

U.S. DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

NATIONAL ADVISORY COMMITTEE ON
INSTITUTIONAL QUALITY AND INTEGRITY
(NACIQI)

MEETING

THURSDAY
JUNE 19, 2014

Holiday Inn Capitol
Columbia Ballroom
550 C Street, S.W.
Washington, D.C

PRESENT

SUSAN D. PHILLIPS, Chair
ARTHUR E. KEISER, Vice Chair
SIMON BOEHME, Student Member
JILL DERBY, Member
ROBERTA DERLIN, Member
JOHN ETCHEMENDY, Member
GEORGE T. FRENCH, Member
ANNE D. NEAL, Member
RICHARD F. O'DONNELL, Member
WILLIAM PEPICELLO, Member
ARTHUR J. ROTHKOPF, Member
CAROLYN WILLIAMS, Member
FRANK H. WU, Member

STAFF PRESENT

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

PRESENTERS

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

THIRD PARTY COMMENTER

BERNARD FRYSHMAN, Association of Advanced
Rabbinical and Talmudic Schools

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

2 8:36 a.m.

3 CHAIR PHILLIPS: So, good morning.
4 Good morning, all. Thank you for rejoining us
5 this morning, and we'll get under way with our
6 8:30 agenda start time. I'm Susan Phillips,
7 the Chair of the National Advisory Council on
8 Institutional Quality and Integrity. I
9 welcome you to here.

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

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

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

22 DR. DERLIN: Bobby Derlin,

1 Associate Provost, New Mexico State
2 University.

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

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

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

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

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

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

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

21 MR. BOEHME: Simon Boehme, former
22 student at Cornell University.

1 CHAIR PHILLIPS: Graduate of.

2 MR. BOEHME: Graduate.

3 (Laughter.)

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

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

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

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

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

22 And I'm also asked for members, if you

1 could take a look in your folder at the December
2 meeting date options. And if you know your
3 calendar and give it - give your notations to
4 Pat before you leave, that would be helpful.

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

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

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

20 In constructing that, we've invited
21 ourselves to educate and reeducate ourselves
22 about the issues at play. We had a webinar

1 earlier this year, and have set for ourselves
2 at this meeting the opportunity to learn from
3 three different perspectives, broadly
4 speaking, in the field: the policy - some policy
5 perspectives, some institutional
6 perspectives, and later on this morning, the
7 accreditation perspectives.

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

19 So, those are our tasks. And as we
20 have invited panelists to speak to us today,
21 we've asked them to address those areas as well
22 to speak to - of what - what of the

1 recommendations in the 2012 report do they see,
2 what has significantly changed, what needs
3 revising, clarifying, simplifying and
4 updating, what areas not addressed there
5 warrant our attention now, and what areas of
6 NACIQI role and operation could better serve
7 the goal of assuring quality in higher
8 education.

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

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

21 People have asked me if we
22 anticipate being done before the scheduled 1:15

1 closing moment, and the answer is, I don't know.

2 So, we'll see when we get there.

3 Any questions about today, or?

4 Okay. Let me move to then invite the panel of

5 perspectives of accreditors to join us at the

6 front table.

7

8 **PANEL C: PERSPECTIVES OF ACCREDITORS**

9

10 This is Joseph Vibert, the

11 Association of Specialized and Professional

12 Accreditors, and Elizabeth Sibolski, the

13 Council of Regional Accrediting Commissions.

14 Thank you and welcome. Thank you for joining

15 us this morning.

16 Let me give you one more reminder

17 from yesterday, those of you who remember,

18 remember to press your mic to speak, and

19 remember that there are the posture police.

20 Just simply sit upright and speak naturally

21 into the machine. You don't need to lean

22 forward.

1 Okay, thank you very much. Let's
2 start with the Specialized and Professional
3 Accreditors. We'll start from that corner,
4 and welcome for being here. Thank you.

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

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

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

20 Number two, student achievement is
21 best determined by institutions, programs, and
22 accreditors, in partnership with communities

1 of interest.

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

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

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

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

22 The Department though, has

1 continued to create new regulation through the
2 negotiated rulemaking process for student
3 loans, for teacher preparation, for gainful
4 employment, and for various program integrity
5 issues including state authorization.

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

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

21 Differential review processes
22 based on perceived potential cause for concern

1 could be problematic for our programmatic
2 members since it would appear that the judgment
3 of the program's success is made prior to the
4 peer review process.

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

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

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

21 There's a wide range of indicators
22 in information, qualitative and quantitative

1 data that can be used to provide evidence of
2 quality and student achievement.

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

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

19 The committee asked agencies
20 whether or not they have taken an adverse action
21 as an indication that the agency is holding
22 institutions and programs accountable.

1 Accreditors are at risk of incurring
2 potentially crippling legal expenses when they
3 take adverse actions.

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

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

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

21 As well, the accepted evidence for
22 compliance with regulations evolves, and

1 that's fine. Accreditors evolve in what they
2 accept as evidence of compliance equally.

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

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

16 Is this yet another requirement on
17 top of the regulations and guidelines imposed
18 by the Department? Is the plan to impose some
19 kind of bright-line indicators to make
20 determinations on the performance of
21 institutions and programs that are reviewed by
22 accreditors?

1 We affirm that measures of quality
2 and competency for entry-level practice in a
3 given profession is the responsibility of each
4 profession, the specialized and professional
5 accreditor, and the publics they serve, not the
6 Department, not this committee.

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

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

22 Many accreditors provide such

1 guidance and support so that programs do not get
2 into difficulty or even become accredited in
3 the first place. Thanks.

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

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

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

20 I also serve as the President of the
21 Middle States Commission on Higher Education.
22 We at CRAC thank you for the opportunity to

1 speak with you this morning as NACIQI
2 reconsiders the 2012 report, and additional
3 advice that you may wish to give to the
4 Secretary at this point in time.

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

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

16 CRAC provided comment during the
17 original drafting of the 2012 report, and we've
18 also provided written comment during the
19 current period. What we said in 2012 is still
20 relevant today, and so I'm going to give you
21 just a little bit of a precis of the general
22 summary comment that was given at that point in

1 time.

