition to being listed in the
12 Issues and Problems section.

13 Is it just inconsistent, or does that
14 have any meaning when it's in one place versus
15 another?

16 H. Bounds: Yeah. So I think the --
17 normally, in the staff recommendation, you should
18 just get the basic compliance report language
19 that we have, and then you would see the issue in
20 the Issues and Concerns section. I think where
21 there may be a slight difference is when an
22 Agency has a compliance report and a monitoring

1 report included, and in those cases, I think we
2 include it. We may have included some additional
3 language about the monitoring report and the
4 compliance issue in the staff recommendation.

5 But, I mean, it's either here or
6 there. I think the main thing is the compliance
7 report language where we're saying to renew the
8 Agency's recognition at this time, and we talk
9 about the five-year recognition period not being
10 exceeded. So I think, all in all, you may see
11 some changes like that, but it doesn't really
12 change the recommendation as such.

13 I hope that answers your question,
14 Bob.

15 B. Shireman: Yeah. Thanks.

16 H. Bounds: Okay.

17 Vice Chair Pressnell: All right. Any
18 other questions for the staff in terms of
19 clarification questions? That was a good
20 question.

21 All right. Let's go to the Agency
22 representatives. We have Dr. Teresa Brininger,

1 who's the Director of the Agency, and Dr. Lynn
2 Kilburg, who is the Chairperson.

3 So, Teresa?

4 T. Brininger: Good afternoon. I'm
5 going to open it up for Lynn Kilburg to give the
6 opening remarks.

7 L. Kilburg: Thank you, and good
8 afternoon, Mr. Chair and members of the
9 Committee. We'd like to thank you for this
10 opportunity to speak on behalf of the
11 Accreditation Council of Occupational Therapy,
12 otherwise known as ACOTE.

13 My name is Dr. Lynn Kilburg, and I'm
14 the current Chair of ACOTE and serve as the
15 interim Dean of the College of Health and Human
16 Services and a professor in the Occupational
17 Therapy Department at St. Ambrose University in
18 Davenport, Iowa.

19 I'd like to take a moment to introduce
20 Dr. Teresa Brininger, who you just spoke with,
21 who serves as the Director of Accreditation. And
22 we want to acknowledge and express our

1 appreciation to Ms. Elizabeth Daggett for her
2 assistance in developing our petition. Her
3 knowledge of the regulations was clearly evident,
4 and her guidance proved invaluable during the
5 process.

6 Accreditation has been a stated
7 function of the American Occupational Therapy
8 Association, or AOTA, since 1923. ACOTE
9 currently accredits approximately 460
10 occupational therapy and occupational therapy
11 assistant programs, with 68 doctoral programs,
12 170 master's programs, one bachelor's program,
13 and 221 associate programs. Those are throughout
14 the United States, and there is an additional 212
15 occupational therapy and occupational therapy
16 programs that are in the applicant or candidacy
17 stage.

18 In 2021, approximately 30,750 students
19 were enrolled in our programs, 23,436 of those in
20 occupational therapy programs and 7,313 in
21 occupational therapy assistant programs. And
22 additionally, 13,874 graduated from an OT or an

1 OTA program in 2021.

2 We do want to take a moment to discuss
3 the complaint that was noted in the report.
4 During this review cycle, ACOTE received a
5 complaint regarding the amount of credit hours
6 required for master's degree programs. And the
7 Complainant carried the issue forward to the
8 USDE, linking it to Regulation 602.17(a)(3).

9 To ensure compliance with this USDE
10 regulation and that ACOTE evaluates whether a
11 program maintains requirements that at least
12 conform to commonly accepted standards or the
13 equivalent, ACOTE has implemented several
14 measures.

15 First, ACOTE adopted an interpretive
16 guide to their current standards regarding
17 program length. The current standard requires
18 that programs must document a system and
19 rationale for ensuring the length of study of the
20 program is appropriate to the expected learning
21 and competence of the graduate.

22 The Council, after reviewing degree-

1 level guidance provided by the National Center
2 for Education Statistics, practices of
3 institutional accrediting agencies, policies of
4 programmatic accrediting agencies, and known
5 differences between occupational therapy programs
6 based on institutional and program variation, led
7 ACOTE to develop an interpretive guide related to
8 length of programs, and that has been added to
9 our standards.

10 ACOTE then held several education
11 sessions to ensure that the OT and OT assistant
12 educational programs were aware of the newly
13 adopted interpretive guide and had an opportunity
14 to ask questions and receive guidance. ACOTE
15 held four webinars and educational programs and
16 gave presentations at the AOTA annual conference
17 regarding the program lengths.

18 Questions regarding program lengths
19 were added to the annual report, as well, so that
20 they could monitor that. And we continue to
21 document compliance with the standard by adding
22 relevant questions to the annual report.

1 Additionally, training for evaluators was
2 undertaken. To ensure that the reviewers were
3 evaluating the standard consistently and
4 accurately, the roster of accreditation
5 evaluators and ACOTE Council members were
6 provided with training regarding this issue in
7 our quarterly update and at ACOTE meetings so
8 that we could address the standard sufficiently.

9 These efforts I just mentioned were
10 geared towards preparing programs and evaluators
11 to review reports that will be submitted on and
12 after August 1st of this year, 2022. As an
13 ongoing measure, ACOTE also charged our Education
14 Standards Review Committee, or the ESRC, which is
15 currently looking at our regular review of
16 standards, to conduct a deliberate and extensive
17 review of all ACOTE standards and all degree
18 levels and to determine the standards that are
19 appropriate for entry-level programs.

20 This review will inform changes and
21 modifications to the current standards. And as a
22 part of that standard review process, input from

1 communities of interest are solicited to include
2 all bodies within the AOTA organizational
3 structure, related organizations or bodies,
4 occupational therapy and occupational therapy
5 education program representatives, practitioners,
6 consumers, employers, regulators, recognition
7 bodies, accreditors, students, and the public at-
8 large.

9 The timeline for completion of this
10 review is 2023 with the release of new standards
11 in 2025. However, until their work is completed
12 and the standards are modified, ACOTE as needed
13 will educate or issue interpretive guidance to
14 ensure that the programs are meeting the
15 standards, including those related to program
16 length.

17 This concludes our opening remarks.
18 And once again, on behalf of the Accreditation
19 Council and staff, we would like to thank the
20 Department and the Committee for the opportunity
21 to present additional information in support of
22 our petition for recognition. We're happy to

1 answer any questions that you may have.

2 Vice Chair Pressnell: Okay. Great.

3 Thank you very much.

4 So let me open it up back to Jill and
5 Robert for questions of the Agency.

6 R. Mayes: Thank you, Claude.

7 So the heart of this matter seems to
8 be that it was deemed your programs are longer
9 than comparable programs accredited by other
10 agencies. Some other agencies publish a minimum
11 program length. Do you think that would be
12 something you'd do as part of your revisions?

13 L. Kilburg: So our approach was to
14 look at what some other agencies were doing, and
15 you're right. They do publish a minimum program
16 length. And so, with our updated interpretive
17 guide, we've provided a similar approach, not in
18 relation to credit hours, because that was a
19 challenging proposition as different institutions
20 allocate their credit hours differently over
21 semesters or perhaps quarters or so forth.

22 But looking at the NCES standards,

1 they looked at it according to full-time
2 equivalent year. So that's what we've provided
3 for the programs by degree level, where the
4 associate's degrees, bachelor's degree, and
5 master's, and then doctoral degree, can see what
6 that time frame --that length of program and time
7 -- should look like as a way to assess.

8 R. Mayes: Okay. And in follow-up to
9 that, the staff is recommending a one-year
10 compliance report, so that gives you time to
11 fully implement and demonstrate, document all --
12 you just talked about your changes. Well, do you
13 feel you'll be able to do that and demonstrate
14 that in one year?

15 L. Kilburg: We do. We have -- well,
16 first, every program conducts an annual report.
17 So we'll be able to have eyes on each program
18 with the submission of their annual report and
19 take a look at programs that might be outliers or
20 outside of the guidance in the interpretive
21 guide.

22 And then, additionally, some programs

1 might be submitting reports that would allow us
2 to see their program at a deeper dive. So we'll
3 have a chance to see every program and be able to
4 respond or provide them feedback as to their
5 level of compliance with this new standard. So
6 we anticipate that over the course of the next 12
7 months, we'll see eyes on each program.

8 R. Mayes: Okay. Well, that's all for
9 me. Thank you for your great work, by the way.
10 You're in an incredibly important industry, and
11 we appreciate what all you do.

12 Vice Chair Pressnell: Great. Thanks,
13 Robert.

14 Jill, do you have any questions before
15 we move to the full Committee?

16 J. Derby: Just a quick one. I agree
17 it's an excellent report, and this Agency is
18 doing a great job. Do you feel that your
19 development of this interpretive guide answers
20 the student's complaint that was issued that
21 really brought the whole concern forward? And if
22 so, how does it answer it?

1 L. Kilburg: Right. The student's
2 complaint -- while they identified credit hours
3 and length of program as being a specific
4 concern, we did look at that precedent-setting
5 information from NCES and the institutional
6 accreditors to locate guidance and, because of
7 our programmatic variation, opted to use length
8 of program instead of credit hours.

9 However, having said that, we also
10 have guided programs to take a critical analysis
11 perspective where they need to look at how many
12 credit hours are they putting into a year? How
13 does that relate to the definition of full-time
14 students? And are the students, as an example,
15 attending simply through the more traditional
16 academic year of August through May, or is the
17 program running 12 months out of the year?

18 So the program is really going to have
19 to evaluate -- they may be within the length of
20 time, but as an example, if they have that year
21 packed with credit hours well beyond what the
22 standard would be for a full-time student, that's

1 going to raise questions.

2 So we're looking to a program to be
3 able to tell us why there might be any exception.
4 As an example, we have some programs that are
5 within maybe a religious institution, and perhaps
6 their master's of science requires ethics courses
7 because the institution requires that. That
8 might allow for a variation.

9 But in general, the program is going
10 to have to really carefully analyze any
11 exceptions that go beyond the year or that would
12 go beyond that standard of a full-time credit
13 load for a student. I hope that answered your
14 question.

15 J. Derby: I appreciate that more
16 comprehensive answer. Thank you.

17 Vice Chair Pressnell: All right.
18 Wally?

19 W. Boston: Let me unmute it. Just
20 looking at the Department's review of the Agency
21 and the standards proposed for the doctoral
22 programs, it appears that what you've stated is

1 that you will come out with final standards for
2 those programs in 2023, and they will be
3 effective in 2025. Is that correct?

4 L. Kilburg: So that reflects our
5 typical length of process for review of our
6 standards on a regular basis. And I'd invite Dr.
7 Brininger to step in here as well. So that ESRC
8 process is the one that follows our policy and
9 procedure for regular review, opening up the
10 potential draft of new standards to our bodies
11 and constituencies for comments.

12 And then, as a result, once Council
13 would vote the next set of standards into effect,
14 then a program has a length of time to come into
15 compliance with it. I'll pause there.

16 Dr. Brininger, anything to add?

17 T. Brininger: I would just add, were
18 you asking if we have doctoral-level standards or
19 -- I think I didn't understand your question.

20 W. Boston: I'm going to have multiple
21 questions here. So the first one is, as I read
22 the section which appears to be justifying the

1 follow-up, you've written about the fact that you
2 don't have specific hours proposed and that
3 you've got an interpretive guidance, law, blah,
4 blah, blah.

5 And then you note that you are going
6 to put in place doctoral program recommendations
7 that I believe are -- the final regulations for
8 the doctoral will be available in 2023, but they
9 won't be effective until 2025. Did I read that
10 correctly?

11 L. Kilburg: We have doctoral
12 standards in place. The ESRC committee was
13 charged to take a hard look at the differences
14 between the degree levels. But we do have
15 doctoral standards in place.

16 W. Boston: Okay. So this line that
17 says the timeline for completion of the standards
18 review process is 2023 with implementation in
19 2025 -- that's actually to review your standards
20 ranging, I guess, from associate's standards to
21 bachelor's to master's to doctoral? Is that what
22 that's for?

1 L. Kilburg: That's correct. That's
2 our normal standard review process. So that was
3 just one of the other ways that we're addressing
4 the student complaint. So the interpretive guide
5 was voted on, and then it's in effect. And then,
6 when the Standards Committee Review committee
7 meet, they look at the interpretive guide, and
8 that should be incorporated into the standard.
9 And that will go into effect in 2025.

10 But they are -- it is an interpretive
11 guide, and programs are required to abide by that
12 requirement.

13 W. Boston: So, now, my next question
14 related to this is we've seen over the past 40
15 years, probably, migrations of programs that used
16 to require bachelor's degrees to master's -- and
17 I'm specifically commenting about healthcare
18 programs -- from bachelor's to master's to
19 doctoral, and I can think of pharmacy is probably
20 one of the first to go that route, and then
21 physical therapy.

22 Am I to presume that occupational

1 therapy is heading to go the same route, which
2 eventually will include licensure ranging from
3 requiring a master's to a doctoral program?

4 L. Kilburg: So our profession sets
5 the minimum entry level to the different
6 practitioner levels. In occupational therapy, we
7 have two levels of practitioner: the therapist
8 and the therapy assistant. And currently, the
9 minimum entry level for a therapist is master's.
10 Minimum entry level for an assistant is
11 associate's.

12 But within our education standards,
13 which is what ACOTE sets, there are two degree
14 levels. There has grown over time programs at
15 different degree levels in response to healthcare
16 demand, needing to have content area focus, the
17 ability to engage in conversations setting policy
18 and so forth.

