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U.S. DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL
QUALITY AND INTEGRITY

(NACIQI)

June 24, 2016

DOUBLE TREE BY HILTON HOTEL

WASHINGTON BALLROOM

WASHINGTON, D.C. - CRYSTAL CITY

300 ARMY NAVY DRIVE

ARLINGTON, VA 22203

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1 PROCEEDINGS

2 (8:31 a.m.)

3 MS. PHILLIPS: Good morning and welcome to the third day of the June
4 meeting of the National Advisory Committee on Institutional Quality and Integrity. I'm
5 Susan Phillips, Chair of the Committee. I want to start out this morning before we do
6 introductions with a couple of -- actually after we do introductions with a couple of quick
7 announcements about the order of business today and going forward.

8 So for this round of introductions I think I will start with Bobbie and if
9 you could just mention your name and affiliation if any.

10 MS. DERLIN: Bobbie Derlin, Associate Provost Emeritus, New Mexico
11 State University.

12 MR. ZARAGOZA: Federico Zaragoza, Vice-Chancellor of Economic and
13 Workforce Development, Alamo Colleges.

14 MR. BROWN: Hank Brown.

15 MR. WOLFF: Ralph Wolff.

16 MR. STAPLES: Cam Staples.

17 MS. MANGOLD: Donna Mangold.

18 MS. MORGAN: Sally Morgan.

19 MR. ROTHKOPF: Arthur Rothkopf.

20 MR. KEISER: Arthur Keiser, Chancellor at Keiser University.

21 MS. HONG: Jennifer Hong.

22 MR. BOUNDS: Herman Bounds.

1 MR. WU: Frank Wu, Profession University of California, Hastings
2 College of Law.

3 MR. O'DONNELL: Rick O'Donnell, Skills Fund.

4 MS. NEAL: Anne Neal.

5 MR. LEBLANC: Paul LeBlanc, Southern New Hampshire University.

6 MS. PHILLIPS: Thank you all and welcome back. Today we have a bit
7 of an adjustment in our schedule. I wanted to just give a recap of where we left off at and
8 where we will be going today. First up we will be taking up the health group ABHES.
9 Second, the ATS group, third -- the veterinary group -- we expect to be losing a quorum
10 in the middle of the day so if we have time we will also then go to Northwest and to
11 AVMA and COE.

12 We do not expect to be able to get to the Osteo group COE Tracks or
13 ACCSC and have scheduled those for a telephonic meeting. I will ask Jen to describe the
14 way we are going to accomplish a telephonic meeting.

15 MS. HONG: We'll announce it at a later date through the Federal
16 Register notice and the NACIQI website so we will keep those agencies informed as well
17 as the public about the date and further directions on how to access that meeting.

18 MS. PHILLIPS: You also will see in your folders our plans for a
19 December date for the meeting. I believe we have it set so far as December 8 and 9 so if
20 you can do a "Save the Date" on your calendars for those of you who will be returning.

21 With that in mind I wanted to give a special recognition and thanks to the
22 members who have been appointed by the Senate with terms expiring in September of

1 2016. We know that some of you may be back and re-appointed but for now we very
2 much appreciated the service of Hank Brown, Jill Derby, Paul LeBlanc, Anne Neal, Rick
3 O'Donnell and Cam Staples, we thank you for your service and hope this isn't the last
4 time that we see you.

5 One final bit of housekeeping again with the core issue in mind -- as you
6 all know we planned a pilot project for this meeting that included the inclusion of four
7 groups of questions. As it turns out I think we have had the opportunity to partially pilot
8 that plan and in some cases it has been challenging to put that into focus.

9 I am going to suggest that we consider a Motion to extend the pilot
10 through the December meeting at which point we would be able to then have a more
11 fulsome discussion about what we wanted to do with it going beyond December. I don't
12 think that we will have that opportunity today.