2 We continue to support several of
3 the ideas such as those dealing with improved
4 communication among the Triad, and the need to
5 improve data collection as utilization as it
6 relates to quality assurance.

7 However - there had to be a however,
8 didn't there B one overarching concern is that
9 the proposals taken together would represent a
10 significant expansion of current law regarding
11 program integrity.

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

18 The last two years in higher
19 education have not been easy ones, and they have
20 not been easy years for regional accrediting
21 agencies either. The pace of change in higher
22 education and in individual institutions seems

1 to ratchet up every single year.

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

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

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

20 Regional accreditors are also
21 actively trying to address criticism. The
22 move toward common language is an example of

1 this, as is the ongoing experimentation with
2 methods of transparency in process and
3 reporting.

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

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

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

20 Some of the substantive change
21 requests are for very simple things that may not
22 be at all directly related to educational

1 quality, such as a change of address for an
2 additional location that can be simply as close
3 as across the street or one building down the
4 street. That does seem to be above and beyond
5 what we should be asked to do.

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

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

18 There have also been calls for more
19 flexibility in the accreditation process.
20 Terry Hartle mentioned that accreditors are
21 unsure what latitude we have, particularly as
22 related to recommendations nine and ten in the

1 NACIQI report. He's right about that, and we
2 do need greater clarity about what's allowable
3 and what's not.

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

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

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

20 Conversation over the past 24 hours
21 has also focused on the need to address some
22 really big-picture issues. One example is the

1 challenge that NACIQI accreditors and others in
2 the community should think more and more deeply
3 about the meaning of quality in higher
4 education.

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

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

21 Another big picture issue that has
22 more urgency now than it did two years ago

1 relates to the place of big data in what we do.

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

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

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

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

21 A set of metrics alone can't assure
22 quality in higher education, another point that

1 I think the Deputy Undersecretary made very
2 well yesterday.

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

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

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

21 And I think with that, I'm going to
22 call a halt, and perhaps now it's time for some

1 Q&A.

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

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

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

18 The question I have is what's the
19 possibility of coordination between the
20 specialized accreditors and the institutional
21 accreditors, to where I have maybe, instead of
22 one visit a week or a month, you know, one a

1 couple - you know, a couple of my programmatic
2 joining in my regional accrediting visit to
3 focus on the institution as a whole, yet at the
4 same time focusing in on the programs, which I
5 think would enhance the process for both
6 specialized and institutional accreditors
7 seeing it in total?

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

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

22 It ended up being what that

1 institution described to us as being the sort
2 of experience they would never want to repeat
3 again: too many people on campus at the same
4 time, too many complex requests for additional
5 information, too many conflicting ideas and
6 issues with where people needed to be and what
7 they needed to be doing.

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

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

21 At the end of the day, the question
22 raised from the Department, and it was an

1 interesting one to think about, is whether the
2 members of the team who represented the other
3 accreditor knew your standards well enough to
4 pass a judgment on whether the institution was
5 meeting both sets of standards.

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

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

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

17 I think the opportunity expressed
18 in the report to be a convening body to have
19 discussions and conversations about things
20 like eliminating duplicative requests for
21 information, and looking at where it's possible
22 in statute and regulation to allow the

1 different kinds of accreditors to work more
2 closely together and rely on each other's
3 judgment is definitely an area for exploration.

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

18 CHAIR PHILLIPS: I have Frank,
19 Bobby and Arthur.

20 DR. WU: So, to some extent, your
21 agencies are a means to an end. What I mean by
22 that is our goal is to improve higher education.

1 You're the way that we try to do that. And so,
2 we regulate you in order for you in turn to do
3 that to the schools that you visit.

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

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

18 There is one example that I'm aware
19 of in terms of the competency-based programs
20 that are going on. And apparently, the law
21 states that it's going to be 100 percent
22 competency-based. There can be no blending

1 involved if the program is going to be eligible
2 for the Title IV funding.

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

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

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

22 In terms of flexibility, it's more

1 than just what we've mentioned so far from this
2 side of the table. It's also issues like what
3 we might be able to do with changing the rate
4 at which we revisit institutions, the type of
5 reviews that we might do with different kinds
6 of institutions.

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

15 DR. WU: So, if I may follow up with
16 two more questions, would the following
17 statement be one that you think is true and
18 useful to make, that the accrediting
19 authorities feel constrained by the Department
20 and NACIQI, and that you feel that you are doing
21 things that aren't useful, or being prevented
22 from doing things that would be useful?

1 Does that capture the sentiment
2 that the Department and NACIQI are causing you
3 to behave in ways that are not productive for
4 society and for higher ed? That's the first
5 question.

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

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

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

1 future.

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

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

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

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

22 CHAIR PHILLIPS: I've got Bobby and

1 Arthur. Microphone please.

2 DR. DERLIN: Sorry, this is Bobby.
3 Yesterday we heard some varying impressions
4 about the degree to which accreditors reflect
5 appropriate review of student achievement, and
6 student performance, and student learning
7 outcomes in their standards, and in their
8 reviews.

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

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

21 I can't say 100 percent, but the
22 majority of them definitely that's how their

1 standards are based because the ultimate goal
2 is to have a graduate of a program that can go
3 into society and work in a profession
4 competently, safely.

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

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

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

21 I think one of the statements made
22 in that report is that accreditation continues

1 to be one of the places most responsible for the
2 work that has been done in institutions with
3 regard to learning outcomes assessment. So,
4 that's sort of a general kind of a statement.

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

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

18 Right now, one of the debates, I
19 think, is what is it that we really ought to be
20 aiming for. Ten years ago, when we really
21 started to focus in on this, we were looking for
22 institutions to be able to tell us they at least

1 had plans for doing student learning outcomes
2 assessment.

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

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

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

22 DR. DERLIN: Thank you.

1 CHAIR PHILLIPS: Thank you very
2 much. Arthur?

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

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

18 MR. VIBERT: I don't know that it's
19 necessarily doing a better job, because I think
20 accreditors are about the quality. There -
21 accreditors tend to hire more staff to meet the
22 requirements that are imposed on them. So, I

1 think accreditors will do a good job regardless
2 of whatever additional requirements are
3 imposed.