19 So institutions of higher ed were
20 taking a look at how to provide that education
21 within different degree levels. So Teresa could
22 probably offer the year, but I believe that our

1 standards back in 2006 first set some standards
2 for doctoral level because we had programs at
3 that level as opposed to having one set of
4 educational standards for the practitioner.

5 So, while you do see those trends in
6 different professions, at this time, we don't
7 have a requirement for programs to be at the
8 doctoral level. That minimum entry is the
9 master's, or minimum entry is associate's. But
10 it is important to ACOTE for us to take a look
11 at, within those degree levels -- that each
12 obviously would address minimum criteria for
13 entry to practice, and if there are any areas or
14 points of distinction that are noted because of
15 the degree level, that advancing that student
16 beyond entry -- those should be at the
17 appropriate degree level.

18 So that, I guess, I'm hoping will help
19 you look back to what our charge was to the ESRC
20 was to really take a look at the content
21 standards and ensure that the appropriate content
22 was being required at the different degree levels

1 versus common content across all degree levels if
2 that wasn't appropriate.

3 W. Boston: Okay. I think I
4 understand that. So what you're saying is that
5 currently, there is no requirement to shift to a
6 doctoral program for official recognition as a
7 practicing therapist for occupational therapy. I
8 guess I want to just express my concern that it
9 appears that on behalf of students, we've had
10 this inflation, which -- adding to a bachelor's,
11 adds to a master's cost, and then adding to the
12 doctoral cost is time and money to completion and
13 probably ultimately impacts our ever-increasing
14 healthcare costs as well as higher ed cost.

15 So I'm glad to hear that you haven't
16 formulated the standard, but I'd love to hear
17 that maybe that's not your intention to get there
18 unless licensing authorities and states require
19 it.

20 Vice Chair Pressnell: All right.
21 Wally, is that it?

22 W. Boston: Yes.

1 Vice Chair Pressnell: All right.

2 Jennifer?

3 J. Blum: I'm so glad to be following
4 Wally because I have the similar line of
5 questions, and I've spent many years
6 contemplating graduate-level degree programs with
7 regard to program length, particularly at the
8 doctoral level.

9 And so, while this isn't -- just to
10 preface, this line of questioning is not
11 necessarily specific to your Agency. I do think
12 it's really important as it relates to compliance
13 with the standards. And so my concern comes from
14 the focus that the Department highlighted of, I
15 think, 602.17, the subsection -- as a specialized
16 accreditor, it seems like you're not required to
17 comply with the -- there actually is a criteria
18 in 602.16 on program length, which it sounds
19 like, just based on my review, you weren't
20 required to have to meet.

21 My question -- that's more of a policy
22 conversation. I'm raising it here as a group

1 because I think it's a good policy conversation
2 for later. And likewise, you're also not
3 required to meet separate and independent. And
4 so, when we talk about sort of professional --
5 where directionally, Wally, you were raising sort
6 of where things were going directionally as a
7 profession, and then your role as an accreditor.

8 I will say personally it's not on you
9 all, but I take some great pause and concern over
10 the interconnections there. But my question is,
11 is -- so your focus is on complying with 602.17,
12 and I understand that. But to me, there are
13 other criteria that should be looped into the
14 conversation as well, which is what the student
15 knows.

16 And I have seen this over the years
17 in my own world over and over again as to what
18 the student knows or doesn't know going into a
19 doctoral program, or even a master's program to
20 some degree, about program length and what the
21 schools are saying about what the length should
22 or shouldn't be expected -- recognizing that it

1 could be different per student.

2 And I'm a little concerned about the
3 fact that you were -- and maybe this is also just
4 a question for the staff, the Department staff.
5 But to me, it's beyond compliance with 602.17.
6 It also is, what does the world know about what
7 your expectations are of your institution about
8 how long a doctoral program is going to last?

9 And so I just want to give you the
10 opportunity to comment on that in terms of the
11 admissions piece of it, perhaps, the admission
12 standards, and what your expectations are in
13 terms of your school's disclosure to students
14 about what their expectation is for time to
15 completion.

16 L. Kilburg: I'll be happy to start
17 this and welcome, of course, Dr. Brininger to
18 step in as well, or please redirect me if I'm not
19 getting at the content that you're wondering
20 about as well. We have a number of approaches
21 that programs take.

22 First, by standards, they have to

1 provide accurate information related to their
2 plan of study and program of study and admissions
3 requirement on the website in an all-published
4 material. So that's a part of our standards and
5 what we assess every program on.

6 Now, having said that, different
7 programs within different institutions do take
8 varied approaches on when they may have a student
9 enter the program, the actual professional
10 portion of the program. So sometimes there are
11 prerequisite courses, obviously, for the graduate
12 degree programs. Some programs allow concurrent
13 courses with their baccalaureate classes that
14 might work towards their baccalaureate degree and
15 their graduate degree.

16 So, when we added our interpretive
17 guide on program length, we acknowledged that and
18 took that into account so that a program could
19 really analyze what is their student's path from
20 start of their pre-professional courses through
21 to the professional program, and assess their
22 program length based on that, keeping that in

1 mind that a master's program may take one to two
2 years after a baccalaureate degree is earned,
3 whereas a doctorate degree is typically going to
4 be more than two years after a baccalaureate
5 degree is earned.

6 But there is a variability in how our
7 programs do plan that pathway. So that's
8 depending on their institutional requirements,
9 certainly, or institutional accreditor
10 requirements. And so we see that happening.

11 Historically, I would add that as a
12 reviewer myself and looking at the nature of why
13 programs might plan for and select a particular
14 degree, they typically -- as they considered if
15 they want to, for instance, transition from a
16 master's to a doctoral degree or associate's to
17 baccalaureate, they're looking at the demands of
18 their program and trying to ensure they're
19 offering the students the degree that they've
20 earned through their time and effort and money to
21 make sure that they haven't offered something at
22 a lower level than perhaps the student has put in

1 the time towards the doctoral level, as an
2 example.

3 So I acknowledge what you're bringing
4 up as the concern, and I think Council has
5 grappled with this, as well, as to programs and
6 trying to determine that they're really offering
7 a program of study and educating the student as
8 they start with their admissions process to think
9 about what program is right for them and how to
10 be efficient, yes, and also meet the outcome
11 requirements to pass the certification exam.

12 Teresa, anything to add?

13 T. Brininger: I would just add that
14 those standards regarding admission criteria are
15 looked at on the annual report, the interim
16 report, and self-study. So these are looked at
17 quite frequently.

18 J. Blum: And that would include a
19 review of what the schools are saying to their
20 students before they enroll about what they
21 expect the time for completion might be before each
22 of those? Because, Dr. Kilburg, you were

1 mentioning sort of as the student was -- the way
2 you were talking, it was almost as if the student
3 was already enrolled and making sure that they
4 have the right degree on -- sort of focused on,
5 before they start, making sure that they
6 understand what's involved in terms of length of
7 time because there's so much -- I mean, to be
8 honest with you, there's just so much money at
9 stake at the grad level.

10 And so I could have a whole other
11 conversation about that. And so this connective
12 tissue of -- and holistic approach on the part of
13 the accreditor to not just make sure that the
14 institution has an appropriate standard in place,
15 are expected -- recognizing that it's a bit
16 qualitative as to length of time. It should not
17 be hard and fast.

18 But what the student is being told at
19 the time of admission, I think, is -- and I don't
20 think the Department staff sort of went there on
21 the report, and I'm not necessarily suggesting
22 that we go there. But I do think it's incumbent

1 on the accreditor to tie those two things
2 together.

3 I do, as just a final point -- Wally's
4 point about time -- his line of inquiry about the
5 time frame by which you're proceeding with your
6 new regs -- I mean new standards, sorry -- is a
7 bit inconsistent with the one you're -- so we're
8 going to have this one-year compliance report,
9 but -- and I don't know -- Wally, you didn't say
10 this, but maybe I'm saying this. I'm a little
11 confused about -- okay. So, in one year, we're
12 going to have a bit of a picture, but it doesn't
13 feel like we're going to have an actual
14 resolution on compliance in one year, not because
15 you're not doing a great job, but simply just a
16 time frame technical issue.

17 And I'm not sure this is a question.
18 This is more of just a statement, maybe, for us
19 to talk about during the motions process.

20 L. Kilburg: And just a point of
21 clarification to that, then. Our interpretive
22 guide is in effect. And so programs have to

1 report on their compliance with that as of August
2 1st, 2022. We will see every program, as a
3 course of their annual report, respond to that
4 and have an opportunity, if necessary, to provide
5 feedback or give an area of noncompliance related
6 to that start-up program and the process of
7 revision and feedback.

8 The ESRC, or Education Standards
9 Committee, is a separate process and a part of
10 our regular five-year review cycle of standards.
11 So it will also formalize this interpretive guide
12 into that. But the interpretive guide is already
13 in effect, and programs need to comply with it by
14 August 1st. I hope that --

15 J. Blum: That's very helpful,
16 actually. Thank you for the clarification.

17 Vice Chair Pressnell: All right.
18 Bob?

19 B. Shireman: Thank you. And the
20 discussion of the last Agency there was -- when
21 we were talking about public members, I noted
22 that the public members, at that point, anyway,

1 were all academics. It looks like, from your
2 approach, that you actually have different
3 categories of public members.

4 Can you say a little bit more? I saw
5 consumer representative and higher education
6 community. Can you tell us a little more about
7 your approach to public members and that kind of
8 distribution of types?

9 T. Brininger: So we have three public
10 members currently serving on ACOTE. Two are
11 healthcare consumers, and one is representing
12 higher education. What we do is we need a public
13 member. We put out a call, and then we receive
14 applications, CVs. The Accreditation Department
15 ensures that it meets our definition of a public
16 member. And then we will forward those on to the
17 Executive Council for their review and interview
18 to serve on the ACOTE council.

19 B. Shireman: When you think about a
20 healthcare consumer, obviously just some random
21 person who consumes healthcare -- that would be
22 all of us -- I would imagine it might be a little

1 bit hard to figure out -- I mean, are there
2 organizations that you go to that kind of
3 represent consumers in healthcare, or how do you
4 gin up the applications for something like that?

5 T. Brininger: So we publicly post it
6 on the website, and we post it in our AOTA/OT
7 practice -- so the website as well, and then,
8 really, word of mouth. We don't seem to have
9 gotten a lot of interest in serving as a public
10 member on ACOTE.

11 B. Shireman: Great. Thank you very
12 much. That's all my questions.

13 Vice Chair Pressnell: Thank you, Bob.
14 Wally?

15 W. Boston: Yes. So I want to go back
16 to a reply that you gave me and that I think ties
17 in to this 2023 comparative review between degree
18 levels. So, currently, a master's in OT is a
19 two-year program post-baccalaureate graduation.
20 And even though you don't have specific
21 guidelines on that, I guess just cause and
22 decision related as well. Let's just say it's

1 approximately two years.

2 And then a doctoral program -- I'm
3 assuming it's three years post-baccalaureate. So
4 there's an interesting dichotomy, I think,
5 between whether someone believes they have to get
6 a doctoral program, which is an extra year or 50
7 percent longer for their studies and their
8 clinical practice versus the two.

9 And I'm just curious how you believe
10 your Committee or whatever it is will resolve
11 that since I find it very interesting to justify
12 that extra time. It's almost like the classic of
13 every lawyer I know says they didn't need their
14 third year of law school, and somehow it's
15 required. So can you comment? Thanks.

16 L. Kilburg: Yeah. Currently, our
17 master's and doctoral-level program, which both
18 allow people to enter as an occupational
19 therapist, have a set of what we refer to as B
20 standards. Those are really the content
21 standards for entry-level education, informed
22 significantly from the profession and evidenced

1 within the profession for what practice requires
2 as well as our certification exam, which draws
3 from current practice.

4 But our doctoral-level programs are
5 required to take those further. As an example,
6 in the set of standards in the doctoral level, it
7 speaks to the practitioner's ability to diagnose
8 occupational dysfunction, whereas that language
9 is a little bit less -- at a lower taxonomy level
10 in the master's program. Or our doctoral
11 students also are required to take an
12 individualized advanced look at content area of
13 their choice with a faculty content expert and a
14 supervisor, and they conduct a capstone project
15 and then a capstone experience as well.

16 So those are some of the additional
17 content requirements that are in a doctoral
18 program already. And I think when Dr. Brininger
19 and I talked about the ESRC and charging them
20 with looking specifically at content standards,
21 it was to ensure that we are really being
22 explicit about what's entry-level versus what a

1 program should say this is beyond entry level,
2 but it's a part of what we're seeing the demands
3 are within our profession based on the
4 profession's guidance and the demands in
5 healthcare and for our consumers, which we
6 believe will ultimately help inform the student
7 as a consumer within an education program going
8 forward as well.

9 Vice Chair Pressnell: All right. Any
10 other questions from the Committee?

11 All right. I'm not aware of any
12 third-party comments that were submitted outside
13 of the context that we just discussed. And,
14 Herman, I could stand corrected on that. So,
15 that being the case, Herman, do you have any
16 closing comments or --

17 H. Bounds: No, I don't have anything
18 else, Claude. Thank you.

19 Vice Chair Pressnell: Okay. Well,
20 I'll turn it back to our primary readers, Jill
21 Derby and Robert Mayes, for a motion.

22 R. Mayes: Yes, Claude. We'd like to

1 make a motion in line with the staff
2 recommendation, which would be to move that
3 NACIQI recommend the Senior -- hang on; I gotta
4 get back to the screen -- the Senior Department
5 Official grant ACOTE new recognition with the
6 required compliance report to be submitted to the
7 Department within 12 months from the decision of
8 the SDO.