13 So if that is a reasonable suggestion then I would entertain a Motion to do
14 so.

15 UNIDENTIFIED SPEAKER: So moved.

16 MS. PHILLIPS: Thank you a second? Those in favor aye, opposed,
17 abstentions okay we will continue to do that. So, moving on to the business today any
18 other initial announcements, housekeeping, anything that I need to be mindful of -- yes?

19 MR. KEISER: Just a question -- if and when we lose our quorum is that
20 going to be the end of the meeting?

21 MS. PHILLIPS: Yes it will. Okay so we continue with the second part of
22 our review agenda which we have renewal applications with the pilot project questions.

1 The procedures again for this process includes introduction by the Primary Readers of the
2 Agency application, a presentation by the staff for a briefing. The Primary Readers --
3 questions of the Agency including the pilot questions -- other questions by NACIQI
4 members, any third party comments that may be their opportunity for the Agency to
5 respond to the third party comments, opportunity for the staff to respond to the Agency
6 and the third party comments and finally our discussion, Motion and vote.

7 And then the last final set of pilot project questions. Again I will be
8 monitoring us as we go along to keep us on time and on task and with that in mind our
9 first Agency on the agenda today is the Accrediting Bureau of Health Education Schools
10 Renewal of Recognition. The Primary Readers for this Agency are Simon Boehme and
11 Anne Neal, Department staff is Valerie Lefor. With that in mind not seeing Simon and I
12 am going to ask Anne to introduce the Agency, thank you.

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1 **ACCREDITING BUREAU OF HEALTH EDUCATION SCHOOLS (ABHES)**

2 MS. NEAL: The Accrediting Bureau of Health Education Schools is a national
3 institutional and programmatic accreditor. It's current scope of recognition is the
4 accreditation of private post-secondary institutions in the U.S. often predominantly allied
5 health education programs and the programmatic accreditation of medial assistant and
6 medical laboratory technician and surgical technology programs leading to a certificate
7 diploma Associate of Applied Science, Associate of Occupational Science, Academic
8 Associate Degree or Baccalaureate Degree including those offered via distance
9 education.

10 ABHES accredits 243 institutions and 166 programs. The Secretary's
11 recognition enables its institutions to seek eligibility to participate in student financial
12 assistance programs administered by DOE under Title 4. It seeks renewal today.

13 MS. PHILLIPS: Thank you and before the staff report I just want to make
14 an apology I didn't call for recusals but there was a recusal and that is Art Keiser, Valerie
15 go ahead.

16 MS. LEFOR: Good morning Madame Chair and members of the
17 Committee. For the record my name is Valerie Lefor and I will now be presenting a
18 summary of the Petition for Continued Recognition submitted by the Accrediting Bureau
19 of Health Education Schools referred to as ABHES or the Agency.

20 The staff recommendation to the senior Department official for the
21 Agency is to renew the Agency's recognition for a period of 5 years. Based on review of
22 the information and the Agency's Petition and observation of the site visit in March, 2016

1 Department staff found that ABHES is in compliance with the Secretary's criteria for
2 recognition with no issues or concerns.

3 The Department did not receive any written third party comments and has
4 received one complaint during this review cycle regarding the Agency. However, the
5 Agency was not placed on the Consent Agenda for this meeting in order to discuss the
6 information requested under the Committee's pilot project.

7 Therefore, the staff recommendation again is to the senior Department
8 official for the Agency to renew it for a period of 5 years. Representatives are here from
9 the Agency and I am happy to answer any questions that you may have. This concludes
10 my report, thank you.

11 MS. PHILLIPS: Thank you, Reader questions for Staff at this point?

12 MS. NEAL: Can you tell us about the complaint please.

13 MS. LEFOR: Yes it was a complaint from an institution that had been
14 denied accreditation and they had concerns that they were not given due process. We
15 looked into it and we found that the Agency had followed all of the Secretary's criteria
16 for recognition and it was resolved.

17 MS. PHILLIPS: Any Committee questions for staff at this point? Thank
18 you we will invite the representatives of the Agency to join us. Thank you for being with
19 us.

