

Report of the Meeting

National Advisory Committee on Institutional Quality and Integrity

June 18-19, 2014



/s/

Susan D. Phillips, Chair

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DISCLAIMER

This report was written as a part of the activities of the National Advisory Committee on Institutional Quality and Integrity (NACIQI), an independent advisory committee established by statute. The NACIQI is subject to the Federal Advisory Committee Act and the regulations implementing that statute. This report represents the views of the NACIQI. The report has not been reviewed for approval by the Department of Education, and therefore, the report's recommendations do not purport to represent the views of the Department.

EXECUTIVE SUMMARY

Background:

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

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

Discussion:

At its June 18-19, 2014 meeting, held at the Holiday Inn- Capitol, Washington, DC, the Committee met to carry out its duties to advise the Assistant Secretary with respect to the recognition of accrediting agencies and State approval agencies. Following its review of agencies for recognition, the Committee heard testimony from a variety of leaders in higher education with varying perspectives and began its discussion of policy recommendations to advise the Secretary in preparation of the reauthorization of the Higher Education Act. Also, during the meeting, Deputy Undersecretary Jamiene Studley, spoke to the Committee in public forum regarding the Department’s higher education initiatives, particularly the college ratings system.

The Committee reviewed petitions for renewal of recognition from 16 accrediting and state approval agencies. Of these, thirteen renewals for recognition were based on a compliance report. In all instances, the Committee’s recommendations are the same as the staff recommendations

NACIQI members in attendance for all or part of the meeting included Susan D. Phillips (Chair), Arthur E. Keiser (Vice Chair), Simon J. Boehme, Jill Derby, Roberta L. Derlin, John Etchemendy, George T. French, Jr., William “Brit” Kirwan, Anne D. Neal, Richard F. O’ Donnell, William Pepicello, Arthur J. Rothkopf, Cameron C. Staples, Carolyn Williams, and Frank H. Wu.

U.S. Department of Education personnel who participated in the meeting included: Committee Executive Director Carol Griffiths, Accreditation Director Herman Bounds, Program Attorney Sarah Wanner, Office of Postsecondary Education staff: Herman Bounds, Elizabeth Daggett, Karen Duke, Jennifer Hong-Silwany, Patricia Howes, Charles Mula, Steve Porcelli, Cathy Sheffield, and Rachael Shultz.

THE RECOGNITION OF ACCREDITING AGENCIES AND STATE APPROVAL AGENCIES:

The Committee reviewed petitions and reports from 16 agencies – thirteen accrediting agencies, one State approval agency for vocational education and two state approval agencies for nurse education.

Summary of Agency-Related Actions Taken by the Committee:

I. Petitions for Renewal of Recognition as Nationally Recognized Accrediting Agencies including any Expansion/Contraction or Revision in the Scope of Recognition as Currently Written.

National Association of Schools of Dance, Commission on Accreditation (NASD)

Action for Consideration: Petition for Renewal Recognition.

Current and Requested Scope of Recognition: The accreditation throughout the United States of freestanding institutions that offer dance and dance-related programs (both degree and non-degree-granting), including those offered via distance education.

Committee Recommendation: Vote: 13-0

NACIQI recommends that the agency’s recognition be continued and that the agency be required to come into compliance within 12 months, and to submit a compliance report that demonstrates the agency's compliance with the issues identified in the staff report.

Comments: The Committee found the agency to be operating in compliance with the criteria for recognition, except for the issues identified below:

§602.16(a)(1)(i)	§602.16(a)(1)(ii)	§602.16(a)(1)(iv)	§602.16(a)(1)(v)
§602.16(a)(1)(vi)	§602.16(a)(1)(ix)	§602.16(a)(1)(x)	§602.16(b)(c)
§602.19(b)	§602.22(a)(1)	§602.22(a)(2)(i-vii)	§602.22(a)(2)(ix-x)
§602.22 (c)	§602.22(c)(1)	§602.22(c)(2)	§602.22(c)(3)
§602.23(d)	§602.24(a)	§602.24(b)	§602.24(c)(1)
§602.24(c)(2)	§602.24(c)(3)	§602.24(c)(4)	§602.24(c)(5) §602.28(c)