9 Vice Chair Pressnell: All right.

10 Very good. Is there a second?

11 J. Derby: I'll second the motion.

12 Vice Chair Pressnell: Seconded by
13 Jill Derby. All right. Any discussion about the
14 recommendation for the motion?

15 Yeah, Jill? Or Jennifer, rather. I'm
16 sorry.

17 J. Blum: Yeah. I just want to -- and
18 this is more about motions in general. So this
19 is a compliance report that would only be
20 specific to 602.17 -- because we don't say it in
21 the motion, so I just want to be really clear
22 that the compliance report would only pertain to

1 the -- I'm not going to get it right -- the
2 602.17, subsection whatever.

3 W. Boston: A.

4 Vice Chair Pressnell: A. Yeah.
5 Subsection A.

6 J. Blum: So my question -- and
7 perhaps I'm throwing it out there -- is whether
8 it ought to go beyond -- I'm fine with the one-
9 year compliance report and all that. I'm fine
10 with the motion. It's just that, along the lines
11 of what I was saying before, I don't feel like
12 this is only just about do they have a program-
13 length requirement that's clear within the
14 dialogue between their institution and the
15 Agency.

16 To me, it's like, okay, so what do the
17 students know? And so I think that there is a
18 recruiting standard that they would need to be
19 compliant with in terms of -- but I don't want to
20 reach too far, and I'm not -- you know, but I'm
21 throwing that out there for conversation that to
22 me, this isn't just about do they have a standard

1 in place, and do the schools know what the
2 standard is in place or guidance is in place on
3 program length?

4 It actually also goes a step further.
5 And I don't think that's -- I'm not sure if
6 that's 602.17 or not. Does the Department review
7 how that standard gets implemented by the
8 institutions in the form of communicating to the
9 students? And again, I try not to stretch too
10 far, but at the same time, I just feel like I'm
11 not 100 percent comfortable.

12 Vice Chair Pressnell: Yeah.

13 Herman, do you have any comments on
14 that in terms of the correlation between those
15 two issues?

16 H. Bounds: I would just say that we
17 look to see how the Agency distributes its
18 standards, and the standards are going to then
19 reflect what the requirements would be for each
20 individual degree level. So, I mean, in our
21 mind, that's how that's communicated to the
22 institution.

1 The other thing is that you have ACOTE
2 and AOTA, so you have the association who sets
3 the requirements for entry-level into the field.
4 And that organization would be communicating and
5 students would be aware of the licensing purposes
6 of what's required to work. And then, again,
7 ACOTE itself sets the educational standards to
8 achieve whatever the entry-level -- into the
9 field as required. That's why we stress that
10 they don't have to meet separate independent
11 requirements.

12 So there are several ways that
13 communications are made to students, what is
14 expected of them. So that's why we have found
15 the Agency noncompliant with 602.17(a)(3), which
16 is basically the specific area that we thought
17 the Agency was deficient in.

18 J. Blum: Hang on.

19 Vice Chair Pressnell: Does that help
20 you, Jennifer?

21 J. Blum: Yeah. I mean, I'm a little
22 uncomfortable, but I'm fine.

1 Vice Chair Pressnell: And again, I
2 think that our practice today has been that if
3 you want to state your vote and then provide
4 context on the vote -- does that sound good?

5 J. Blum: Yeah.

6 B. Shireman: One clarification to be
7 aware of -- I'm sorry if I'm going out of order.

8 Vice Chair Pressnell: That's fine.
9 Wally will be up next. Go ahead, Bob.

10 B. Shireman: Okay. Yeah. One
11 clarification is that there is this one provision
12 in the regulations -- and, Herman, correct me if
13 I'm wrong about how this works. There is a
14 provision in the regulations that says that if
15 the Advisory Committee finds an Agency out of
16 compliance or possibly out of compliance with
17 something that the staff did not identify, that
18 the Agency has ten days where they can submit
19 additional information to the SDO, which is
20 otherwise not allowed. They're not allowed to
21 submit anything other than what's already in the
22 record and what's in our Q&A of them. So they

1 would have an opportunity to put some more
2 information to the SDO for the SDO to then
3 consider.

4 I don't think it's a big deal, but it
5 is the one instance when it might make more sense
6 to include something in the recommendation itself
7 from the Advisory Committee as opposed to the
8 statements of individual members.

9 Vice Chair Pressnell: Yeah. Thanks,
10 Bob.

11 Wally?

12 W. Boston: Claude, I think you
13 handled it by telling Jennifer that she can make
14 a comment, and I think that's where I'm going to
15 go. And I had my hand up because I was going to
16 encourage people if they had any comments or if
17 they agree with, I guess, Jennifer's or mine,
18 that I would appreciate it. So thanks.

19 Vice Chair Pressnell: All right. Any
20 other questions/comments about the motion?

21 All right. If not, let's go ahead and
22 take the vote.

1 J. Blum: Did somebody move, though,
2 first, Claude?

3 Vice Chair Pressnell: Yeah. It was
4 moved.

5 (Simultaneous speaking.)

6 Vice Chair Pressnell: So, Kathleen,
7 are you --

8 K.S. Eliot: Yes.

9 Vice Chair Pressnell: Roslyn?

10 R. ARTIS: Yes.

11 Vice Chair Pressnell: Jennifer?

12 J. Blum: Yes, with the comment that
13 I hope that the Agency will not just work on the
14 compliance of 602.17, but that both they and the
15 SDO will think about the correlation to the
16 recruiting standards and criteria as well.

17 Vice Chair Pressnell: Well stated.

18 Wally?

19 W. Boston: Yes, with the comment that
20 I still have some concerns that there is such a
21 big leap from a two-year master's program to a
22 three-year doctoral program. And I can't get the

1 granularity from this Agency because maybe, while
2 there are standards, it seems that we could be
3 forcing students to take on more debt and take on
4 another year. So I'd ask them to consider that
5 when they go through this evaluation of the
6 requirements for the degrees.

7 Vice Chair Pressnell: Thank you.

8 Jill?

9 J. Derby: Yes.

10 Vice Chair Pressnell: Dave?

11 D. Embanks: Yes.

12 Vice Chair Pressnell: Michael?

13 M. Lindsay: Yes.

14 Vice Chair Pressnell: Molly?

15 M. Hall-Martin: Yes.

16 Vice Chair Pressnell: Robert?

17 R. Mayes: Yes.

18 Vice Chair Pressnell: Mary Ellen?

19 M.E. Petrisko: Yes.

20 Vice Chair Pressnell: If you could
21 scroll down a little bit further. There we go.

22 Bob?

1 B. Shireman: Yes, and encourage the
2 SDO to take people's thoughtful comments into
3 consideration.

4 Vice Chair Pressnell: Zakiya?

5 Z. Smith Ellis: Yes, and align myself
6 with the comments of both Wally and Jill.

7 Vice Chair Pressnell: And Steven?

8 S. Van Ausdle: Yes.

9 Vice Chair Pressnell: All right. So
10 the motion passes. Congratulations to the
11 Agency, and congratulations to the Committee.
12 You guys nailed it from a timing standpoint. So
13 proved me wrong, which is fabulous.

14 So we will take a 30-minute break. So
15 I've got 35 minutes past the hour, so at five
16 minutes past the next hour, we'll come back.

17 (Whereupon, the above-entitled matter
18 went off the record at 1:35 p.m. and resumed at
19 2:10 p.m.)

20 CHAIR KEISER: Welcome back,
21 everybody. We have one more agency to review
22 before the end of the day. I hope you had a

1 good, but short, lunch.

2 We are now going to be looking for the
3 Renewal Recognition for the Association for
4 Clinical Pastoral Education, Inc., and their
5 Accreditation Commission ACPEI. The primary
6 readers are Jennifer Blum and Claude Pressnell.
7 And the floor is yours Claude and Jennifer.

8 J. BLUM: Great. I think I, Claude,
9 I'll go ahead with the introductions.

10 VICE CHAIR PRESSNELL: Okay. Sounds
11 great.

12 J. BLUM: The accrediting commission
13 is the accrediting body within the association
14 for clinical pastoral education. The accrediting
15 activities include pre-accreditation and
16 accreditation of CPE Level 1 and Level 2
17 programs. And certified educator programs.
18 That's CPE.

19 The ACPEI Commission have a voluntary
20 membership. And it's principal purpose is
21 accrediting higher education programs.
22 Accreditation does not enable the programs to

1 establish eligibility to participate in Title IV
2 HEA programs as such. ACPEI is not required to
3 meet the separate and independent requirements.

4 CHAIR KEISER: Anything to add,
5 Claude?

6 VICE CHAIR PRESSNELL: The
7 Departmental Staff, on this particular agency, is
8 Laco Corder. Mr. Corder, or Dr. Corder, welcome.

9 L. CORDER: Thank you. Good
10 afternoon, Chair, and Members of the Committee.
11 My name is L.G. Corder, and I am providing a
12 summary of the review of the petition for renewal
13 of recognition for the association for clinical
14 pastoral education incorporated.

15 The Agency is not a Title IV
16 gatekeeper. The staff recommendation to the
17 senior department official is to renew the
18 Agency's recognition as a nationally recognized
19 accrediting agency at this time.

20 Subject to the submission of a
21 compliance report due in 12 months, and a review
22 and decision on the compliance. In the event

1 that recognition is continued following a
2 decision on the compliance report, the period of
3 recognition will not exceed five years from the
4 date the decision on the renewal of accreditation
5 is issued by the senior department official.

6 The Agency is in substantial
7 compliance with Section 602.23(f) and (g).
8 Therefore Department Staff recommends the Senior
9 Department Official, or SDO, require a monitoring
10 report within 12 months of an SDO decision, if an
11 appeals panel is assembled. To be reviewed by
12 Department Staff demonstrating the Agency's
13 adherence to the revised appeal policy.

14 These recommendations are based on our
15 review of the Agency's petition, it's supporting
16 documentation and virtual observations of an
17 accrediting commission meeting, two site visits
18 and a file review. The Department did not
19 receive any third-party comments.

20 Staff recently received a complaint
21 inquiry in July 22 and had begun our process of
22 responding to the inquiry. The Agency was last

1 granted a renewal of recognition in 2017.

2 And 2019 the Agency provided a letter
3 to the Department requesting its scope, include
4 distance education. The Agency's current scope
5 of recognition states, the provisional
6 accreditation and accreditation of both clinical
7 pastoral education CPE centers and certified
8 educators CPE programs within the United States,
9 including those that offer those programs via
10 distance education.

11 The Agency would have been required to
12 meet all criteria associated with recognition for
13 distance education in this petition. However,
14 the Agency has since requested the Department
15 remove distance education from its scope of
16 recognition.

17 This change is reflected in a Staff
18 recommendation, along with additional
19 recommendations to clarify the individual program
20 names the Agency accredits, and to provide
21 conformity with the language in the regulations.
22 These recommendations are further explained in

1 the Staff report.

2 The revised scope of recognition would
3 state, the pre-accreditation and accreditation of
4 CPE Level 1, level 2 programs, and certified
5 educators CPE programs.

6 Review of the Agency's petition found
7 that the Agency is in compliance with most areas
8 of the secretaries criteria for recognition.

9 However, there are some outstanding issues and
10 significant areas that the area needs to address.
11 For example, the Agency is recognized to accredit
12 two programs in clinical pastoral education, CPE
13 Level 1, Level 2, and certified educators CPE.

14 For the CPE Level 1, Level 2 program,
15 the Agency has not sufficiently explained how its
16 student achievement requirements continues to be
17 a sufficiently rigorous standard for success with
18 respect to student achievement. Further, the
19 Agency has not identified any student achievement
20 standard for its certified educator CPE program.

21 Additionally, the Agency does not have
22 a defined program link for either of the programs

1 it accredits. Therefore, under the recently
2 revised regulation at Section 602.20(a), the
3 Agency has not been able to demonstrate that its
4 enforcement actions will take place within the
5 required timeline.

6 There are numerous other areas of the
7 criteria that Staff have found out of compliance
8 that must be addressed. These outstanding issues
9 are related to organizational and administrative
10 requirements, required standards and their
11 application and required operating policies and
12 procedures.

13 I would like to make one clarification
14 for the record on the Staff determination at
15 Section 620, excuse me, 602.23(f). To state that
16 the specific remaining area the Agency needs to
17 respond to is Subsection (f)(iv) regarding the
18 regulatory prohibition against moving an
19 accredited program from accredited to pre-
20 accredited status, unless following the loss of
21 accreditation, the program applies for initial
22 accreditation and is awarded pre-accreditation

1 status under the new application.

2 Between the draft Staff analysis and
3 the final analysis, the Agency was able to bring
4 a large number of areas into a finding of
5 compliance, thus demonstrating that it is
6 committed to making needed changes. Department
7 Staff believes that the Agency can address the
8 remaining outstanding issues and demonstrate
9 compliance within 12 months from the decision by
10 the senior department official.

11 Representatives of the association for
12 clinical pastoral education are here today and
13 can respond to your questions. Thank you.

14 CHAIR KEISER: Thank you, L.G. Any
15 questions for L.G.? Jennifer?

16 J. BLUM: Yes. Sorry, I forgot to put
17 my hand up. So, L.G., thanks for the way you
18 provided the summary because it's quite helpful.

19 But I still want to ask just a few
20 questions. There is a lot here for a small
21 agency. So, and I think this is an example of
22 where Claude had asked earlier this morning, you

1 know, across agencies in terms of the transition
2 under the new regs perhaps, trying to decipher
3 why, sort of refer to administrative
4 noncompliance versus substantive noncompliance.
5 Those are just my terms for my own use.

6 And with regards to the administer,
7 what I would define as administrative side. Am I
8 correct, I mean, there were a number, and you
9 sort of just alluded to this, there were a number
10 of areas where what the Department is saying is
11 not that the Agency is not complying but rather
12 you don't have the evidence, you didn't receive
13 the documentation that you need to make the
14 decision.