20 MR. YENA: Good morning I'm Jack Yena, Chair of the ABHES
21 Accrediting Commission and with me today is Florence Tate our Executive Director and

1 Amy Rowe our Director of Institutional Review and Development. We appreciate the
2 opportunity to appear today.

3 Our experience with the Petition was a very positive one obviously. We
4 like your recommendation. I sat in your seat for two terms as a member of the NACIQI
5 Board. Consequently I have a great deal of respect for the process and the time that you
6 all have invested.

7 Yesterday was a bear of a day with respect to time and I understand the
8 importance of the work of this Committee for having participated in it. The Petition was
9 treated by our Agency much like a self-study that an institution goes through. It was a
10 very valuable exercise and that we treated it as a team project. It was certainly a team
11 effort and it was overseen by Amy Rowe the young lady to my right.

12 We are pleased with the Department's analysis. Valerie participated in the
13 visitation and she was available many times. When I sat yesterday and saw the volume
14 of work that you all had to deal with it's amazing that Valerie really was available to
15 determine bonds were accessible throughout the whole process and the whole process
16 was very affirming for us.

17 We are prepared to answer any questions that the Committee has
18 regarding our Petition.

19 MS. PHILLIPS: Thank you, thank you for your patience yesterday and
20 the day before and if you could introduce your two compatriots.

21 MR. YENA: I'm sorry I will now introduce our Executive Director
22 Florence Tate.

1 MS. TATE: Good morning and I also reiterate what Dr. Yena has said
2 that I thank you for the opportunity and I appreciate the staff's assistance in going
3 through this process but I also want to acknowledge my ABHES staff which is sitting
4 beside me and they have been here every single day patiently awaiting to sit here in front
5 of you as a team.

6 We have learned a lot about ourselves going through this process and each
7 of us will be responding to your questions as you bring them forward.

8 MS. PHILLIPS: And if you could introduce the third person who is with
9 you.

10 MS. TATE: Yes and we have my great Director of Institutional
11 Development Miss Amy Rowe. I call her Agent Amy.

12 MS. PHILLIPS: Thank you. Primary Readers, questions of the Agency
13 including the pilot questions?

14 MS. NEAL: Well good morning you certainly have had a lot of seat time
15 for the last few days haven't you?

16 MS. TATE: Yes.

17 MS. NEAL: Looking at your proposal it appears that there have been no
18 changes in your policies for the last five years. Given that you are working in a health
19 education field do you see a need to change any rules or do you perceive any necessity to
20 address what is happening in the general marketplace when it comes to health?

21 MS. TATE: The marketplace is changing drastically. I believe that
22 technology is impacting how doctors you know we used to have the doctor come to the

1 house and now everything is done by computer analysis. Our Agency meets consistently
2 with the practitioners in the field to find out what is happening in the field and how we
3 can improve our processes as it relates to our standards programmatically.

4 MS. NEAL: When will you be having that next systematic review?

5 MS. TATE: Are you asking about the systematic review of our standards?

6 MS. NEAL: Yes.

7 MS. TATE: Oh it's ongoing. We review our standards every single year
8 and we have a five year systematic process and those standards are -- we just finished in
9 fact the review and there is a call for comment that has gone out to the staff and to the
10 membership for a response.

11 MS. NEAL: And in the course of the time since we last saw you have you
12 closed down any schools or sanctioned any schools publically?

13 MS. TATE: Yes. I am going to let Amy give you our institutional
14 numbers as it relates to that.

15 MS. ROWE: We have denied 9 schools and withdrew 7.

16 MS. NEAL: Did you find that there was any particular pattern?

17 MS. ROWE: The areas that we have listed are that were I guess was a
18 pattern is placement, placement records, financial information, clinical experiences and
19 program activeness.

20 MS. NEAL: So that leads nicely into my next question. In terms of
21 placement what is your standard and how do you insure the accuracy of information you
22 receive?