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

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

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

18 But, there are a lot of open
19 questions, I think, about what would happen in
20 a decoupling situation. Would institutions
21 continue to voluntarily work with regional
22 accreditors? I don't know the answer to that.

1 And there's a risk involved if that wasn't true.

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

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

14 MR. ROTHKOPF: This is a separate
15 question addressed to Middle States. At the
16 hearings we've had before we issued the 2012
17 report, one of the more graphic pieces of
18 testimony received was from Shirley Tilghman of
19 Princeton, and she talked about the
20 difficulties of their process, and the costs of
21 it, and what she felt was the inappropriateness
22 of it.

1 I'm not so much concerned about
2 responding to her point, but the point she made,
3 and AAU has made, and some of the other research
4 universities, is that really they are different
5 animals than some of the other schools you look
6 at, and they ought to be separated out into a
7 sector group that includes, maybe not just the
8 AAU members, but other maybe AAU would-bes, and
9 have an accrediting process for those kinds of
10 institutions.

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

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

20 DR. SIBOLSKI: So, let me first
21 make a comment about that set of hearings in
22 2012. I'm only going to speak for myself, but

1 I think it's true also for some of the other
2 regionals, it was a wake-up call, and a wake-up
3 call that we had not been adequately
4 communicating with some of the other
5 associations and with the different types of
6 institutions that comprise our membership.

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

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

16 Then, in terms of sector-based
17 accreditation, I said in my earlier remarks
18 that the idea that really is more intriguing to
19 me is risk-based, and that if we could figure
20 out what those risks are, and apply them
21 evenhandedly, you could still then use the same
22 set of standards for all of our institutions

1 that are accredited by each agency, but apply
2 them in slightly different ways based on
3 history and prospects for the future. So,
4 that's kind of where I'd like to see the
5 discussion go on that one.

6 MR. ROTHKOPF: Thank you.

7 CHAIR PHILLIPS: I have George and
8 John.

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

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

20 And the second question could be for
21 either of you following up on yesterday's
22 conversation about the administrative - the

1 administration's proposed score card. Are you
2 all involved in that conversation? Have you
3 been invited to the table to get your
4 perspectives on that proposal?

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

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

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

20 I would hope that we begin to do some
21 of those kinds of things, but certainly CRAC has
22 been working on a few other issues like the

1 common language and the statement that we
2 worked out with AAU.

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

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

16 MR. VIBERT: We weren't
17 necessarily invited to the table to talk about
18 the ratings system, but there was an
19 opportunity to provide commentary. And our
20 membership are very uncomfortable with the idea
21 of a ratings system, at least based on how it
22 was originally presented.

1 There is such a diversity among the
2 professions, and a diversity in how long it
3 takes to get a degree, the reasons that people
4 choose to go to school. So, things like
5 graduation rates may or may not mean something.

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

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

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

1 comments.

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

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

21 If there's all of that out there,
22 how does a consumer, how do families know where

1 to go? And certainly with all of that out
2 there, the potential for conflicting
3 information is pretty high.

4 CHAIR PHILLIPS: Thank you. John?

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

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

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

18 And I'm wondering if there is a need
19 for something like intermediate sanctions,
20 because it is so hard to yank accreditation from
21 an institution, just like it's hard for NACIQI
22 to yank recognition from an accreditation

1 organization. It's such a major step and can
2 be so devastating for the institution, for
3 students, and so forth and so on.

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

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

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

20 So, the suggestion was that we
21 create tiers of eligibility for financial aid
22 so that it is not necessarily just yanking --

1 all of a sudden yanking access to Title IV
2 funding, but perhaps putting some more of the
3 risk on an institution that is problematic, or
4 to a new institution.

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

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

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

21 But, I guess what occurs to me as
22 you're asking the question is that it would only

1 be possible to do that under a situation where
2 the accreditors and the Department were working
3 hand in hand, I think, where there would be
4 reliance on the accreditor to make some
5 judgments about the quality standards, and then
6 the Department's work on financial capability
7 of the institution probably would also have to
8 come into play.

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

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

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

22 DR. SIBOLSKI: Well, I think

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

11 CHAIR PHILLIPS: Bobby? Thank
12 you. Mic please.

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

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

1 institutions.

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

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

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

22 DR. SIBOLSKI: I'd be glad to.

1 You're right, that we are trying to change and
2 improve our processes as we move along.

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

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

18 So, yes, we recognize that the whole
19 process of self-study is pretty darn expensive.
20 It has to involve opportunity costs for the
21 institution too, because of the amount of time
22 that needs to be put into these things.

1 But, if you can allow an institution
2 to pick topics that will help it move forward,
3 then we've had very good success with
4 institutions feeling as though that process has
5 actually been useful to the institution moving
6 forward.

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

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

19 And a lot of our members are looking
20 at an electronic data submission, looking at
21 improving consistency, and also making the
22 lives easier of the programs participating in

1 the review process, things like looking at the
2 size of the site team and making sure that
3 that's efficiently chosen, and reducing costs
4 as possible -- as much as possible to the
5 receiving programs.

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

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

18 DR. SIBOLSKI: I'm going to speak
19 from the Middle States' point of view again.
20 And in the case of the review that John was
21 mentioning just a minute ago, the institution
22 had requested that we deal with the compliance

1 issues of what we would normally do in a
2 separate process, and that we would look at
3 compliance with all 14 of our standards ahead
4 of time so that the focused review could then
5 be about the topic that the institution felt
6 would be of benefit to it, and that would
7 demonstrate the kind of quality that exists in
8 the institution, and that would allow the
9 institution to ask questions of itself that
10 would further the development of quality in
11 that particular area. Is that kind of getting
12 at what you were thinking about?

13 CHAIR PHILLIPS: Yes, thank you.
14 Other committee questions? Anything else
15 before we move on? Okay, thank you very much
16 for joining us. We very much appreciate your
17 perspectives and preparation.

18 **THIRD PARTY COMMENT:**

19 I believe we have one, just one
20 public commenter today, and that is Bernie
21 Fryshman. We invite you to join us at the
22 table. Greetings, and welcome.