Most of the outstanding issues require the agency to demonstrate revision of policies, procedures and information in the agency's handbook. The Committee had no questions for the staff pertaining to the agency’s petition. The agency was queried, briefly, about any differences in its application of standards to institutions for which it is the institution’s Title IV gatekeeper and its application of standards for those institutions that have regional accreditation as their gatekeeper.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:

John Etchemendy; Anne Neal

Representatives of the Agency:

Dr. Karen P. Moynahan, Executive Director, National Association of Schools of Art and Design, Dance, Music and Theatre
Mr. Richard F. Mann, Legal Counsel, Keller and Heckman

National Association of Schools of Music, Commission on Accreditation (NASM)

Action for Consideration: Petition for Renewal of Recognition.

Current and Requested Scope of Recognition: The accreditation throughout the United States of freestanding institutions that offer music and music related programs (both degree and non-degree-granting), including those offered via distance education.

Committee Recommendation: Vote: 12-0 (Recusal: Derlin)

NACIQI recommends that the agency's recognition be continued and that the agency be required to come into compliance within 12 months, and to submit a compliance report that demonstrates the agency's compliance with the issues identified in the staff report.

Comments: The Committee found the agency to be operating in compliance with the criteria for recognition, except for the issues identified below:

§602.16(a)(1)(i)	§602.16(a)(1)(ii)	§602.16(a)(1)(iv)	§602.16(a)(1)(v)
§602.16(a)(1)(vi)	§602.16(a)(1)(ix)	§602.16(b)(c)	§602.19(b)
§602.19(d)	§602.20(a)	§602.22(a)(1)	§602.22(a)(2)(i-vii)
§602.22(a)(2)(ix-x)	§602.22(a)(3)	§602.22(c)	§602.22(c)(1)
§602.22(c)(2)	§602.22(c)(3)	§602.23(d)	§602.24(a)
§602.24(b)	§602.24(c)(1)	§602.24(c)(2)	§602.24(c)(3)
§602.24(c)(4)	§602.24(c)(5)	§602.28(c)	

Most of the outstanding issues require the agency to demonstrate revision of policies, procedures and information in the agency's handbook. The Committee queried staff and the agency regarding the agency's ability to address all of the citations within one year and the agency's change in scope from 'units' offering music to its accreditation of freestanding institutions.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:

Jill Derby; William Pepicello

Representatives of the Agency:

Dr. Karen P. Moynahan, Executive Director, National Association of Schools of Art and Design, Dance, Music and Theatre
Mr. Richard F. Mann, Legal Counsel, Keller and Heckman

National Association of Schools of Theater, Commission on Accreditation (NAST)

Action for Consideration: Petition for Renewal of Recognition.

Current and Requested Scope of Recognition: The accreditation throughout the United States of freestanding institutions that offer theatre and theatre-related programs (both degree and non-degree-granting), including those offered via distance.

Committee Recommendation: Vote: 13-0

NACIQI recommends that the agency’s recognition be continued and that the agency be required to come into compliance within 12 months, and to submit a compliance report that demonstrates the agency's compliance with the issues identified in the staff report.

Comments: The Committee found the agency to be operating in compliance with the criteria for recognition, except for the issues listed below.

§602.16(a)(1)(i)	§602.16(a)(1)(ii)	§602.16(a)(1)(vi)	§602.16(a)(1)(ix)
§602.16(a)(1)(x)	§602.16(b)(c)	§602.19(b)	§602.22(a)(1)
§602.22(a)(2)(i-vii)	§602.22(a)(2)(ix-x)	§602.22 (c)	§602.22(c)(1)
§602.22(c)(2)	§602.22(c)(3)	§602.23(d)	§602.24(a)
§602.24(b)	§602.24(c)(1)	§602.24(c)(2)	§602.24(c)(3)
§602.24(c)(4)	§602.24(c)(5)		

Most of the outstanding issues are related to providing evidence that it has adopted final revisions to policy. The Committee queried staff and the agency regarding the agency’s ability to address all of the citations within one year

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:

Simon Boehme; William Britt Kirwan

Representatives of the Agency:

Dr. Karen P. Moynahan, Executive Director, National Association of Schools of Art and Design, Dance, Music and Theatre

Mr. Richard F. Mann, Legal Counsel, Keller and Heckman

II. Renewal of Recognition as Nationally Recognized Accrediting Agencies Based on Review of the Agency’s Compliance Report

Accreditation Commission for Education in Nursing (ACEN)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and requested Scope of Recognition: Accreditation of nursing education programs and schools, both postsecondary and higher degree, which offer a certificate, diploma, or a recognized professional degree including clinical doctorate, masters, baccalaureate, associate, diploma, and practical nursing programs in the United States and its territories, including those offered via distance education.