15 And let me give an example of just a
16 couple that I saw but I wanted to just confirm
17 that I'm reading this correctly. The training of
18 the appeals panel, conflicts of interests. Those
19 were two, those are two separate ones, but two
20 criteria that fall into the compliance report
21 list, if you will.

22 And my interpretation, from what I

1 read, was that you're not saying that there is an
2 ethics problem as it relates to conflicts, you're
3 saying actually though that you're not sure
4 because you didn't receive what is necessary to
5 make that determination. Is that a good example
6 of sort of an administrative problem?

7 L. CORDER: It is. There is going to
8 be really a wide array. So in particular, with
9 the conflict of interests issue, we're not saying
10 that they are actually in violation of what would
11 be the commonly accepted practice for avoiding a
12 conflict of interest over an issue involving
13 accrediting decision for any particular program.

14 But what we are accustomed to viewing
15 are conflict of interest policies and procedures
16 and forms that are tailored to avoiding conflicts
17 of interests with decision makers and the
18 programs over which they are making these
19 decisions. The Agency is using a form that's a
20 bit more odd in which it very particularly makes
21 sure there is no conflicts between the decision
22 makers and the Agency itself.

1 And so, that is one where, again, we
2 just, we're looking for better documentation that
3 is more in line with what we're accustomed to
4 seeing. Can you tell me again, ma'am, what was
5 the other one you mentioned?

6 J. BLUM: The other one was, I think
7 there was a finding that was relating to
8 training. Appeals panel.

9 L. CORDER: Yes. So again, a
10 difficult one for the Agency because they only
11 convened one appeals panel during the recognition
12 period.

13 J. BLUM: Yes.

14 L. CORDER: Despite that, we still
15 want to see documentation of what the training
16 for the appeals panel members should be. So yes,
17 if you're speaking about deficiencies we've
18 identified that are aligned with that, I think
19 your characterization was close. Again, there is
20 going to be a wide array, but yes.

21 J. BLUM: Okay. And just by the way,
22 for the record, just so, you know, because I feel

1 like I need to say it, I'm not minimizing, by the
2 way, concerns over administrative noncompliance
3 versus sort of what I call substantive
4 noncompliance. Especially at this level.
5 Because there is a lot.

6 But I also appreciate the Department's
7 perspective and respect the perspective that
8 you're, after a thorough review, you feel like
9 they can come into compliance. If you haven't
10 said that, to be honest with you I would have
11 even more questions probably.

12 I do have a technical question. A
13 criteria question. You mentioned, and I wish I
14 had caught this, I wasn't thinking about this
15 Agency on the last Agency, I wish I had been.

16 Because you mentioned that they don't
17 have a criteria for program length. And you
18 called that under a sort of compliance issue
19 under, I think 602.20(a). And with the other
20 Agency we're calling it out under 602.17.

21 And, I mean, I'm not sure it matters
22 but I do feel like, from a Department consistency

1 standpoint of, is there, and I'm not asking you
2 to opine about the other Agency, but I am a
3 little confused about why, you know, which
4 criteria, or maybe it's both, that the
5 noncompliance, we're not having a standard on
6 program lengths. So I just wanted to throw that
7 out there because that confused me.

8 L. CORDER: I can't speak to the
9 602.17 section --

10 J. BLUM: Yes.

11 L. CORDER: -- for the other Agency
12 without really digging into the specifics there.

13 J. BLUM: Yes.

14 L. CORDER: I can say obviously we've
15 gone through those particular criteria here as
16 well. The criteria that we found to have not
17 been in compliance is very particular about an
18 enforcement timeline in conjunction with a
19 minimum period of time based upon, I think it was
20 four years for the program length. And the
21 Agency does not have one.

22 So once the Agency, in its response to

1 draft staff analysis, is really committed to the
2 fact that there is not a dedicated timeline.
3 Based upon that recently revised regulation, I
4 did not find a way to possible say that they
5 could comply with that enforcement timeline.

6 And I think if you want to tease out
7 a scenario where that might not work, I believe
8 in the draft staff analysis, I've sort of
9 concocted an area where I had worked with the
10 Agency in correspondence to figure out, okay,
11 well, what is the average of your program working
12 out to.

13 And in conversations with the
14 executive director there, I sort of hashed out in
15 my mind, well, if it leans on this program length
16 average then possibly they're going to be within
17 150 percent. But if it goes out to this other
18 length of time then they might not be within 150
19 percent.

20 So finally I had to land on the
21 reality that there wasn't a dedicated timeline.
22 And I couldn't say for certain that they would be

1 within 150 percent. Is why it landed there and
2 is written that way.

3 J. BLUM: Yes. And I would say, I
4 mean, I would -- so I totally understand. And I
5 would add, and I definitely have questions for
6 the agency around its completion rate. But it
7 would seem to me that you don't have a program
8 length and then, I mean, there is sort of a
9 difference there, but it does seem a little bit
10 like a moving target if you don't have
11 established program lengths too.

12 So that's it for me on terms of the
13 Staff questions.

14 CHAIR KEISER: Okay, thank you,
15 Jennifer and L.G. I'd like to introduce Dr.
16 Trace Haythorn who --

17 J. BLUM: Art, Claude, I think Claude
18 and --

19 CHAIR KEISER: Yes.

20 (Simultaneously speaking.)

21 CHAIR KEISER: -- question for the
22 Staff or do you want to --

1 VICE CHAIR PRESSNELL: Yes.

2 CHAIR KEISER: -- Agency?

3 VICE CHAIR PRESSNELL: No, with the
4 Staff.

5 CHAIR KEISER: Okay, Claude.

6 VICE CHAIR PRESSNELL: Well, I think
7 that, and I know Herman has got his hand up too
8 so he might be able to address this, but this is
9 where the volume of findings was pretty
10 incredible.

11 And so I would agree with Jennifer
12 that you saying, stating that they can cover this
13 within 12 months gives us an indication as to the
14 level of difficulty with these. The thing that,
15 I mean, as you read through the outstanding
16 issues there is a lot of amend the policy, revise
17 the policy, those types of things that are going
18 on.

19 But they don't seem to be around
20 issues that are not new. You know. Like the
21 training issue. And there are a lot of things in
22 here about how you receive complaints and those

1 types of things.

2 So, this is where I was trying to get
3 a handle. And it is, Jennifer, to your point, my
4 earlier question at the very, very beginning, in
5 trying to get a landscape of how much of this is
6 just, you know, trying to get into compliance
7 with the new standards or how much of this is
8 kind of laying over from some previous reviews.

9 But, you know, so this is what's made
10 it difficult because when you're looking at
11 nearly 20 outstanding issues, some of which are
12 substantially compliant, and I understand the
13 difference between compliance and monitoring
14 reports, and I agree with that. But honestly,
15 this body is not used to seeing quite that many
16 without there being a serious decision about
17 continuation of recognition.

18 But here we're saying, all right,
19 we'll knock, they should be able to knock it out
20 in a year. So that was the challenge I was
21 trying to stress earlier as to, we're trying to
22 figure out how much of a magnitude do we put on

1 these issues in light of the transitioning from
2 the former standards to the new standards.

3 And Herman want to talk to that or
4 L.G. Either one of the two of you.

5 L. CORDER: I'll try just as somebody
6 who has probably had their hands on it a little
7 bit more over the course of the last 12 months
8 than the rest of the team. But from my
9 perspective, I think that you're seeing a mash up
10 of two things that really created sort of a storm
11 for the agency.

12 First and most obvious is the change
13 in the regulations and the movement away from
14 focus review. Which Herman discussed earlier in
15 the implications of that.

16 Additionally to that, the Agency
17 underwent a substantial revision to the manner in
18 which its policies and procedures are structured.
19 If I'm channeling my inner Marc Medwed voice
20 he'll say, it's off the wind there. But it's
21 just moved around in a lot of different places.

22 And so, when we say we think the

1 likelihood of success for the Agency to come back
2 in 12 months and perform to the standard, it's
3 based upon our reaction to the level of
4 responsiveness to the issues in the draft staff
5 analysis.

6 The response to the draft staff
7 analysis probably looks more like what we would
8 initially expect to see in the initial petition.
9 And so, now you're coming back to a phase where
10 we've got 60 days left in the timeline to really
11 go through and try to peel this apart.

12 The Agency was incredibly responsive
13 any places where I had correspondence about
14 trying to further understand where things moved,
15 how they've been applied, et cetera. That leads
16 me to believe that they are going to try to tidy
17 up the rest of what's wrong here.

18 The two areas I specifically called
19 out in the summary, with respect to the student
20 achievement issue for the two programs, and then
21 the program length, I specifically called those
22 out because those were the only ones that really

1 the Agency is probably going to have to make a
2 fundamental shift.

3 Especially with respect to the
4 certified educator program. They could come back
5 on the CPE Level 1, Level 2 and just simply
6 explain, hey Staff, this is how we arrived here,
7 this is our justification for this, this is what
8 we're going to stick with. That might work. The
9 other one, something needs to be crafted.

10 The timelines, you know, we called
11 that out because the nature of the program, the
12 way the Agency currently accredits those, that
13 could be a struggle for them. And so I think
14 we'll find out more in the Agency's commentary
15 today to support our thesis that they're going to
16 come back in 12 months, so we'll see. But that's
17 my perspective from the analysis standpoint.

18 CHAIR KEISER: Chime in, and then I
19 really want to go to the Agency. Go ahead.

20 H. BOUNDS: Yes. I just wanted to
21 respond to Jennifer's initial question about the
22 previous agency.

1 And this particular Agency, what we're
2 talking about the program length, if you remember
3 with ACO, they have a program length. The main
4 concern with them was it didn't comply with
5 timely accepted practice. And I think for the
6 master's degree program it was like an 86, you
7 know, 86 credit hours.

8 So there was no, the correlation with
9 602.20(a) was really not in effect because they
10 had a number to base the 150 percent or the four
11 years from. With this particular Agency, ACPEI,
12 since they don't have a student achievement
13 standard there is no base to establish what 150
14 percent would be or four years of the program.
15 So that was the main difference between those two
16 agencies.

17 The second thing is to our response
18 for Claude, is that, you know, that's what I was
19 trying to refer to earlier. I think that some
20 folks misinterpreted it.

21 Is that when we went from the focus
22 review we suspended that. Agencies now have to

1 write a response to all the criteria. Not saying
2 that they hadn't been in compliance, but it was a
3 new thing for them to do, was to have to think
4 about, write a response and then provide the
5 documentation needed for all of the additional
6 regulations.

7 So, I just wanted to make those two
8 points of clarification.

9 CHAIR KEISER: Bob, you want do the
10 Agency first and explain a little bit about
11 what's going on?

12 B. SHIREMAN: I think this will be
13 quick. I just want to understand the timeline
14 we're talking. You keep saying they'll be coming
15 back in a year and that they're coming to us in a
16 year.

17 Is that the way the timeline works or
18 did they respond to staff within a year and then
19 staff has a response, and then there is 180 days,
20 so then it's a year and a half, and then staff
21 finalizes it and it might come back to us in two
22 years. How does that work?

1 H. BOUNDS: Bob, you're close, but I
2 just want to remind you. So nothing happens
3 until the SDO makes a decision 90 days from now.

4 So based on that SDO decision letter,
5 that letter will then start the clock for the
6 compliance within 12 months and 30 days, I think
7 is what the regulation requires. Once we get
8 that compliance report in, at that point then of
9 course we will start our review.

10 The issue, again, that I explained
11 previously that adds the additional time, is
12 depending on what happens with the draft staff
13 analysis, we then have to give the Agency 180
14 days to respond to that draft. And then once we
15 get that response in, of course we have our
16 timelines to complete that review.

17 So that's what will add the additional
18 time. So you are correct, they will not be back
19 before NACIQI within one year from that, you
20 know, from that letter.

21 They have to provide the compliance
22 report to us within that one year's time frame,

1 then the timelines and review process will kick
2 in. So you're probably looking at maybe 18
3 months or so after the senior department
4 officials decision letter comes out.

5 B. SHIREMAN: So two years really in
6 terms of --

7 H. BOUNDS: Probably.

8 (Simultaneously speaking.)

9 H. BOUNDS: Probably.

10 B. SHIREMAN: Right. Okay.

11 H. BOUNDS: It could be sooner if
12 there are no deficiencies in the compliance
13 report, than the 180 days --

14 B. SHIREMAN: Right.

15 H. BOUNDS: -- issue is not a factor.

16 B. SHIREMAN: I mean, it seems like
17 for a lot of these, for some of the issues that
18 are in the, that's sort of like checking a
19 document, sort of saying could be done in two or
20 three months from now or from the SDO's letter,
21 in which case some things, for some of the
22 Agency's, could be dealt with quicker.

1 H. BOUNDS: Yes.

2 CHAIR KEISER: Thank you, Herman.
3 Thank you, Bob. Okay, we can go to the, we'd
4 like to hear a response from the members of the
5 Agency.

6 And, Dr. Trace Haythorn is the
7 executive director of ACPE. If you would like to
8 introduce your panel. And it's your time to
9 speak.

10 T. HAYTHORN: Thank you. It's a
11 pleasure to be with you all today. We too share
12 some of the, wow, that's a really long report.
13 And so are working very hard to get it into
14 compliance as quickly as we can.

15 I want to introduce Randy Hall, who is
16 currently the chair of our accreditation
17 commission. Katy Wilcox, who is the chair-elect.
18 And Marc Medwed, who is the associate executive
19 director and chairs the Staff functions for all
20 things related to accreditation for our Agency.