1 DR. FRYSHMAN: Thank you. I
2 thought that I would be adding some unique
3 perspective, and then I listened to Elizabeth
4 and Joseph, and I said, "Me too," to a lot of
5 the areas.

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

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

19 Recommendation five speaks about
20 drawing the convenient capacity and function at
21 the federal level to develop methods for Triad
22 articulation and, "promote greater engagement

1 and consistency across states."

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

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

17 Recommendation number six speaks
18 about evaluating whether the diversity of state
19 regulation across the country might be shaped
20 to incorporate recognition and so forth. My
21 comment is that the diversity of state
22 regulation is consistent with a healthy

1 regulatory environment.

2 Each state is the best judge of its
3 educational needs, and the guidelines under
4 which institutions should function. We should
5 protect this diversity.

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

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

20 You've said some of that, but I'm
21 afraid that you've heard many, many examples of
22 graduation rates, and career outcomes, and

1 jobs, and income. That has nothing to do with
2 learning. That has to do with career. That
3 has to do with life.

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

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

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

19 I would just remind you, I certainly
20 could remind myself, that the courses, the
21 majors that you were all engaged in, that we
22 were all engaged in, in high school, probably

1 has very little to do with what we're doing now.

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

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

9 (Bell chimes)

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

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

22 Those are the things that we talked

1 about that used to be integral to the entire
2 program, the entire process of recognition.
3 Recognition wasn't a challenge. It wasn't --
4 it was an invitation to show what we're doing.

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

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

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

16 DR. FRYSHMAN: Okay.

17 CHAIR PHILLIPS: Thank you.

18 DR. FRYSHMAN: The gathering of
19 data has become an end in itself. It's a burden
20 that produces very little policy, if anything,
21 very little contribution to teaching and
22 learning. You can't show me anything that's

1 come out of -- concrete that's in use anywhere
2 after 30 years of gathering data.

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

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

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

21 There has to be demonstration.
22 There has to be some indication that the

1 gathering of data makes sense, does something.
2 And if not, why the burden? Why the diversion?
3 Why the effort?

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

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

11 DR. FRYSHMAN: Convinced
12 everybody, did I?

13 (Laughter)

14 CHAIR PHILLIPS: Thank you very
15 much for your comments.

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COMMITTEE DISCUSSION

22

CHAIR PHILLIPS: So, committee,

1 you've heard -- you've had some briefings on the
2 current state of higher education.

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

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

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

19 The first category, this will sound
20 familiar, is what is it that you think needs,
21 from our 2012 report, that needs revising,
22 clarifying, simplifying, or updating?

1 The second is what areas were not in
2 that, that need addressing now? And the third
3 is what are the areas of NACIQI's role and
4 function that could be better -- could better
5 serve the goal of quality assurance?

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

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

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

22 (Whereupon, the above-entitled

1 matter went off the record at 9:50 a.m. and
2 resumed at 10:17 a.m.)

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

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

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

21 DR. DERBY: Well, it's not a
22 question, it's a comment -

1 CHAIR PHILLIPS: Okay.

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

4 CHAIR PHILLIPS: Hold on. So,
5 we're going to take -- I'm going to take them
6 up in the sequence. The first is the what do
7 we need to revise, clarify, simplify or update
8 about the 2012? Which, of course, you have
9 multiple copies of, one in your blue folder.

10 We'll start with that one and see
11 where that gets us. We'll take up the next one,
12 and then take up the last one, see where we are
13 as a group. Who knows? We may -- this might
14 be very quick and very clear, or it might not.

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

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

21 CHAIR PHILLIPS: The last one,
22 okay. In which case, Bill, you're first.

1 DR. PEPICELLO: All right, thank
2 you very much. My comments go to probably
3 structure as much as substance in looking at any
4 kind of revision, and that is that our original
5 report presents itself sort of in silos. You
6 know, there are the several areas that we said
7 we would look at.

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

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

17 And certainly what Art Keiser
18 brought up this morning as far as having to
19 suffer the slings and arrows of many reviews has
20 to do with the fact that many of the agencies
21 -- I'm just going to guess at this, Art -- that
22 come to visit you, define various areas

1 differently, assessment, for instance, being
2 one.

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

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

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

20 But, I don't think that the accuracy
21 of data collection can be addressed unless
22 there is some agreed upon set of definitions of

1 what the data is, so that if we collect it for
2 one purpose, it's in a database that then will
3 serve multiple purposes.

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

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

16 CHAIR PHILLIPS: Thank you.
17 Others?

18 VICE CHAIR KEISER: I think you're
19 absolutely correct. And one of the challenges
20 we have, not only the nomenclature among
21 accreditors, but among states, just the
22 definition of a degree.

1 Something as basic as, "What is an
2 associate degree?" there are so many
3 variations, and which inhibit student
4 transfer, which inhibit a lot of, I think,
5 coordination, especially in today's student
6 environment where students are moving from
7 institution, to institution, to institution.

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

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

20 And by the end of the 10-year cycle
21 in your regional accreditor, you've already
22 changed nine different times because of the,

1 you know, the different input, and I'm not sure
2 you'd know, even coming together with a stew
3 that might not really taste that good.

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

11 CHAIR PHILLIPS: Rick O'Donnell?

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

20 And then one recommendation
21 suggested we should undertake -- someone should
22 undertake a substantial modification to the

1 existing statutory and regulatory criteria and
2 their application to make them more possible,
3 less intrusive, prescriptive, costly, and
4 granular.

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

15 Because I'm not sure who we are
16 expecting to recommend the modifications to
17 statutory or regulatory criteria. I guess the
18 Department will do that. Members of Congress
19 might do that. But, why doesn't NACIQI do
20 that? Because we heard over the last two days
21 a lot of places where things could be less
22 intrusive and prescriptive.

1 And that's really getting down into
2 the weeds, but I think as Judith Eaton said,
3 there are few bodies in the country that are in
4 the weeds as much as we are.

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

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

16 CHAIR PHILLIPS: Thank you. John?

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

22 And, you know, let's go back to the

1 beginning and do an exercise in deciding if we
2 were to build an accreditation system now, and
3 -- to perform this function, what are the
4 regulations that would be absolutely essential
5 for us to -- the standards?