Committee Recommendation: Vote: 11-0 (Recusal: Derlin)

NACIQI recommends that the agency be granted an extension of its recognition, for good cause, for a period of six months and that the agency submit a report demonstrating its compliance with the cited criteria within 30 days of expiration of the six-month period, with reconsideration of recognition status thereafter, including a review of the report and an appearance by the agency at a NACIQI meeting to be designated by the Department.

The agency's report must include a completed plan and timeline toward achieving full compliance, any agreements made between ACEN and NLN that have been developed, and (a revision of the) By-Laws addressing the deficiencies under 600.14(a) and (b) which preclude(s) d NLN involvement and the impingement on the agency's independence going forward.

Comments: The Committee found the agency to be operating in compliance with the criteria for recognition, except for the issues listed below.

§602.14(a) §602.14(b)

These issues (involving the separateness and independence of the ACEN from the National League for Nursing (NLN) remain unresolved while litigation continues between ACEN and the NLN. Staff was queried about the progress that has been achieved thus far but most of the questions were addressed to the agency.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:
Cameron Staples; Frank Wu

Representatives of the Agency:
Dr. Sharon Tanner, EdD, MSN, RN, Chief Executive Officer, Accreditation Commission for Education in Nursing
Dr. Mary Lou Rusin, EdD, RN, ANEF, Accreditation Commission for Education in Nursing

Third Party Commenter:
Judith Halstead, Immediate Past President, National League for Nursing

Accreditation Commission for Midwifery Education (ACME)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation and pre-accreditation of basic certificate, basic graduate nurse-midwifery, direct entry midwifery, and pre-certification nurse-midwifery education programs, including those programs that offer distance education.

Committee Recommendation: Vote: 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period three years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Compliance report and supporting documentation submitted by the agency, and the Department staff analysis and report.

NACIQI Primary Readers:
Roberta Derlin; Cameron Staples

Accreditation Council for Pharmacy Education (ACPE)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation and preaccreditation, within the United States, of professional degree programs in pharmacy leading to the degree of Doctor of Pharmacy, including those programs offered via distance education.

Committee Recommendation: Vote: 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Compliance report and supporting documentation submitted by the agency, and the Department staff analysis and report.

NACIQI Primary Readers:
George French; Arthur Rothkopf

American Physical Therapy Association, Commission on Accreditation in Physical Therapy Education (CAPTE)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation and preaccreditation ("Candidate for Accreditation") in the United States of physical therapist education programs leading to the first professional degree at the master's or doctoral level and physical therapist assistant education

programs at the associate degree level and for its accreditation of such programs offered via distance education.

Committee Recommendation: Vote of 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three and one half years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:
Jill Derby; George French

Association for Biblical Higher Education, Commission on Accreditation (ABHE)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation and preaccreditation ("Candidate for Accreditation"), at the undergraduate level, of institutions of biblical higher education in the United States offering both campus-based and distance education instructional programs.

Committee Recommendation: Vote of 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:
Anne Neal; William Pepicello

Commission on Collegiate Nursing Education (CCNE)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation of nursing education programs in the United States, at the baccalaureate, master's, and doctoral levels, including programs offering distance education.

Committee Recommendation: Vote of 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)

NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:
Simon Boehme; William Kirwan

Liaison Committee on Medical Education (LCME)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation of medical education programs within the United States leading to the M.D. degree.

Committee Recommendation: Vote: 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three and one half years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Compliance report and supporting documentation submitted by the agency, and the Department staff analysis and report.