21 We have been a busy and active member
22 and have been recognized since 1969. So, a

1 number of entities from the Army, the Navy, VA
2 hospitals. A number of state agencies rely on
3 the work that we do, so we are eager and very
4 hopeful in being able to get our status back into
5 full compliance as we work with you.

6 Randy, let me pass it to you.

7 CHAIR KEISER: Randy, are you going to
8 present?

9 R. HALL: Apologies. My document went
10 away for a second there.

11 Good afternoon. I am Randy Hall. I
12 am the chair of the accreditation commission, as
13 you heard Trace say, for ACPE. I am also a
14 certified educator in ACPE, and currently serve
15 as the associate director of CPE at the
16 University of North Carolina in Chapel Hill,
17 North Carolina.

18 Since 1969 ACPE has been recognized by
19 the United States Department of Education as the
20 only accreditor or clinical pastoral education
21 programs. This longstanding history of
22 recognition from the Department has helped ACPE

1 to provide unmatched programs with high quality,
2 meaningful spiritual care education.

3 And ACPE accredits over 300 programs
4 across the United States with over 95 percent of
5 our programs located within the healthcare
6 setting. Never in our history have our programs
7 played a more important role than in the past few
8 years with the COVID-19 epidemic in the mental
9 health crisis that is affecting our nation.

10 As the largest program provider of CPE
11 programs, ACPE certified educators developed
12 educational programs of intense rigor, high
13 integrity and uses a clinical model of action
14 reflection that is essential for professional
15 development.

16 The CPE student gains the depth of
17 learning that enables the needed support for
18 patients, for families, and for front line staff
19 and medical personnel in times of emotional and
20 spiritual needs, primarily in crisis care, using
21 trauma-informed care education in working with
22 grief patients. Helping people deal with their

1 grief properly.

2 Through our developmental model of
3 clinical education, our students understand the
4 value of holistic care. How to meet and support
5 persons in their most vulnerable state and how to
6 be part of an interdisciplinary team to serve all
7 who they come in contact with.

8 COVID-19 pandemic ripped havoc on our
9 nation's healthcare systems. And our former and
10 current students played a large role in helping
11 to sustain patients with families and medical
12 staff.

13 All of our educators can share the
14 horrors and challenges that they and their
15 students face from being at the bedside if
16 someone died, so people do not have to die alone.
17 And to be a support to staff. Like when a
18 physician or nurse died by suicide while on
19 shift, succumbing to the pressures of the
20 pandemic.

21 In addition, the pandemic restrictions
22 required adaptations to continue to conduct site

1 visits and work on their accreditation commission
2 through personal sessions. The ACPE
3 accreditation commission works hard to maintain
4 the relational accountability that not only
5 allowed accredited centers to demonstrate
6 compliance through the standards, but also
7 provide a collegial and pastoral support during
8 this time.

9 ACPE accredited programs engage a
10 unique model of education. One that is granted
11 in objectives and outcomes and competency, but
12 that requires individual growth and accomplish at
13 different rates.

14 Our model of teaching, learning and
15 assessment resembles some traditional models of
16 learning. But through intense action,
17 reflections, knowledge, and new action, our
18 students grow into who they are.

19 Understanding themselves and how they
20 interact with others in order to provide
21 spiritual care and comfort as part of the
22 holistic model of care. But also supports the

1 interdisciplinary healthcare team in those
2 things.

3 But although ACPE adult learning model
4 is outside the traditional box, represented by
5 students from all walks of life, people who are
6 second and third career students who are often
7 engaged with professional and family obligations.
8 And in CPE a person's life narratives are
9 resources for their learning.

10 ACPE is determined to be in compliance
11 with the Department of Educations criteria for
12 recognition as an accreditor. Our programs are
13 stronger and better because of our relationship
14 with the Department and we look forward to
15 continued growth and development.

16 I and the Staff would like to thank
17 our analyst, L.G. Corder, for his time and
18 emergency and learning about our programs. His
19 assessments and reflections have been a wonderful
20 catalyst for discussion with our commission.

21 In reviewing the analysis of our
22 petition, we recognize that while we are doing

1 most of what is asked for in our practice, we
2 have not been strong in documenting these things
3 in writing. And we believe that these are usable
4 obtainable to implement and strengthen our
5 current work.

6 Since we are seeing the final report,
7 we have already implemented changes and have laid
8 out the process for further implementation in
9 increased documentation of the relational work
10 that we do. We look forward to further
11 developing these proceedings and to clarifying
12 expectations for documentation for our site
13 visits.

14 Our colleagues and I are grateful for
15 this opportunity to be in dialogue with the
16 National Advisory Committee. We appreciate your
17 time and we're glad that you're wanting to learn
18 more about CPE. And to answer any questions you
19 have that will maintain our ACPE accreditation.
20 Thank you. We welcome any questions you might
21 have for us.

22 CHAIR KEISER: Primary readers, do you

1 have questions?

2 J. BLUM: Yes. So, thank you so much
3 for your report out about ACPEI. And as I was
4 reviewing the materials, which was complicated, I
5 was very mindful of the important role that your
6 students and graduates have played in the last
7 couple of years. And in general.

8 So, I definitely, there is a measure
9 here of understanding what you all have also been
10 under in the last couple of years as well.

11 Having said that, I do have a number of
12 questions.

13 But before I ask the questions, I
14 wanted to ask, because you didn't quite do it in
15 your conversation. You are not a Title IV
16 gatekeeper. And so far as I could tell, but
17 please feel free to fill me in, and you called
18 them centers, but I actually appreciate the
19 Department's recommendation that you refer to the
20 programs as programs that you're accrediting.

21 Your programs are not often, it seems,
22 don't appear to be parts of institutions, the

1 prior eds, that aren't Title IV eligible either.
2 And so that's my first question. Am I correct
3 about that, that not only are you not the Title
4 IV gatekeeper, but the programs that you are
5 reviewing are also, a lot of them at least, are
6 not part of a eligible institution?

7 M. MEDWED: That's correct.

8 J. BLUM: Okay.

9 M. MEDWED: Many of our programs are
10 in hospitals.

11 J. BLUM: Okay.

12 M. MEDWED: A few are located in
13 universities, but the majority are in hospitals.

14 J. BLUM: Okay, thanks. So, I mean,
15 which I do think is a relevant piece of
16 information. But again, having said that, there
17 is a reason that you're before the Department of
18 Ed and that relates to, I assume, federal, well I
19 think it was stated somewhere, the federal
20 funding that you received from a number of other
21 agencies.

22 And so, can you just spend a second,

1 I think it's helpful for everybody to
2 contextualize because we are, I am, I think, are
3 going to have more questions about the criteria.
4 But I do think contextualizing why you're
5 interested in, or required to have recognition,
6 what motives that recognition?

7 T. HAYTHORN: Marc, do you want to
8 start that?

9 M. MEDWED: Sure. Recognition by the
10 Department is something that our folks value.
11 And we value the relationship with the higher
12 authority to have. Because it does help keep us
13 focused on honest about the way in which we do
14 our work.

15 We work very closely with the VA
16 system. The VA requires that all of its program
17 providers be recognized by the Department of
18 Education. So that's been a very big motivator
19 for us.

20 We also work with the Army and with
21 the Navy. And they also, while they don't
22 require it in the same way as the VA does, they

1 prefer it strongly. So it is part of their modus
2 operandi as well.

3 J. BLUM: Okay. That's helpful.

4 M. MEDWED: Trace, did you want to
5 jump in also?

6 T. HAYTHORN: Yes. I would just add
7 to that. The other piece is, because of the
8 longstanding role of chaplains within the
9 Military, one of the things that they are looking
10 for are folks that are paying to inclusivity and
11 multi-faith issues. Where they want to make sure
12 they're not bringing in people that are heading
13 out on a new crusade.

14 And so our work is really important in
15 making sure that folks are keeping appropriate
16 boundaries and working within a multi-faith
17 environment.

18 J. BLUM: Thank you. So, with that I
19 want to go into, my focus is really on the
20 student, as I think L.G. is used to, on the
21 student achievement piece and wanting to
22 understand, so my understanding from the review,

1 and from also what L.G. just said, you're
2 actually, I think, missing student achievement
3 standards for your certification program. But I
4 want to focus on the 75 percent, I think bench,
5 I'm going to use the term benchmark, you can
6 correct me if it's not a benchmark, but the 75
7 percent completion rate.

8 I guess my question is, can you go
9 over how you view that benchmark? Because to be
10 honest with you, I didn't really, I have a hard
11 time following its time frame. There was a
12 reference to the retention of three students.

13 I just, I really had a difficult time
14 understanding how that 75 percent completion rate
15 even works. So I think better than me asking you
16 a bunch of question, it's best for you to
17 explain, as it stands today, how that 75 percent
18 even works and what you might be doing to adjust
19 that.

20 M. MEDWED: Sure. So we look at that,
21 one of our requirements is that we have a minimum
22 group of three students to make up a group for a

1 unit of CPE. A unit of CPE consists of 400
2 hours. One hundred hours minimum of education,
3 300 hours of supervised clinical experience.

4 And the group number comes because of
5 the dynamics of having a group to be able to
6 process to do the work that they do because they
7 do a lot of work together as a group. Most of
8 our programs will have between four and five
9 students to start, sometimes a little bit more.

10 And it is a 400 hour requirement of
11 seat time for completion. So for those students
12 who complete the unit, they will get a credit.
13 Okay? And that's based on 400 hours.

14 During that time they worked on the
15 objective and outcomes. And because it's
16 developmental process, and individualized,
17 students will achieve those outcomes at different
18 rates and at different levels throughout their
19 time with us.

20 And the idea that 75 percent, is that
21 a program, if it's accepting students in the best
22 way possible through the interview process and

1 ensuring that those students have a reasonable
2 modicum of success, they will maintain the number
3 three. Because if they can't maintain a group of
4 three, the program can't function.

5 So it's being able to sustain that
6 through completing the orientation and finishing
7 the unit that demonstrates to us that the program
8 is actually achieving what it needs to achieve by
9 helping, by choosing students from the
10 recruitment process who can make it through and
11 continue to make progress in meeting the
12 objectives and outcomes that are set forth for
13 them.

14 J. BLUM: Okay. So my -- so that was
15 helpful. I would call that a retention, going
16 toward a retention rate rather than a completion
17 rate.

18 But I also would say that, just food
19 for thought, rather than having a set number of
20 three, because you're making an assumption about
21 the five, or maybe it's not an assumption, but if
22 your average five class of the programs that you

1 review is five, then you could come up with, so
2 is that the 75 percent is three, I mean, so I'm a
3 little, I'm still struggling with the correlation
4 between the three and the 75 percent. You see
5 what I'm saying?

6 M. MEDWED: Right. Many of our
7 programs will have four students. It just
8 happens to be that way. There is not a concrete
9 number that this program can accept. There is a
10 maximum number that a program can accept, but the
11 minimum would be three.

12 Many of our programs anecdotally over
13 the years we see, end up with four students in a
14 group. And if one were to leave, that leaves the
15 required minimum of three. So that's where the
16 75 percent comes.

17 And they can't always add more
18 students to it. Sometimes they're not qualified
19 students, sometimes they don't have more
20 students. But it creates the viability of the
21 program to be able to continue to move forward.

22 J. BLUM: And the 400 hours, and I

1 know I reviewed this but I'm saying it partially,
2 also for the benefit of everybody else, the 400
3 hours, at the end of that 400, that's the entire,
4 I'm calling it a program, so it's program?

5 M. MEDWED: So we don't --

6 J. BLUM: You called it a unit, so I'm
7 just --

8 M. MEDWED: We call it a unit.

9 Correct. We call it a unit of CPE. Some of our
10 students come from seminaries and they have an
11 obligation to take a one unit of CPE as part of
12 their organization process. Some folks are doing
13 this as a discernment and they would take one,
14 two or three units. There is no set number.

15 Some folks want to do a residency,
16 which is a paid position of a year long. But
17 it's not a required program per se.

18 You can come and go, you don't have to
19 join the entire thing. But it's a paid position.
20 And you're eligible for Medicare pastoral funding
21 if the center has a residency program. Which is
22 why that was created for that purpose.

1 Some folks want to go on to board
2 certification by one of our cognate partners.
3 That requires 1,600 hours. So four units of CPE.

4 So some folks will stay in CPE for one
5 unit, some might stay for 15 or 20 units. It's
6 really an individualized program in that sense.

7 J. BLUM: And the 75 percent is on a
8 per unit basis?

9 M. MEDWED: Per unit.

10 J. BLUM: Right?

11 M. MEDWED: Yes. Per unit. And then
12 over the course of the accreditation period as
13 well. For an aggregate number over the six year
14 period.

15 J. BLUM: Okay. Well, I think, I
16 mean, well, I support the -- I'm with the
17 Department on sort of the clarification around
18 that rate. And then also how, your evaluative
19 processes around that.

20 And I think combined, and I guess this
21 is the next part, that combined, my concerns
22 around that rate, combined with the no program,

1 you know, no established program lengths, I think
2 makes that 75 percent even a little bit of a
3 moving target for compliance purposes. In my, in
4 my mind, based on my review.

5 And I'll say this again, I said it
6 earlier today, not just as it relates to the
7 school, yes, not school, to the program that
8 you're reviewing, but also to those who are
9 enrolled in the program. And I recognize that
10 your situation is different than most.

11 You are pretty unique as an Agency.
12 And so I want to respect that uniqueness. And
13 yet, because we are working under the criteria, I
14 am always, I think, mindful of what somebody who
15 is enrolling in your units, what their
16 expectations are in addition to the programs
17 themselves expectation. And to me this all seems
18 a little bit of a moving goal.