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

12 CHAIR PHILLIPS: Thank you. Anne
13 and Arthur?

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

21 And I think the alternative last
22 time around, essentially, was trying to look at

1 it rather than just simply tweaking around the
2 edges. And what I heard again from the folks
3 yesterday is that looking at the majority
4 report, that it was going to be more burdensome,
5 more regulatory, more enhanced requirements.

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

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

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

21 I would like to know more as to why
22 that financial responsibility overview is not

1 working, that is not effective, and how that
2 could be improved, because I think that would
3 be very, very helpful.

4 CHAIR PHILLIPS: Thank you.
5 Arthur?

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

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

20 It's a complicated question. But,
21 I think we could make some contribution in that
22 direction, and urge that there be regulatory or

1 statutory authority to do that.

2 CHAIR PHILLIPS: Frank?

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

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

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

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

1 share that view.

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

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

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

21 I wanted to mention though, and this
22 is mentioned in the 2012 report when there's

1 some discussion of what is NACIQI as an advisory
2 body, that it seems to me there's a whole other
3 set of issues where we actually might be better
4 able to get consensus, which are all about
5 process.

6 For example, how do we, as a body,
7 do our work? You know, I sense sometimes,
8 regardless of our views or who appointed us,
9 some frustration around the table at why is it
10 that two dozen of us have flown from all over
11 the country to spend two days in a conference
12 room engaged in the exercise we're engaged in?

13 Is it actually meaningfully related
14 to the quality of higher education in some way?
15 And if it's not, all of us have other things we
16 could be doing.

17 So, I wonder if we could think about
18 the process. How do we do this work? How do
19 we relate to the staff? How does the staff do
20 its work? Because a big piece of what I heard
21 was not about the substance, but about how staff
22 engages in back and forth. And I

1 think our staff is great. I admire the staff.
2 They're doing what they've been directed to do.
3 But, I wonder if the back and forth about
4 documents, for example, because so many of
5 these cases come to us where it's a puzzle
6 whether there's actually a real problem, or
7 whether there's just been a lack of
8 communication and documentation.

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

16 CHAIR PHILLIPS: Art?

17 VICE CHAIR KEISER: I think we're
18 moving to the third issue, which is a good
19 issue. But, just to stay in Frank's
20 discussion, I think we also need to look at our
21 relationship with the Department, in that we
22 make a recommendation and it's ignored, or

1 it's, you know.

2 I think the question is why we're
3 here, which the -- I think I've heard that three
4 or four times since we've been here in this
5 meeting, more than I have in the past.

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

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

20 DR. WU: May I ask Art a question?
21 From everything I've read, my understanding is
22 that the old version of us had more power, that

1 is, it actually decided. Do I have that right?
2 Because Art, you were on the old version, and
3 --

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

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

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

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

22 I think in my tenure with the

1 Department, what I see is more involvement by
2 NACIQI in this other aspect of your functions
3 and your authority in the policy advisement
4 part of it.

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

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

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

19 And it was made most clear during
20 the last reauthorization on the Department's
21 side to try to reinforce and emphasize more
22 clearly that the staff is Department staff, and

1 the Department sends a recommendation through.
2 That has never changed, that was.

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

11 CHAIR PHILLIPS: I have Jill and
12 Arthur.

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

21 But, it struck me that we have here
22 a collection of very smart people who know

1 higher education and understand accreditation
2 well. And to some degree, the role we play in
3 the recognition process is valuable, but it
4 seems very staff-driven.

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

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

18 It seems as though we haven't really
19 played into that other than the 2012
20 recommendation. And I realize this is a newly
21 constituted, still fairly newly constituted
22 body that is finding its way and trying to see

1 how we can make the biggest difference with some
2 of the really important issues that are facing
3 higher education.

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

9 CHAIR PHILLIPS: Arthur?

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

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

19 Let me throw out something, which is
20 probably not what we should do, but there's an
21 argument for it. And that is with the
22 restructuring of NACIQI and the fact that 12 of

1 us have been appointed by the Congress, why
2 don't we, rather than just issue our reports or
3 advice to the Secretary, why don't we take the
4 position that we are also advisory to the
5 Congress?

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

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

20 DR. WILLIAMS: Carolyn Williams.
21 I concur with much of what's been said. I, too,
22 would like to see us move more into the policy

1 realm. I think we spend an awful lot of time
2 going through fairly routine and a very
3 comfortable process as we listen to the reviews
4 and we move in that direction.

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

10 CHAIR PHILLIPS: I have John and
11 George.

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

21 And they don't always sit together
22 well. Think, for example, accreditation

1 organizations have a bunch of requirements, and
2 some of them have to do with what they think is
3 good practices for improving your quality,
4 which is something that every institution
5 should be doing whether -- no matter how good
6 they are.

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

16 Well, they certainly shouldn't have
17 their Title IV eligibility taken away because
18 they're doing a great job. They just don't see
19 this other thing as important to them. And I
20 have actually seen institutions where that
21 seemed the case, outstanding institutions that
22 just did not want to enter into the game of

1 direct learning assessment, for example, just
2 to use an example that came up yesterday.

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

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

18 And I'll tell you, the best
19 indication of how bad a higher education system
20 is, is how intrusive the ministry of higher
21 education is. I mean, you have a ministry of
22 higher education and you know right away that

1 that country's not going to have great
2 universities, frankly.

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

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

16 And you could imagine then an
17 accreditation -- and leave it with the
18 accreditation organization and say, "We want
19 you to do two things. You do what you've been
20 doing with accreditation, but we want you also
21 to give us a separate judgment on whether or not
22 the institution is Title IV eligible," separate

1 judgment.

2 You do it, so we're not taking that
3 out of your hands. But, it is not the same as
4 the judgment about accreditation. So, that
5 would be another way of delinking, and it would
6 be a way of delinking that didn't do the, what
7 I see as the rather dangerous, move of moving
8 the eligibility into a central, federal agency.
9 That's all.