NACIQI Primary Reader:
Arthur Rothkopf

Middle States Commission on Secondary Schools (MS-CSS)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation of institutions with postsecondary, non-degree granting career and technology programs in Delaware, Maryland, New Jersey, New York, Pennsylvania, the Commonwealth of Puerto Rico, the District of Columbia, and the U.S. Virgin Islands to include the accreditation of postsecondary, non-degree granting institutions that offer all or part of their educational programs via distance education modalities.

Committee Recommendation: Vote: 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Compliance report and supporting documentation submitted by the agency, and the Department staff analysis and report.

NACIQI Primary Reader:
Arthur Keiser; Carolyn Williams

National Association of Schools of Art and Design (NASAD)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation throughout the United States of freestanding institutions and units offering art/design and art/design-related programs (both degree- and non-degree-granting), including those offered via distance education.

Committee Recommendation: Vote: 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)

NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three and one half years..

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:
John Etchemendy; Carolyn Williams

Southern Association of Colleges and Schools, Commission on Colleges (SACSCOC)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation and preaccreditation ("Candidate for Accreditation") of degree-granting institutions of higher education in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia, including the accreditation of programs offered via distance and correspondence education within these institutions. This recognition extends to the SACSCOC Board of Trustees and the Appeals Committee of the College Delegate Assembly on cases of initial candidacy or initial accreditation and for continued accreditation or candidacy.

Committee Recommendation: Vote: 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)

NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:
Roberta Derlin; Frank Wu

III. Renewal of Recognition as a State Agency Recognized for the Approval of Nurse Education Based on Review of the Agency's Compliance Report

Maryland Board of Nursing (MDBN)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report

Current Scope of Recognition: State agency for the approval of nurse education.

Committee Recommendation: Vote: 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of one and one half years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Compliance report and supporting documentation submitted by the agency, and the Department staff analysis and report.

NACIQI Primary Readers:
Simon Boehme; John Etchemendy

Missouri State Board of Nursing (MOSBN)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current Scope of Recognition: State agency for the approval of nurse education.

Committee Recommendation: Vote: 7-0 (Recusals: Derlin; French; Keiser; Neal; Pepicello)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of two and one half years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Compliance report and supporting documentation submitted by the agency, and the Department staff analysis and report.

NACIQI Primary Reader:
Carolyn Williams

IV. Renewal of Recognition as a State Agency Recognized for the Approval of Vocational Education Based on Review of the Agency's Compliance Report

Puerto Rico State Agency for the Approval of Public Postsecondary Vocational Technical Institutions and Programs (PRHRDC)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current Scope of Recognition: State agency for the approval of vocational technical education.

Advisory Committee Recommendation: Vote: 12-0 (1 Abstention) (Recusal: Pepicello)
NACIQI recommends that the agency be granted an extension of its recognition, for good cause, for a period of six months and that the agency submit a compliance report demonstrating its compliance with the cited criteria within 30 days of expiration of the six-month period, with reconsideration of recognition status thereafter, including a review of the compliance report and an appearance by the agency at a NACIQI meeting to be designated by the Department.

Comments: The Committee found the agency to be operating in compliance with the criteria for recognition, except for the issues listed below.

§603.24(a)(2)(iii)(A) §603.24(a)(2)(iii)(B) §603.24(a)(2)(iii)(C) §603.24(b)(1)(vii)
§603.24(b)(1)(xi) §603.24(b)(2)(iv) §603.24(b)(2)(vi) §603.24(b)(2)(vii)

Of the eight issues, above, five require additional documentation of the implementation of the agency's revised policies; one issue requires information related to the agency's standards review cycle; and two issues require additional information and documentation pertaining to the agency's policies and procedures pertaining to substantive change. The Committee queried the agency and staff at length about the dramatic change in the agency's condition since they had been reviewed in 2012.

Written Materials Reviewed by the Committee: Compliance report and supporting documentation submitted by the agency, and the Department staff analysis and report.