1 MS. TATE: Our standard is 70%. That is the standard for retention, for
2 placement and for credentialing and we have had that standard I believe since 1994.

3 MS. NEAL: And one of our pilot questions is how did you determine that
4 that was your appropriate standard?

5 MS. TATE: I was waiting to give you this answer. In 1994 validity and
6 reliability was discussed by Karen Kershenstein and she discussed that in terms of linking
7 outcomes to good accreditation practice and after that period of time we went out for a
8 call to comment to our membership to see in regards to you know what would be good
9 for them and their programs, their students and they came back with 70%.

10 And we have used that number since I guess since 1998.

11 MS. NEAL: So let me go back to the placement issue -- how is it you
12 assess whether or not the information you are receiving is accurate?

13 MS. TATE: Well we have evaluation visits as you know and the accuracy
14 of the information provided to us is reviewed by the visitors during the sites. We also
15 have a standing committee that we call the Annual Report Committee which is overseen
16 by Miss Rowe here.

17 And we select randomly around 20% of our institutions that provide us the
18 back-up data. We call the data on the information provided to us -- that the team or the
19 Committee I should say, to verify the information that is there. We do the same when we
20 are going on visits.

21 So we do about 120 visits a year so the data is then also evaluated during
22 that time.

1 MS. PHILLIPS: Yes opportunities for Committee members to ask
2 questions, Arthur?

3 MR. ROTHKOPF: Yes, you noted in your opening comments about the
4 enormous significance of technology and I guess my question is how do you evaluate the
5 technology of your member organizations you know the ones that you have accredited to
6 be sure that they are keeping up?

7 I'm not sure how long your accreditation period is but these technology
8 changes in health are just moving so rapidly and institutions are changing -- I guess I
9 would like a sense of how do you keep up with what your accredited organization are
10 doing and be sure that they are doing as much as they can.

11 There are obviously also cost issues. There's one thing at one of these
12 huge medical centers that has you know great resources and endowments they can keep
13 up very quickly and rapidly but some of the smaller institutions can't do it so I am trying
14 to understand how do you go about evaluating that technology at your institutions?

15 MS. ROWE: Are you referring to the review of distance education
16 programs? Is that what you are seeking clarity on? How we review programs that are
17 offered via distance education and the technology format?

18 MS. PHILLIPS: I think the question that he is posing is how do you --
19 how does the curriculum prepare students for the emerging technologies in the
20 profession?

21 MS. ROWE: Sure okay as Florence indicated earlier we have a Standards
22 Review Committee and they update standards. They meet with what we call our

1 programmatic accreditation committees if it is medical assistant, medical laboratory
2 technology or surgical technology or program advisory committees and so they meet
3 either via phone or in person once a year and they are made up of practitioners and
4 academics and they provide us information to keep us up to date on the technology piece
5 and then we will update our standards where necessary.

6 MS. PHILLIPS: How about Committee member questions, Kathleen?

7 MS. ALIOTO: Well we had some discussion yesterday about monitoring
8 fraud -- how do you manage to do that?

9 MS. TATE: I'll answer that question. I just don't want to miss anything.
10 Here are the areas that ABHES monitors. We monitor standards, we monitor outcomes
11 that are trending downward, we monitor student financial aid notices, we monitor third
12 party comments and information from the states.

13 ABHES has all sorts of mechanisms in place to monitor our institutions
14 and programs and determine if an institution or program is not meeting our standards or
15 at-risk of not meeting the policies. Additional monitoring includes but it is not limited to
16 reporting on financial capability and reporting related to participation in a federal student
17 aid program as well reporting on retention, placement and /or credentialing rates.

18 And we work very, very closely with student financial assistance. We
19 have an Outcome Review Committee that monitors institutional members' rates in terms
20 of retention, credentialing and placement.

1 MS. ALIOTO: On the other side of the responsibility how do you -- let's
2 say a school was having some problems what do you do to help to support them in
3 making the necessary changes?