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

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

18 I think that's where I have my
19 consideration. I think the 2012 report gave a
20 lot of concentration in the accreditation
21 recognition area. I don't think that I see in
22 the report, however, what we're discussing now,

1 the policy advisement role, enough.

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

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

12 CHAIR PHILLIPS: Thank you.
13 Bobby?

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

20 And I would suggest, based on other
21 conversation that's been occurring, that a
22 role, if you will, in the matrix might be this

1 issue of procedures, and process, and a
2 detailed examination of the criteria.

3 And a different role might be the
4 roles for NACIQI, which I think would allow us
5 to really articulate more carefully our
6 interaction with policy and broader issues than
7 just, "Is it 25 criteria, or is it 95? And is
8 25 even too many? And do we have enough
9 substance or not?"

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

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

22 I think there's more than -- I think

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

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

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

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

22 CHAIR PHILLIPS: Thank you.

1 Others? Art?

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

9 And if you follow that specific issue, to
10 me, it throws a tremendous scare into the whole
11 viability of accreditation and linkage, in
12 which an independent accrediting body -- and
13 again, it depends on your political persuasion
14 whether you thought it was thoughtfully -- made
15 a thoughtful decision to remove the
16 accreditation after multiple review processes
17 -- and the subsequent political involvement,
18 both from a Department level, and from a
19 political level, from a -- you know, from Nancy
20 Pelosi, you know, the Unions, the lawsuits,
21 really undermined the authority of the
22 accreditation process.

1 And I think it sends tremendously
2 bad signals to the accrediting community that
3 if they take a, kind of the "too big to fail"
4 school on, which is consistent and fair with the
5 processes that we are asked, again, to follow,
6 they could have serious political and legal
7 challenges that could threaten the viability of
8 that agency.

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

20 So, I think that's something we need
21 to consider going forward, and in a
22 recommendation.

1 And I'm not sure I know the answer,
2 because it is -- it was so -- I mean, just
3 reading the literature, you know, again, I
4 don't know how much of it was press bias or press
5 sensationalism, but I wouldn't have wanted to
6 be on the WASC Commission during that process.
7 It was pretty nasty.

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

13 CHAIR PHILLIPS: Thank you. Jill?

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

20 One of our panelists, and I don't
21 remember which it was, spoke passionately about
22 not delinking because -- for the reason he said,

1 that it would detract from an institution's
2 incentive really, and somehow maybe undermine
3 the whole accreditation and quality efforts,
4 because the focus would be much more on Title
5 IV eligibility.

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

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

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

20 So, the linkage issue is to try to
21 take that gatekeeping function, that is what is
22 the door to open up the Title IV spigot. It's

1 much more complex than that. It's not as
2 simple as just getting accredited.

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

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

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

18 MS. NEAL: It gets back to really
19 accreditors essentially being federal actors
20 when they are Title IV gatekeepers. And they
21 started out as peer review voluntary bodies,
22 which provided excellent insight on

1 educational quality.

2 And then once you give them the
3 gatekeeping role, they do become federal actors
4 and enforcers. And I think, as Arthur said,
5 those two roles create the tension and the
6 problems that I think we heard about.

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

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

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

22 DR. ETCHEMENDY: Well, under the

1 new areas, let me just mention what - something
2 that I said earlier, which is I think this idea
3 of differential access to aid somehow or other
4 thought through, whether that's, you know, in
5 a reimbursement only model, or, you know,
6 something that shares the risk, the loan
7 repayment risk between the institution and the
8 federal government.

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

15 CHAIR PHILLIPS: Bobby?

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

20 I also think part of the thought
21 about delinkage has to do with this voluntary
22 membership on the part of institutions and

1 accreditation associations, and perhaps
2 over-familiarity among folks who participate
3 in peer review, and there's some issues about
4 that.

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

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

17 CHAIR PHILLIPS: Rick?

18 MR. O'DONNELL: I'd just echo both
19 of these comments. I think sometimes the
20 federal government's, in my judgment,
21 legitimate concern about how tens of billions
22 of dollars gets spent, accreditation seems to

1 be - accreditors need to solve that problem, and
2 institutions need to solve that problem, but it
3 actually may be, you know, underlying problems
4 within the statute with how loans are given, and
5 that they are, in essence, an entitlement with
6 no real responsibility on the part of the
7 individual receiving them or the institution.

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

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

19 CHAIR PHILLIPS: Thank you. Bill?

20 DR. PEPICELLO: Yeah, I would agree
21 with those comments that were made. I think
22 it's - it might be worthwhile, although, again,

1 more imposition on our time, to actually look
2 at, and maybe blue sky, some zero-based models.

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

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

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

18 Because we've had some discussions
19 here over the years where we got an issue on the
20 table, and we discussed it and said, "Oh,
21 nevermind. We don't want to do that." So, I
22 think those are ideas that are worth pursuing.

1 CHAIR PHILLIPS: So, let me just
2 give a snapshot of what I think I've heard so
3 far. And let me first say I hear a fair amount
4 of commonality in what is being said, certainly
5 on the level of detail and interest in
6 advocating for common definitions.

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

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

21 The fourth - the third thing that I
22 hear is the connection between aid compliance

1 and quality assurance. Sometimes that's
2 called linkage. Sometimes it is called
3 accreditors should not be compliance
4 enforcers, so, something about the
5 relationship between the actors and the money.

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

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

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

20 While that is half of our charter,
21 as we were reminded yesterday, I hear that
22 there's - that isn't - hasn't been experienced

1 as being a sufficient proportion of our time and
2 effort, so, a - certainly a message to us, and
3 perhaps also a recommendation to the Secretary
4 to use us more in that way.

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

12 VICE CHAIR KEISER: How broad do
13 you interpret that third one of quality and
14 money? Because that's pretty nuanced in terms
15 of whether - are you talking about the
16 gatekeeping function, or are you talking about
17 -

18 One of the things that really
19 impressed me was the issue of, you know, if
20 we're asking the accrediting commissions to be
21 gatekeepers, that we don't have their back when
22 it comes to the fact that they make decisions,

1 and the WASC is, to me, the biggest example of
2 that.