19 So I'm glad that you'll be back in a
20 year. Or as Bob said, in 18 to 24 months. But I
21 did, I will, full disclosure, L.G. and I, the
22 fact that the compliance report comes back to

1 NACIQI is something that I find quite helpful
2 because I really respect the Department's view on
3 this that they feel like your, and it seems right
4 clear today, that you're fully invested and
5 committed to meeting the criteria.

6 I think to meet the criteria requires,
7 in my mind, that you come back to NACIQI so we
8 can also see that. So we look forward to seeing
9 you again.

10 CHAIR KEISER: Thank you, Jennifer.

11 Claude, do you have any --

12 VICE CHAIR PRESSNELL: Yes. Just a
13 couple --

14 CHAIR KEISER: And then Wally.

15 VICE CHAIR PRESSNELL: It seems as if
16 the length of program is based on units, and
17 those units are 400 hours. And obviously a
18 student could choose one unit up to maybe four
19 units or more, I don't know. So you might be
20 thinking about program length, along those lines.

21 But it really does depend on what the
22 student chooses. Is that correct, observation?

1 M. MEDWED: Yes, it correct.

2 VICE CHAIR PRESSNELL: Okay.

3 M. MEDWED: The student might only
4 have to take one unit, might want to take more,
5 might want to go for board certification, or
6 might want to do a second year residency that
7 some programs offer them to be able to get more
8 specialized.

9 The problem in the field, is that the
10 field requires different things. So there are
11 hospice centers in healthcare that don't require
12 CPE. Or may require one unit. Some hospitals
13 require board certifications, some don't.

14 So we're working with a variety of
15 factors. And this is theological education in
16 general that folks use for lots of variety of
17 things. Within the corporate world, within the
18 prison system. They go a lot of different places
19 after they leave us with different requirements.

20 VICE CHAIR PRESSNELL: Yes, I can see
21 that. You know, one hospital may require
22 something and then a whole another agency

1 requires something else. And the length of the
2 program is almost determined by the employer, if
3 you will, rather than by the institution. And
4 that does make it complicated.

5 My question, I want to -- in
6 Jennifer's argument in there so I'm going to, I
7 kind of get into the weeds here of the findings.
8 And so you've got, 602.25 deals with monitoring
9 report, or requiring monitoring report. Mostly
10 done in the fields panel.

11 And I understand that, that can only
12 be evaluated if you have to assume an appeals
13 panel. Although there is some policy issues
14 around that that you can satisfy in the meantime.

15 So you got that. But then you have a
16 lot of other compliance issues. So you have
17 monitoring issues whereas everybody around the
18 appeals process. But then you have a whole list
19 of issues that really demand some immediate
20 activity and some immediate response.

21 So the Department has great faith that
22 you can get this done in a year. I want to be

1 able to, if you could, articulate to us that same
2 confidence. And for instance, I don't know, I
3 mean, there is a long list of them here. Are
4 there some of you're actually already in
5 compliance?

6 You already have assembled the
7 documentation it's just a matter of sending it?
8 Kind of where are you in responding to the
9 report?

10 M. MEDWED: Great. So we started
11 working on those things. The conflict of
12 interest piece, one of the things that I would
13 say is that we do it, we've done a lot of these
14 things orally and relational. So we would make
15 sure that folks have no conflict of interest
16 before they were seated on a panel.

17 We're developing the documents and
18 consulting with our attorneys to make sure the
19 wording is correct so that we will have that.
20 And we can have documentation signed by each
21 member of the site team. And by each member of
22 the commission.

1 And that's three quarters of the way
2 done. So that's something that I think we can
3 easily do.

4 Training for an appeals panel, we do
5 training. We have one appeals panel, I did
6 training. I didn't have documentation of it to
7 be able to share, but we obviously, well maybe
8 not obviously, but we sat down, we went through
9 everything, we talked about it, we gave them
10 something to read in advance. We discussed their
11 roles, the standards and everything that they're
12 looking at.

13 So we do it, and that's easily
14 outlinable. That's not a problem at all.

15 So there are several things like that
16 that I would feel extremely confident in. You
17 know, the concerns that we have as well are
18 related to the 75 percent completion rate that
19 was called out.

20 And I will note that in 2017 when we
21 came with a question, but it was deemed to be
22 meeting the criteria. Even under the focused

1 review.

2 So from our perspective it was, okay,
3 we were there, it was good, so maybe we didn't do
4 enough to articulate why it's still an accurate
5 thing for us. But it was already told to us by
6 the Department in NACIQI and the senior
7 department official that that met the criteria at
8 that point. So things have changed, understood,
9 those kind of things.

10 But that one, and the program length,
11 is a big one for us. Because we don't have the
12 set program lengths, we have units. Even our
13 units, when we say 400 hours, some units are
14 extended over the course of a year because they
15 are part-time programs for people.

16 So is that a 400 hour program, is that
17 a year long program, how does that get defined.
18 That's what we need to be looking at. Do we need
19 to look a little more carefully about setting a
20 real program length and then there are exceptions
21 to that program length at times and then figuring
22 that out.

1 You know, when students apply to CPE
2 they go through an interview process. And in the
3 center they talk about, what are their goals, why
4 are they coming. Why are they coming to CPE,
5 what are they intended to do. Get the one unit
6 ordination. Are they coming to discern this as
7 potential career, are they looking for a
8 particular job piece, are they looking for
9 certification. And so they get a sense through
10 that conversation of what it will take.

11 But there is no guarantee. Even
12 though board certification by our cognate
13 partners require 1,600 hours. It also requires
14 meeting outcomes and objectives.

15 So you might spend 1,600 hours doing
16 this, but you're not necessarily going to meet
17 the outcomes and objectives because those are
18 developmental in nature. And different people
19 are going to meet them in different ways,
20 depending on their background and their life
21 experience, their academic world. Lots of
22 factors that go into it. And Randy can address

1 some of those things as well.

2 But it's a very complex ecosystem that
3 looks into this in terms of demonstrating
4 competencies in that realm. So those are the two
5 areas that I think we'll need more time in and
6 more discussion.

7 The other ones I feel, if we were, six
8 months we would have policies in place. And some
9 of those policies we've already switched. You
10 know, the complaint policy, making sure we're
11 addressing it within a certain amount of time,
12 already done.

13 Making sure that we have notifications
14 or programs within seven days of a negative
15 accreditation decision, already done. Those
16 things are ready to go for approval by our
17 commission. So we've already made great progress
18 on those things.

19 VICE CHAIR PRESSNELL: Yes, I think
20 the, from a personal standpoint I think that the
21 program of length issue is largely a, a bit of a
22 consumer protection piece in there if you will

1 that just allows what the incoming student to
2 understand the requirements that are necessary.
3 It sounds like you may be doing that.

4 I think, you know, you may need to
5 work with the Department because it is very
6 complex. And I get it. Because again, it
7 depends on who the end provider is, what they
8 want. It also depends on what the student
9 ultimately wants.

10 But there ought to be some
11 documentation around, in general, this is what it
12 takes to satisfy this. And with this partner
13 this hospital partner, they require use of that,
14 it means this for you.

15 And so, you may already be doing it,
16 but if you can document that I think that will
17 take you a long way. And I'll let the Department
18 determine compliance, but anyway. So thank you,
19 Mr. Chairman.

20 CHAIR KEISER: Wally, then Kathleen
21 and then Jennifer.

22 W. BOSTON: Thank you, Art. So, I was

1 a bit curious that you all initially asked for
2 online recognition and then removed that request.
3 Particularly when, and I look at one of the
4 Department's recommendations is that you accredit
5 programs and not centers.

6 And listening to your explanation
7 about different people's needs and requirements,
8 depending on the job and their experience, it
9 seems to me that it would be easier to
10 standardize the classroom part. Not recommend
11 that you go there, but when I look at the list of
12 your centers, a number of them are a part of a
13 hospital chain or a healthcare chain or a VA.

14 And so, it just seems to me that with
15 this very diverse, very descriptive group of
16 locations, primarily in hospitals, I think you
17 said 95 percent, that coming to an ultimate
18 ability to supervise, the clinical part is
19 difficult enough on its own, but the
20 instructional part, the curriculum, seems to me
21 could be much more standardized.

22 And I was just surprised that you

1 actually removed the request for online because
2 it could make your partners perhaps more
3 efficient, cost efficient. And maybe even
4 provide a way to get more people able to complete
5 these programs in quicker, quicker time.

6 M. MEDWED: You're 100 percent spot
7 on. And we didn't remove it because we're not
8 going to be doing it, we removed it because of
9 the timing of the rescision of the guidance letter
10 of August, I believe it was rescinded in August
11 of 2020, that the 50 percent threshold for
12 videoconferencing, which we fell under, we didn't
13 need any dispensation for that. Even though we
14 had added it after conversation with our previous
15 analyst in 2019.

16 But the regulation wasn't removed
17 until August of 2020. We submitted our petition
18 in September of 2020, initially. So we didn't
19 have the new regulations. And we didn't have any
20 observation and assessment of distance learning
21 under the new regulations to be able to include
22 in our petition.

1 And then with the leniencies that were
2 afforded by COVID to be able to do that, to be
3 able to use, to bring in the video, in
4 conversation with L.G. and the Department, we
5 decided to drop it. And then when the leniencies
6 for COVID expire, we're working currently on
7 building that back into our model now that we
8 need to be assessing distance learning in a
9 different way, that's based on the new
10 regulations, so that we can add it back into our
11 scope.

12 W. BOSTON: So your plans are to add
13 it back in, but you're taking it away so you can
14 be in compliance with this current renewal
15 request?

16 M. MEDWED: Correct.

17 W. BOSTON: Okay, thank you.

18 CHAIR KEISER: Kathleen, then
19 Jennifer, then Bob.

20 K.S. ALIOTO: Thank you for your work.
21 I wondered, you have mentioned that you didn't,
22 you have to screen people so that you wouldn't

1 get somebody who was on a crusade, which I think
2 is a great idea. But I'm wondering, what is the
3 profile?

4 You mentioned that some of your
5 participants are former seminarians, but what is
6 the general profile of the people who go into
7 pastoral care to benefit us?

8 T. HAYTHORN: That's a lovely
9 question, and a very difficult one to answer as
10 well. We have people who come from probably
11 every tradition that all of you on this call
12 might represent, plus all of the ones that are in
13 your extended families, which often make those
14 family gatherings so interesting.

15 We have, we work closely with the
16 humanists. We work closely with evangelical
17 institutions. We have students who come from
18 such diverse places, such as Harvard Divinity
19 School and Liberty University Seminary. I mean,
20 it is quite a mix.

21 What our programs are most often
22 paying attention to is the curiosity of the

1 students, their willingness to learn and what
2 their professional goals are at that time. What
3 are they going to do with this education and
4 where are they going.

5 And how open are they to learning in
6 a kind of group and experiential learning
7 environment. Is this a good fit for them.

8 So every program we'll do a series of
9 interviews to assess whether or not the student
10 demonstrates kind of readiness to be apart of the
11 program. Most often they will require a, either
12 that they are in process for a masters of
13 divinity degree or completed it, or have an
14 equivalence.

15 Because many traditions, for example,
16 there are Buddhists, masters of divinity degrees
17 out there. We have many Buddhist students now,
18 so looking at equivalency across all of these
19 different traditions.

20 The typical student who comes to us
21 really has a draw towards hospital chaplaincy or
22 deepening their ability to be a spiritual care

1 provider within a context of interest to them.

2 And those contexts are only growing.

3 When you look at folks that have gone
4 into congregational leadership, the Department of
5 Labor data shows a precipitous decline since the
6 1960s across the United States, across
7 traditions. When you look at chaplaincy it's
8 held steady and actually grown.

9 So, many of our people will still go
10 into a congregational setting, but many of them
11 are looking for ways of what we call developing
12 portfolio careers where they might be working
13 part-time for hospice and then part-time for a
14 congregation. And listening for those kinds of
15 interests to see how this program can be a good
16 fit for them.

17 K.S. ALIOTO: And do you have many
18 veterans that are part of your program?
19 Programs?

20 T. HAYTHORN: We do. And they don't
21 exclusively go to VAs as well. So they are
22 plugging into a variety of different settings.

1 And part of the hope is that this is
2 an opportunity to do some integrative work. And
3 many of our programs are really paying attention
4 to things like trauma informed care and moral
5 injuries. So those have been really important
6 for the veterans.

7 The next two days I'm actually meeting
8 with you from San Diego. I'll be meeting with
9 the Navy chaplains for two days over their
10 professional development time. So we stay
11 actively involved in that and feel like it's a
12 really important part of our mission.

13 K.S. ALIOTO: And what is the
14 percentage of women?

15 T. HAYTHORN: It only grows. Marc, is
16 it, are we at 45 percent, 48 percent?

17 M. MEDWED: I think right around
18 there. Yes.

19 T. HAYTHORN: Yes. In terms of total
20 participants in programs there is a little
21 because of different traditions.

22 As you might imagine there was a time

1 where there were not a lot of Catholic women who
2 were participating until Catholic Sisters began
3 to find their way in. So women religious were
4 very involved. But some of that depends on the
5 religious traditions somebody might be from as
6 well.

7 K.S. ALIOTO: And finally, when you
8 work in hospitals, does the hospitals do the
9 medical piece of the training for people or do
10 you do that?

11 T. HAYTHORN: Randy, can you speak to
12 that?

13 R. HALL: So let me be clear about
14 what you're asking. For the CPE students, the
15 medical training, the orientation to the clinical
16 area, is that what you're asking or?

17 K.S. ALIOTO: Those who are going to
18 work in hospitals. And you indicated that the
19 majority were doing that kind of pastoral work.