NACIQI Primary Readers:
Arthur Keiser; Cameron Staples

Representatives of the Agency:
Mrs. Ann M. Mockford, Executive Director, PRSAA

SUMMARY OF THE COMMITTEE'S POLICY-RELATED DELIBERATIONS

On Wednesday, June 18, 2014, the Committee heard an update by Ms. Jamie Studley, Deputy Undersecretary, U.S. Department of Education, on the Department's postsecondary initiatives. Specifically discussed was the new rating system being developed by her Office - relative to the accreditation work being accomplished by the Committee. Ms. Studley discussed the broad input that the Department received from the listening sessions it held across the country as well as the thoughtful responses and recommendations from higher education leaders and subject matter and technical experts on identifying appropriate measures, data sources, and formulas for generating useful and appropriate ratings. Based on its work thus far, the Department projects the release of a ratings system proposal later this year followed by a final version of the ratings system before the 2015-2016 school year.

After the presentation, there was a robust question/comment session between Ms. Studley and the Committee members on student learning outcomes and the role of accreditation in the effort to ensure quality in postsecondary education that is focused on student learning and student outcomes.

I. Overview of the Committee Deliberations on the Reauthorization of the HEA

During this year, the Committee was provided a series of opportunities for learning and discussion in preparation for its development of policy recommendations for the HEA reauthorization. As a foundation for its work, and to familiarize all Committee members on the current issues and conversations underway, the Committee –

- Conducted a literature review of information (House/Senate Committee hearings, Presidential/Departments initiatives, etc.) which was shared as background reading.
- Solicited a series of position papers or other commentary from leaders in higher education accreditation addressing the question, “What issues are critical to consider in advancing quality assurance in higher education, going forward?”
- Solicited written and oral comments from the public,
- Held a training Webinar on what has been on the legislative and executive scene for the last several years relative to higher education accreditation and,
- Designed a series of panels to engage the Committee in discussions with higher education leaders having a various perspectives and considerations in advancing quality assurance in higher education and viable recommendations for change to the Higher Education Act (HEA).

For this meeting, panels of higher education experts (list attached) , having various perspectives/considerations for advancing quality in higher education as well as recommendations for changes to the Higher Education Act (HEA), engaged the Committee in discussions, specifically addressing- What are the significant changes? What needs changing from the NACIQI's prior positions? What hasn't

been addressed that should be addressed now? And how can NACIQI, as a body, be more effective in advancing the goal?

Following the panel discussions, Dr. Susan Phillips, Chair, focused the committees' deliberation on what are the recommendation areas to be developed more fully. As the result of the discussion, the Committee's ideas/deliberations coalesced around four areas (and four cross-cutting themes) for further consideration and discussion -

Cross-cutting themes: issues of access, innovation, affordability, and quality in the context of each task area.

Area #1: Developing recommendations to SIMPLIFY

Issues raised under this category included, for example, common definitions, zero-based regulation in terms of what is asked of accreditors, and reduced data burden.

Area #2: Developing recommendations to enhance NUANCE (in the accreditation/recognition process)

Issues raised under this category of nuanced accreditation or recognition decisions included for example, risk-based accreditation, variable interval, or some approach that is not one-size-fits-all/yes or no.

Area #3: Developing recommendations about the relationship between quality/quality assurance and access to Title IV FUNDS

Issues raised under this category included the linkage/connection between aid compliance and quality assurance; the appropriate roles, functions, and relationships between the actors and the money; and looking at different models (for example, differential access) and how the aid-eligibility is connected.

Area #4: Developing recommendations about NACIQI's role and function

Issues raised under this category included a re-calibration of the NACIQI's level of engagement with higher education policy advisement, and NACIQI's relationship with the Department and other oversight entities (such as the Triad, Congress, etc.)

The projected timeline for subsequent subcommittee work (to include public comment) was outlined. The ensuing recommendations will be brought before the Committee at its December meeting for further discussion and refinement.

PANEL PRESENTERS

Panel A: Policy Perspectives

Clifford Adelman, Institute for Higher Education Policy

Judith Eaton, Council on Higher Education Accreditation

Peter Ewell, National Center for Higher Education Management Systems

Sally Johnstone, Western Governors Association

Panel B: Perspectives of Institutions

Terry W. Hartle, American Council on Education

Peter McPherson, Association of Public and Land-Grant Universities

George L. Pry, Association of Private Sector Colleges and Universities

Susan Hattan, National Association of Independent Colleges and Universities

Panel C: Perspectives of Accreditors

Joseph Vibert, Association of Specialized and Professional Accreditors

Elizabeth H. Sibolski, Council of Regional Accrediting Commissions