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

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

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

20 Another is thinking about how to -
21 whether - how to connect, or whether to connect
22 the notion of traditional academic quality and

1 access to financial aid. There's a lot of
2 ground in there. Jill, go ahead.

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

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

16 CHAIR PHILLIPS: Bobby?

17 DR. DERLIN: There's a piece of me
18 - and I don't think any report that we do should
19 not reference quality. But, there's a piece of
20 me that thinks the issues we're talking about
21 now might be better captured as talking about
22 federal financial aid relationships, or

1 enforcement relationships, or keeping it
2 tighter on just focusing on the financial aid
3 relationships, and actually dealing with
4 quality kinds of issues that we see, sort of
5 like its own row.

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

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

15 CHAIR PHILLIPS: Art?

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

22 Our side of it is the accreditation

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

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

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

20 But, you know, it's just only one
21 part of the whole role, and it's all tied to the
22 "institutional quality" of the institutional.

1 CHAIR PHILLIPS: Other
2 perspectives, clarifications on this
3 money/quality bucket that I might want to
4 clarify in that area?

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

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

22 So, I can imagine these four, again,

1 four areas, simplification, nuance, money and
2 quality, and policy role, being, sort of, the
3 four areas in which we would want to focus our
4 attention in developing recommendations,
5 whether they be recommendations to ourselves
6 for our own conduct of business, or
7 recommendation to the Secretary, or to
8 Congress, whoever we would like to advance
9 those recommendations to, as we think about the
10 Higher Education Reauthorization Act and how it
11 might shape our work going forward.

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

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

20 My suggestion then, at this point,
21 would be to take this then - If you'll recall,
22 back in January, I think, I probably asked for

1 people who might be interested in participating
2 in a smaller working group over the summer to
3 develop recommendations.

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

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

18 So, we see that as the next step.
19 We've defined our four areas for developing
20 ideas. Obviously, there's lots of stuff
21 underneath each of those to take on. None of
22 them are small ones, but would be taken on by,

1 perhaps, one smaller group, not necessarily the
2 whole committee, unless everybody decides
3 they're going to sign onto a subcommittee, in
4 which case, we'll work that out, and work over
5 the summer coming back with targeting September
6 to be an outcome date.

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

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

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

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

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

22 VICE CHAIR KEISER: Well, we have a

1 - I know, Frank, that was one of your big areas,
2 was the data, the data issue. And are we going
3 to drop that from our discussions?

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

7 VICE CHAIR KEISER: Right.

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

14 (Laughter)

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

17 CHAIR PHILLIPS: Yeah, yeah.

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

20 CHAIR PHILLIPS: Mic please.

21 DR. WU: Doesn't it just fit within
22 one of yours?

1 CHAIR PHILLIPS: All right, which
2 one would you put it in?

3 DR. WU: I'm not sure, but -
4 (Laughter)

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

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

9 CHAIR PHILLIPS: Commonality?

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

14 CHAIR PHILLIPS: Art?

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

22 CHAIR PHILLIPS: I agree. I

1 didn't hear it as a comment/concern across this
2 group as they were talking about what they
3 wanted to focus on next. Just - feel free to
4 disagree with me on this. Bobby?

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

10 DR. PEPICELLO: Yeah, I think also
11 that -

12 CHAIR PHILLIPS: Bill Pepicello.

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

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

21 MR. BOEHME: Simon. You know, I
22 just wanted to remind the body again that I

1 think that there are a whole slew of issues in
2 higher education right now, access,
3 affordability, and innovation. And, you know,
4 I don't have the answers for all of this.

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

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

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

20 And I think we just need to keep in
21 mind that there are millions of students who,
22 I think, are counting on this body to really

1 ensure that some issues such as access,
2 affordability, and innovation, encouraging the
3 institutions across the United States to do
4 better, and always do better.

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

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

16 DR. PEPICELLO: Oh, never.

17 (Laughter)

18 CHAIR PHILLIPS: Just thought I'd
19 mention it. So, as we think about the ultimate
20 purpose, which is to ensure quality, greater
21 quality in higher education, have we captured
22 our immediate task of developing

1 recommendations for the Secretary and whoever
2 else would like to listen, including
3 simplification, nuance, connection of quality
4 and money, and our role in policy and developing
5 policy.

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

12 MR. BOEHME: This is Simon. Would
13 the policy recommendation number eight from the
14 2012 report go under simplify? This is the,
15 "Encourage a dialogue within the accreditation
16 community about the structure and organization
17 of the accreditation enterprise."

18 CHAIR PHILLIPS: Sure.

19 MR. BOEHME: Thank you.

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

22 (Laughter)

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

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

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

10 CHAIR PHILLIPS: The operations
11 role.

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

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

17 CHAIR PHILLIPS: Jill?

18 DR. DERBY: I just want to follow up
19 on what Simon said, and what Bill said, because
20 I'm not clear about that connection.
21 Affordability - access and affordability are
22 huge issues in higher education, and I'm not

1 sure how what we've laid out here, unless it is
2 in category four, just general policy, I'm not
3 sure how that fits in under the other umbrellas.

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

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

22 DR. DERBY: My question was really

1 about access and affordability more than about
2 quality assurance. I think it is clearly very
3 focused on quality assurance.

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

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

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

21 CHAIR PHILLIPS: Arthur?

22 MR. ROTHKOPF: Yeah, one subject we

1 haven't talked about at all, and
2 understandably, because it hasn't yet
3 surfaced, but let's assume this report would be
4 - come out in December, or that would probably
5 be the earliest it could come out.

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

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

18 I can tell you what I think about it,
19 and I'm sure all of us have a view without
20 knowing all the facts. But, it's a big deal.
21 And, you know, Jamie couldn't really answer the
22 question of how it does relate to

1 accreditation. It's kind of a murky
2 relationship there.

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

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

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

17 (Laughter)

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

20 CHAIR PHILLIPS: My sense of that,
21 just to respond to the ratings system, my sense
22 about that is that there - this body will

1 certainly want to respond once it knows what to
2 - there's something to respond to.

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

7 (Laughter)

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

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

18 CHAIR PHILLIPS: I'd like to ask
19 the group to come back to the fifth area
20 question that Simon had raised about access and
21 affordability. If I were to characterize as
22 one - the one biggest thing that has happened

1 since 2012, it would be the worry about
2 affordability.