20 R. HALL: Yes. I think that the
21 orientation that we give to a student, and in the
22 training that we develop, the ongoing training of

1 the 300 clinical hours, that where the clinical
2 area is really a classroom. We're bringing
3 people in who have been on some level of
4 experience in providing care as a clergy person,
5 but not necessarily in the clinical area.

6 I mean, this is one of the richness of
7 CPE is that when we're sitting around the group
8 learning table reflecting on the work that's been
9 done in the clinical setting, there is a variety
10 of voices there. People of different
11 dominations, or different faiths, are not, you
12 know, circular faiths that just work together and
13 have a conversation that they normally would not
14 have.

15 People sometimes come a little bit
16 closed in on their perspective from their
17 denomination or from their religious perspective.
18 But then when we're in the clinic, they have to
19 be available to all folks who are dealing with
20 their health issues. And that conversation, the
21 richness of the conversation that happens in the
22 learning, really becomes part of the curriculum

1 in that way.

2 K.S. ALIOTO: And to go back to my
3 original question, how do you screen out people
4 who are on crusades?

5 R. HALL: Well that's a good question.
6 You know, the interview process, the application
7 process requires some essays, reflections,
8 showing the reflections. And then they have a
9 in-person interview where we do explore that and
10 deal with recognition of how they're open to
11 diversity and open to not evangelizing, not
12 trying to look to provide care using the
13 perspective from which the patient or the staff
14 member is working from.

15 So we screen that out as best we can.
16 And then we hold the student to that
17 responsibility. We have a set of what the
18 student's responsibilities are within the
19 clinical setting and this learning model.

20 So that's part of the overall
21 completion rate in some ways. So the student is
22 not adhering to those things and that does

1 warrant dismissal from the program. But we do,
2 we seek to do the best screening job that we can
3 on that. But then we hold the student
4 accountable as their in the program.

5 T. HAYTHORN: Yes, just to add to that
6 Randy. Proselytization is a violation of our
7 ethics code. So if a student is found that they
8 are proselytized then they would be removed from
9 the program. Or at least suspended until
10 remedial action could take place.

11 K.S. ALIOTO: Well thank you for your
12 work on behalf of some many suffering people.

13 R. HALL: Thank you.

14 CHAIR KEISER: Jennifer.

15 J. BLUM: Yes. So Wally asked my vet
16 question. I looked at my notes and I was like,
17 ugh, I forgot to ask it. So Wally took care of
18 that one. So thank you for that.

19 But I did also, Claude, your exchange
20 with Claude was extremely helpful to me in
21 understanding a little bit about the, both the 75
22 percent and the program lengths issue. And I

1 just, I would throw out your comment.

2 I think that you're thinking, I think
3 the way to think about it is a sort of, it's not
4 a course, a unit based retention. You don't,
5 like these benchmarks I think we, we collectively
6 sort of over talk some sometimes. And I think
7 because you, I have a higher appreciation now for
8 the qualitative aspects of what it is that you're
9 employers, and your students, are seeking, and it
10 varies.

11 I encourage you to think about it in
12 the context of that 400 units, but it's not a
13 completion. Like, how you identify it and how
14 you speak to it I think is really important.

15 And then the other tricky piece, in my
16 view is, that 75 percent, as it relates to the
17 three students or the five students, you have a
18 little bit of an issue there because some
19 students are going on to do different things.

20 And so, just this unit based concept
21 as a retention model, and then an overly of, I do
22 think it will be helpful, and I guess I'm clarity

1 here, I think for anyone who wants to understand
2 what you do, understanding the clarity around
3 program lengths that relates to, there must be
4 industry standards.

5 So you said, some only need 400, some
6 need 1,600, is categorizing those so that there
7 is a better transparency. And I'm using that
8 word very purposely. Transparency around the
9 objective that then you're analyzing from a
10 student achievement basis. And that's, right
11 now, what I find backing. I have lots of faith
12 that it won't be lacking in 18 months.

13 CHAIR KEISER: Bob.

14 B. SHIREMAN: Thank you so much for,
15 for the work that you are doing.

16 In response to Jennifer's question
17 earlier, you referred to the Department of
18 Education as a higher authority, which made me
19 laugh.

20 And, but I did want to seriously kind
21 of respond to that because really, the purpose of
22 recognition by the Department of Education, is

1 recognition by the federal government that you
2 are the higher authority when it comes to the
3 quality of education, the quality of what
4 students are getting.

5 How, you know, how good the
6 institutions are.

7 And, I think we, the Department of
8 Education, federal government has a problem where
9 what's happened over time, is that agencies knew
10 agencies or niche agencies that want credibility,
11 try to figure out how can we get approval, how
12 can we get recognized by the Department of
13 Education.

14 Because that gives them credibility.
15 But really, it should be the Department of
16 Education recognizing agencies that on their own,
17 because of what they do and because of the
18 respect in a field, have, have credibility.

19 And, I made a really good example of
20 that, one that is not recognized by the
21 Department of Education, but probably is one of
22 the most respected accrediting agencies out

1 there, is the engineering accrediting agency.

2 They don't bother to deal with all of
3 the Department of Education stuff as you know,
4 and I as think they know. It's a pain.

5 Like look at all this stuff you're
6 going to have to deal with over the next few
7 months, responding to these pesky little
8 questions about documents and everything.

9 I went back during this discussion and
10 looked at the federal connection, you know, sort
11 of, you know, what you are claiming for what you,
12 why you need the federal approval.

13 And, I think even the staff response
14 was, you know, this is pretty thin. It's pretty
15 narrow. Like there's not that much of a federal
16 connection there.

17 So I just wanted to lay out there that
18 if you want to not really have to deal with all
19 of these things that we're asking about, I'm not
20 sure you really need to.

21 And, you seem like a very good and
22 respected agency. And, I don't think being

1 recognized by the Department gives you any
2 greater credibility and respect.

3 So consider it. I'm, you know, not
4 saying you should get kicked out or anything, but
5 consider that.

6 T. HAYTHORN: Oh, Bob, oh, Bob, I'd
7 like to gather together every religious person I
8 could, and seat them around a table and ask you
9 to make that argument again, while they're
10 surrounded by state legislators and federal
11 legislators.

12 Because you're just asking for a mosh
13 pit of ugly, let me just be clear.

14 Our work for so many places, as soon
15 as we start talking about the religious nature of
16 the work, people get squirrly in a hurry.

17 And, part of what they're looking for
18 is who the bona fide accredited program that we
19 can trust.

20 And, because many of the institutions
21 that we're working with, already have many other
22 accredited programs, that relationship with the

1 DOE makes us on par, if you will, with those
2 other accredited pieces.

3 Sure, there are a lot of other things
4 we could be spending our time with this
5 afternoon. You're lovely people; it's great to
6 be with you; we hope that you have fantastic
7 lives.

8 And, we also recognize that there was
9 a reason that we started doing this work with the
10 Department, over 50 years ago.

11 And, that the folks who really sought
12 recognition in the beginning, recognized the
13 complexities of state and faith-based
14 organizations. And, it feels like especially
15 now.

16 I feel like we're in a moment right
17 now, where we need a kind of clarity that the
18 kind of accreditation we can bring, with the
19 recognition of the Department, is going to put a
20 lot of minds and consciences at ease, to keep
21 doing this work going forward.

22 And, as we've noted with COVID, it has

1 never been more necessary.

2 So, thank you and I respectfully
3 disagree.

4 CHAIR A. KEISER: Steve? You're muted,
5 Steve.

6 You're muted.

7 S. VAN AUSDLE: That might have been
8 the most profound thing I've said all day; you
9 missed it.

10 CHAIR A. KEISER: I thought so.

11 S. VAN AUSDLE: You're an association.
12 That implies you have members of this association
13 that actually offer these programs?

14 T. HAYTHORN: That is correct.

15 S. VAN AUSDLE: You're not in the
16 direct delivery mode of programs?

17 T. HAYTHORN: That is correct.

18 S. VAN AUSDLE: And, how many members
19 do you have, that you accredit?

20 T. HAYTHORN: We have currently 450
21 sites that we, program sites that we accredit.

22 S. VAN AUSDLE: Sites. Now, there's

1 where I'm trying to get the member of the
2 association, and the sites.

3 So how many members would service
4 those 400 sites?

5 T. HAYTHORN: So we have 850 educators
6 that service those sites.

7 S. VAN AUSDLE: Okay. But these aren't
8 organizations that you're accrediting, you're
9 actually accrediting the sites?

10 T. HAYTHORN: Programs within those
11 sites.

12 S. VAN AUSDLE: Okay, okay.

13 So as we look at trends right now, it
14 appears that a lot of emphasis, and federal
15 investment will go into mental, mental health.

16 Do you see a role for your graduates,
17 as we create more inpatient programs around the
18 nation?

19 T. HAYTHORN: Absolutely. In fact, we
20 are trying to pay attention, and be more wise
21 than we were when we were first founded back in
22 1967.

1 Because at that time, many of our
2 programs were in mental health institutions
3 across the country.

4 And, as you probably know, the
5 institutionalization movement during the 70's
6 meant that we made a shift.

7 And, with the rapid growth of health
8 care, many of our programs went into health care
9 because they could be addressing similar kinds of
10 developmental goals, and aspirations.

11 So, we want to be wise as we're
12 watching where things are, but we also feel like
13 we've got not just a critical need to care for
14 the mental health issues of individuals from the
15 community, but in a lot of our context, our folks
16 have begun to pay much more attention to the
17 mental health of staff.

18 I can tell you some very dramatic
19 stories that you don't need to hear today, about
20 conversations with educators who had to drop off
21 of phone calls, to go tend to critical
22 emergencies because physicians have taken their

1 own lives.

2 That's the context that a lot of our
3 folks are working in right now.

4 So both those who are coming in
5 needing mental health care, and the staff, and
6 it's a big part of what I'll be talking about
7 with the navy chaplains tomorrow, is providing
8 care for navy medical officers.

9 So, yes, you are pointing to a
10 critical need that's going to be around for at
11 least another decade.

12 S. VAN AUDDLE: I wish you well as you
13 address these 18 criteria that we're still
14 missing information on.

15 And, I'm assuming you can do it
16 because you're that relevant.

17 I'm still a little bit confused on you
18 as an association, and all these programs out
19 here, but the association, the members are not
20 each of the programs, right?

21 Somebody's the delivery system.

22 T. HAYTHORN: Mark, you want to do

1 that? Maybe you can say that more clearly.

2 M. MEDWED: So, right, we have 850
3 certified educators who have gone through ACPE
4 certified, certification process.

5 And, they work in these programs.
6 They're members of our association.

7 (Simultaneous speaking.)

8 S. VAN AUSDLE: Yes.

9 M. MEDWED: And, they do the, they
10 serve the accreditation of the centers, of the
11 programs. Within there.

12 So some programs may have two or three
13 educators working in them, or more if they're a
14 large program. Others might be smaller programs
15 and have a solo educator working in them.

16 S. VAN AUSDLE: That's helpful to me.
17 Wish you the best of luck.

18 T. HAYTHORN: Thank you.

19 M. MEDWED: Thank you.

20 (Pause.)

21 CHAIR A. KEISER: Thank you.

22 L.G., do you have any comments

1 regarding the presentation by the agency?

2 L. CORDER: Yes, I'll make three quick
3 comments if I can, just points of clarification.

4 So the federal link for this agency we
5 spent more time than I care to recall, teasing
6 through a federal link.

7 Once we have the dots in place and we
8 connect those dots, we have a blank. What we
9 have cautioned the agency about, is that it's,
10 it's end link, it's non-HEA federal program, they
11 don't have very many in that boat, and if they
12 lose it, they lose their link.

13 So we have cautioned the agency that
14 they really need to investigate further, whether
15 or not they can establish some other federal
16 links.

17 But the one we have, we're confident
18 in.

19 There was a comment about the 2017
20 student achievement versus the present day. I
21 did look backwards some, but and you will see if
22 you go back and look at that petition, that we

1 did have some questions then.

2 At the end of the day, we have a duty
3 to conduct a present-day analysis. And, so
4 you've heard today that there are other questions
5 here from committee members about that.

6 And, so we're confident in our
7 findings and staff determination on that issue.

8 Last was a question from one of the
9 committee members, about the removal of distance
10 education.

11 I just want to clarify, we did not
12 counsel removing that. What we did advise the
13 agency was, if it is going to maintain that in
14 its scope of recognition, it must meet all
15 applicable criteria.

16 If it chooses to remove it, and it has
17 programs that fall under the current COVID
18 flexibilities, whatever those flexibilities
19 provide for, that that applies to them until
20 they're out of existence.

21 And, then if the agency wants to
22 continue to work with programs that are

1 conducting distance education, they've got to
2 come back and go through that process.

3 But that's all I have. Thank you very
4 much.

5 CHAIR A. KEISER: Thank you.

6 Permanent readers, would you like to
7 make a motion?

8 J. BLUM: I have a question about the
9 motion. I was waiting until now to ask it.

10 Because I think this is the first
11 agency that we have up that is both a compliance
12 report, and a monitoring report.

13 Is that just from a technical
14 standpoint is that one motion, or two motions?
15 So I think I'm looking to LG or Herman, to just
16 from a process standpoint, how do we do the
17 motions?

18 L. CORDER: I'm also going to look at
19 Herman, because I don't know.

20 H. BOUNDS: Yes, I'm pulling up the,
21 the final staff report now.

22 J. BLUM: I mean I kind of thought it

1 was, I mean I'll tell you my two cents. I think
2 it's two motions because when I look at your
3 sample, the language for motions, I think it
4 almost has to be, I don't want to vote twice
5 necessarily.

6 So maybe we can fold them into the
7 same motion. But they're two different findings,
8 how about that? Like it's a, you know,
9 supporting the Department on two separate
10 findings.