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

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

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

21 MS. NEAL: I think Simon said at one
22 point access and innovation, and I think those

1 two have to go together.

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

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

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

17 And I guess to be specific, I have
18 real concerns with the competency-based
19 education that's being pushed politically
20 because it's supposedly cheaper. But, it's -
21 we have to be careful that, you know, innovation
22 is good, and we want to encourage innovation,

1 but we also have to, you know, look at the long
2 term impacts of it.

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

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

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

19 You know, I think one of them we were
20 talking about earlier when we talked with the
21 women from CCNE, that the commissions can be
22 working together to lower costs for

1 institutions, which directly lowers costs for
2 students. I mean, that's how you do it.

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

6 CHAIR PHILLIPS: John?

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

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

19 It's at least independent, and
20 innovation is also independent from either of
21 those because on the one hand, my experience
22 with innovation at Stanford is that every

1 innovation just costs more money, you know.
2 None of it is cheaper, but that's because of
3 the, you know, the way we do it.

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

10 DR. PEPICELLO: Yeah, this is Bill.

11 CHAIR PHILLIPS: Thank you. Bill?

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

17 Students who most need help and
18 education, who do not advance quickly at their
19 own pace will gravitate towards a higher cost
20 model simply because they need more services
21 and support. And so, I think it's really
22 important that we look at that balance.

1 CHAIR PHILLIPS: Bobby?

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

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

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

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

22 CHAIR PHILLIPS: Simon?

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

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

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

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

22 CHAIR PHILLIPS: I'm going to -

1 actually, I'll wait for mine. Art and then
2 Frank.

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

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

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

17 CHAIR PHILLIPS: Frank?

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

22 If you asked a man or woman on the

1 street what does an accredited law school or
2 college, what is it? They would say, "Well,
3 that's a quality school." So, they would be
4 quite puzzled to learn that it's not
5 necessarily the legal and policy view that
6 these are linked.

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

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

19 Neither quality nor cost is ever
20 mentioned. And indeed, sometimes if it's
21 raised, we are reminded appropriately that
22 actually it may be beyond the scope of what

1 we're supposed to be doing.

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

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

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

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

22 And we're driven really by statute,

1 not even regulation. So, it's pretty specific
2 what our staff has to check off. And our job
3 is to evaluate, you know, the nuances,
4 supposedly, between the staff analysis and what
5 we understand from an educational perspective.

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

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

21 CHAIR PHILLIPS: Jill?

22 DR. DERBY: Well, I think Frank has

1 laid out exactly what it is we do, but help me
2 understand, because I had thought in the
3 statute we also are asked to advise the
4 Secretary.

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

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

12 DR. DERBY: Right.

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

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

22 DR. FRENCH: Madam Chair, I just

1 wanted to revisit something I just heard Jill
2 speak to, and Arthur earlier, and it has to do
3 with the question that I asked to the
4 accreditors earlier about their view on this
5 whole scorecard and ratings system.

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

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

18 Whereas the accrediting bodies have
19 been doing this for over 100 years, and we're
20 saying, "Well, we're going to allow the
21 coupling to remain in existence. The
22 accreditors, we have full confidence in their

1 abilities to make assessments of these colleges
2 and these universities."

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

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

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

19 I want to just toss something else
20 onto the table since we've taken our four
21 buckets and merged them. I want to just
22 reflect for a moment on the extent to which the

1 four of the major buckets that we've talked
2 about, simplification, nuance, money and
3 quality, and NACIQI role, are what I'll call
4 reactive.

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

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

18 If there was another thing that I
19 would say happened since 2012 to now, it would
20 be the expansion of the places and providers of
21 education that - I'm going to refrain from
22 calling it the MOOC effect, but you can think

1 of that as one example, as well as recognition
2 of other ways of accruing the benefits of
3 education other than the traditional
4 institutional venues.

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

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

21 What - there was some discussion in
22 the Kevin Carey/Ben Miller paper about

1 recognition of quality in other kinds of
2 providers and certificates. This is a venue of
3 education that we just - that is just completely
4 coming into the field now, and I wonder about
5 that.

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

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

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

1 it provides, and so forth, and so on.

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

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

12 CHAIR PHILLIPS: Bobby?

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

21 And so, maybe how the - maybe at our
22 comment language bucket, we think about what

1 our institutional - what are institutions in
2 our higher education system, in some way?

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

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

18 The connection of money and
19 quality, big bucket, with the connection
20 between aid, eligibility, and quality
21 assurance, and also differential -
22 possibilities of differential access to aid,

1 and protection of accreditors.

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

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

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

22 So, those are - that's sort of where

1 we are so far. Jill, did you want to add
2 something?

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

8 CHAIR PHILLIPS: It's in number
9 three.

10 DR. DERBY: In number three?

11 CHAIR PHILLIPS: It's still on my
12 page.

13 DR. DERBY: It is?

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

20 Come up with a draft for NACIQI and
21 public comment to react to, revise, modify, and
22 come back to our December meeting with a

1 document that's prepared for a more thorough
2 debate and adoption.

3 Plan going forward okay? Sound
4 okay for you?

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

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

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

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

1 Rick, yes?

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

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

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

16 CHAIR PHILLIPS: Yeah. In
17 addition to the turnover of the committee, just
18 to be - to give some context, when we worked
19 through this process in 2010, '11, and
20 ultimately it was finished in '12, all of us
21 were on the committee for that whole time, so
22 we didn't have member turnover at the time.

1 We'd just been reconstituted as a
2 body. So, the issue of having turnover in the
3 middle of a policy development process is a
4 whole new game.

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

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

17 It's likely to, if I go back to my
18 notes on what things happened in our prior
19 policy meetings, much of the conversation
20 happens in a conference call medium. So, even
21 if you are on Martha's Vineyard, we can find
22 you.

1 So, I'm hoping to get that out first
2 of the week next week, and invite your response
3 pretty quickly so we can get work groups
4 together.

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

9 VICE CHAIR KEISER: So moved.

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

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