11 Because there's a finding --

12 (Simultaneous speaking.)

13 CHAIR A. KEISER: Jennifer?

14 J. BLUM: Yes?

15 CHAIR A. KEISER: Jennifer, if you look
16 on the screen right now, you'll see the
17 recommended motion, which includes both the
18 compliance report, and the monitoring report.

19 VICE CHAIR PRESSNELL: Well, actually
20 it doesn't. That's another part of the problem.

21 J. BLUM: That is part of the problem
22 because --

1 (Simultaneous speaking.)

2 VICE CHAIR PRESSNELL: Because the
3 problem is --

4 J. BLUM: -- it -- yes.

5 VICE CHAIR PRESSNELL: Yes, this deals
6 only here with the monitoring report.

7 (Simultaneous speaking.)

8 CHAIR A. KEISER: No.

9 VICE CHAIR PRESSNELL: Within here
10 there are about 15 other outstanding --

11 (Simultaneous speaking.)

12 J. BLUM: No, the first paragraph
13 references the compliance report, and the second
14 report references the monitoring report.

15 But the source of confusion, I think,
16 is it on the compliance report it doesn't, on
17 that paragraph it doesn't list the myriad issues
18 that the agency has to comply with.

19 And, so that's why I, I both in the
20 staff report and then now, I think it's not
21 entirely clear.

22 But I'm comfortable with this motion

1 as long as everybody understands that under that
2 compliance report are like, you know, whatever it
3 is, 15 items.

4 And, then under the monitoring report
5 are two.

6 B. SHIREMAN: Because my, this goes to
7 my question from earlier, but there are a bunch
8 of items that are compliance items.

9 Doing it this way makes it seem as if
10 these are the most important things, and that the
11 compliance items are not.

12 That may be the case, but I don't know
13 that, that it is.

14 J. BLUM: I completely agree with you.

15 B. SHIREMAN: So I guess I would maybe
16 go along with a more, either a longer motion that
17 includes everything, or a shorter motion that
18 makes references to the compliance and monitoring
19 issues, identified in the staff report.

20 CHAIR A. KEISER: I would agree with
21 the second that you would say Bob. Shorter is
22 always better. It's clearer.

1 So, Jennifer --

2 (Simultaneous speaking.)

3 J. BLUM: Yes, so what I would do is
4 delete the, so I think what I would do is first
5 paragraph's all right.

6 The second paragraph, what I would
7 probably do is delete from, the agency is in
8 substantial compliance with, the citation.

9 Well, I think you have to say the
10 agency is in substantial compliance with two
11 criteria, you know, for which a monitoring report
12 will be required in 12 months.

13 And, then sort of like see staff
14 report, or something.

15 B. SHIREMAN: I mean, I don't think you
16 even need to say the number. I mean they're in
17 the issues and problems of the staff report.

18 J. BLUM: Right.

19 B. SHIREMAN: And, if we make reference
20 to, if we say that our, you know, I mean I'm
21 looking down at the recommendations.

22 Renew the agency's recognition subject

1 to the submission of a compliance report, and
2 then, so somewhere in there it needs to be an
3 and, and the, and address the monitoring issues
4 identified in the staff report.

5 J. BLUM: Yes, subject to the
6 submission of a compliance report addressing the,
7 the non-compliant criteria, you know, stated in
8 the Department's staff report. Due in 12 months.

9 So like that first sentence you could
10 add after compliance report, addressing the non-
11 compliant.

12 CHAIR A. KEISER: I think we're in
13 agreement, we just --

14 (Simultaneous speaking.)

15 VICE CHAIR PRESSNELL: Yes, if you --

16 CHAIR A. KEISER: Monica, if you could
17 just write it down.

18 VICE CHAIR PRESSNELL: But either that,
19 or we just add to the end of the first paragraph,
20 you know, remaining issues as summarized in the
21 staff report.

22 J. BLUM: That's fine.

1 VICE CHAIR PRESSNELL: Yes, I, you
2 know, I certainly get it what you're saying. I
3 think that when we --

4 (Pause.)

5 (Simultaneous speaking.)

6 B. SHIREMAN: I think it would be much
7 simpler --

8 VICE CHAIR PRESSNELL: -- what do you
9 substantially compliant in, and I get that.

10 And, I also get boy, they should have
11 listed the 15 other items that are remaining.

12 B. SHIREMAN: What if we make it much,
13 much simpler and just say, so renew the agency's
14 recognition as a nationally recognized
15 accrediting agency at this time, subject to the
16 compliance report and monitoring issues,
17 identified in the staff report.

18 CHAIR A. KEISER: Due in 12 months.

19 J. BLUM: Due in 12 months.

20 B. SHIREMAN: In 12 months.

21 J. BLUM: That sounds good to me.

22 H. BOUNDS: Just --

1 (Simultaneous speaking.)

2 CHAIR A. KEISER: Herman?

3 H. BOUNDS: Yes, I was just going to
4 say is that you just have to make a clear
5 distinction, because remember the monitoring
6 items are requiring the monitoring report, and
7 the non-compliant issues.

8 The substantial compliant issues are
9 requiring the monitoring report, and the non-
10 compliant issues are, are requiring the
11 compliance report.

12 So, so for me for clarity, you could
13 just add at the end of that first sentence, that
14 the compliance, that the compliance report, those
15 items are identified in the staff, you know, in
16 the final staff analysis.

17 And, then you talk about the
18 monitoring, the substantial compliance issues
19 after that.

20 But.

21 VICE CHAIR PRESSNELL: You know, which
22 is kind of what I was recommending.

1 CHAIR A. KEISER: Right, exactly.

2 VICE CHAIR PRESSNELL: Is that you just
3 put at the end of that first, as outlined as
4 remaining issues in the staff report.

5 CHAIR A. KEISER: And somewhere --

6 (Pause.)

7 VICE CHAIR PRESSNELL: And, then going
8 forward, maybe we could pick more simple
9 language. But this is --

10 (Simultaneous speaking.)

11 H. BOUNDS: Right. That's true. I
12 agree, Claude.

13 VICE CHAIR PRESSNELL: -- too darned
14 complicated.

15 H. BOUNDS: I agree; I agree. We can
16 work on that.

17 CHAIR A. KEISER: Well, I need a
18 motion.

19 So, and we're not going anywhere but
20 what's on the shared material. So, Claude, could
21 you make the motion?

22 VICE CHAIR PRESSNELL: Yes, to renew

1 the agency's recognition as a nationally
2 recognized accrediting agency at this time,
3 subject to the submission of a compliance report
4 due in 12 months, and review and decision on the
5 compliance report.

6 In the event the recognitions
7 continue, the following decision for the
8 compliance report for the period of recognition
9 will not exceed five years from the date and
10 decision of the renewal of the accreditation
11 issued by the senior department officials.

12 I would add, this relates to the
13 remaining issues subject to compliance as
14 outlined in the staff report.

15 And, the agency is in substantial
16 compliance with, and then the rest of that
17 sentence, which deals with --

18 H. BOUNDS: You're talking quickly.
19 So, this relates to the --

20 (Simultaneous speaking.)

21 J. BLUM: Remaining.

22 H. BOUNDS: -- remaining issues. What

1 after that? This relates to the remaining --

2 (Simultaneous speaking.)

3 VICE CHAIR PRESSNELL: Put the
4 remaining, with the, yes.

5 J. BLUM: The remaining issues was the
6 problem.

7 VICE CHAIR PRESSNELL: Yes.

8 J. BLUM: The remaining issues or
9 problems found in the department staff report.

10 VICE CHAIR PRESSNELL: Yes.

11 H. BOUNDS: Problem, problems found.

12 J. BLUM: Well, that's your language
13 that you use in the staff report. That's why I'm
14 using it.

15 VICE CHAIR PRESSNELL: And, then hit
16 return on the word the, and that will separate
17 those two issues.

18 H. BOUNDS: Yes, it's difficult to
19 separate those.

20 VICE CHAIR PRESSNELL: Just hit return
21 then.

22 M. FREEMAN: It's in an Excel document.

1 I could transfer it to a Word document, too.

2 J. BLUM: That's fine.

3 VICE CHAIR PRESSNELL: Oh, that's
4 right. Whatever you can do then.

5 M. FREEMAN: Yes, I'm just going to put
6 a lot of spaces there so I'll know to make that a
7 separate paragraph later.

8 VICE CHAIR PRESSNELL: Right.

9 Yes, bottom line is, is the motion is
10 to fully satisfy the staff report, both on
11 compliance and monitoring issues.

12 CHAIR A. KEISER: Okay.

13 MALE SPEAKER: Go ahead, sorry.

14 CHAIR A. KEISER: There's a motion. Is
15 there a second?

16 J. BLUM: I'll second.

17 CHAIR A. KEISER: Jennifer seconds it.

18 Now we can have discussion.

19 B. SHIREMAN: I'm confused by the
20 motion we ended up with. I thought the whole
21 idea was let's not name the specific monitoring
22 things as if they're somehow heightened above the

1 compliance things that are not listed.

2 But we now have this still robust,
3 long thing. But --

4 (Simultaneous speaking.)

5 CHAIR A. KEISER: It doesn't say --

6 B. SHIREMAN: Did I misunderstand the
7 concern?

8 CHAIR A. KEISER: -- it should be
9 shorter, but that's, it does the same thing I
10 think, Bob, don't you think so?

11 B. SHIREMAN: I guess so, but, okay,
12 it's fine. It's not a problem and I guess the,
13 the transcript will reflect our shared joint
14 confusion.

15 J. BLUM: Yes, and Bob, I agree with,
16 I agree with you but in the interest of, I mean I
17 just, I think Herman, so I agree with Bob on a go
18 forward basis.

19 I don't think we necessarily need to
20 site the criteria of both either substantial
21 compliance or non-compliance on a go forward, as
22 long as we cite the staff report on a go forward.

1 And, that way we can be more succinct
2 in the motions.

3 (Simultaneous speaking.)

4 J. BLUM: Because on a go forward,
5 we're going to have other agencies in the future
6 that have both.

7 H. BOUNDS: Yes, I agree. We just
8 still have to distinguish the compliance issues
9 from the --

10 (Simultaneous speaking.)

11 J. BLUM: Right.

12 H. BOUNDS: -- so statute compliance
13 issues, because of the compliance report
14 requirement, and then the monitoring report
15 requirement is separate.

16 So we'll still have to somehow
17 identify those as different.

18 J. BLUM: Yes. But we can do that in
19 the staff report.

20 CHAIR A. KEISER: Okay, discussion?

21 I have just a comment. I'm concerned
22 we're relying upon the fact that they say they

1 can do these things.

2 I just don't get the solid feeling
3 because they've had a lot of time, and many of
4 these things are really not that big.

5 But I think we need to look carefully
6 at it in 12 months. There are a lot of issues
7 here, so.

8 That's just my comment. I don't vote,
9 so it's, unless you guys tie.

10 (No audible response.)

11 CHAIR A. KEISER: Hearing no more
12 discussion, motion is made and second.

13 We can go for a roll call.

14 Kathleen?

15 K.S. ALIOTO: Yes, yes, yes.

16 CHAIR A. KEISER: Roslyn?

17 R. ARTIS: Yes.

18 CHAIR A. KEISER: Jennifer?

19 J. BLUM: Yes, and I agree with Art on
20 the we'll see them back for the next meeting. Or
21 whenever it is that they're ready.

22 CHAIR A. KEISER: Did I see Ronnie

1 Booth? He came --

2 (Simultaneous speaking.)

3 R. BOOTH: Yes, yes.

4 CHAIR A. KEISER: Wally?

5 W. BOSTON: Yes.

6 CHAIR A. KEISER: Jill? Jill Derby?

7 J. DERBY: Yes.

8 CHAIR A. KEISER: David?

9 D. EUBANKS: Yes.

10 CHAIR A. KEISER: Michael?

11 M. LINDSAY: Yes.

12 CHAIR A. KEISER: Molly?

13 M. HALL-MARTIN: Yes.

14 CHAIR A. KEISER: Robert?

15 R. MAYES: Yes.

16 CHAIR A. KEISER: Mary Ellen?

17 M.E. PETRISKO: Yes, with a note that

18 we really need to get clear on this language

19 because there's another institute that has a

20 whole lot of stuff coming up, and the whatever

21 the language is, it goes after that agency has

22 got to be clear, and has got to be parallel to

1 what we say with this one.

2 CHAIR A. KEISER: Agree to that.

3 Claude?

4 VICE CHAIR PRESSNELL: Yes.

5 CHAIR A. KEISER: Bob?

6 B. SHIREMAN: Sure. Yes.

7 CHAIR A. KEISER: Zakiya?

8 Z. SMITH ELLIS: Yes.

9 CHAIR A. KEISER: Steven?

10 S. VAN AUUSDLE: Yes.

11 CHAIR A. KEISER: Okay, well that was
12 a unanimous vote.

13 It looks like we've covered our,
14 everything for the agenda for today. I don't
15 think we really want to start a new agency. I'm
16 a little worn out.

17 Unless anybody wants to start the next
18 agency and get it on with it, but.

19 R. MAYES: No.

20 J. DERBY: No.

21 CHAIR A. KEISER: I think we should
22 call it a day.

1 (Simultaneous speaking.)

2 CHAIR A. KEISER: Thank you everyone
3 for your hard work. Totally impressed with the
4 discussions, the level of detail by the members,
5 I think you really, you hit a home run today.

6 So thank you all and we will see you
7 tomorrow at 10:00 o'clock.

8 (Chorus of thank you and good bye.)

9 (Whereupon, the above-entitled matter
10 went off the record at 3:37 p.m.)

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