4 MS. TATE: Well we have our annual conference and at that conference
5 there are workshops in all areas of operation to the institution. We have a roundtable
6 which the institutions and members could come and ask us questions and meet with the
7 Commissioners, meet with us and we are a very responsive institution.

8 Agencies call us, members call us all the time in regards to areas that they
9 feel they need additional help. Before we begin or are in the process or institutions that
10 are in the process of making application to ABHES we have what's called a preliminary
11 review and it is during that preliminary review that the staff determines whether or not
12 the institutional member making application is ready for accreditation.

13 MS. PHILLIPS: Ralph?

14 MR. WOLFF: This is really not a question for you so relax. But more a
15 comment -- I want to follow up on something Anne said yesterday that maybe it was two
16 days ago about the consistency of reports. 6.02.16 I think is the one that calls for student
17 achievement of licensing exams and like and when I go to the detailed staff report I don't
18 see your 70% listed so I would just ask that we have more of that information whether it
19 comes from the -- and it doesn't appear it was provided by the Agency but that we have
20 consistency about what the benchmarks are if there are benchmarks by it.

21 But when I go it is more about in your response to student achievement
22 and the staff analysis -- it's really all about the process of how reports are treated but

1 nothing about what you just described and so I would like more maybe I missed it but
2 I'm looking on the detailed -- I may just need more education on going to the --

3 MS. PHILLIPS: The final staff report rather than the detailed staff
4 analysis.

5 MR. WOLFF: Oh I was going to the detailed staff analysis okay I stand
6 corrected, you submitted it I didn't read it, thank you.

7 MS. PHILLIPS: Other Committee questions, Anne?

8 MS. NEAL: Yes along that line I mean I am looking actually at
9 something the DOE compiled and I assume it is in the report I will go back and look but
10 it says here that you expect only a 70% exam participation rate and then that your exam
11 pass rate guideline is 70% of those 70%. How did you decide that only 70% was
12 sufficient for purposes of assessing their exam success?

13 MS. TATE: Go back to the validity and reliability that Karen
14 Kirchenstein talked about and how it is linked to the mission of every single institution.
15 We expect that our institutions in health care have a great deal of contact with health
16 facilities -- and the 70% is just a minimum. We have done the analysis -- bell curve
17 analysis and determined in terms of the mean and the median that 70% is consistent with
18 our review, did I answer your question?

19 MS. NEAL: I'm not sure.

20 MS. TATE: Okay we can try it again.

21 MS. NEAL: It says 70% participating so what happens to the 30% that
22 don't participate?

1 MS. TATE: We do not have a participation rate.

2 MS. NEAL: I guess then I am relying on a DOE document so perhaps that
3 is not accurate.

4 MS. PHILLIPS: Other questions. I have two questions myself. One on
5 the 70% rate did the liability and validity study look at how somebody could pass to the
6 70% pass rate function in their job eventually?

7 MS. TATE: No.

8 MS. PHILLIPS: Thank you. So my last question is you have prepared a
9 lot knowing our questions coming up. I wondered if there were answers that you were
10 particularly proud of that we haven't asked the questions for?

11 MS. TATE: I'm proud of my staff. I am proud of our Agency. I think
12 that we are fair and we believe in the achievements of our students of our institutions. I'll
13 borrow a phrase taken from our former counsel, he would say, "We want to make sure
14 that everyone passes my loved one's test so that if any of you are at the hospital we have
15 to make sure that if it is your loved one that they have passed the test to work on you."

16 MS. PHILLIPS: Thank you. Any other Committee member questions?
17 Okay seeing none I don't believe we have any third party comments for this Agency.
18 Does Department want to respond further? Okay at that point we can move into
19 Committee discussion and vote if there is a Motion that you would like to put on the
20 table.

21 MS. NEAL: I move to renew the Agency's recognition for a period of
22 five years.

1 MS. PHILLIPS: We will get that up on the screen. Do I have a second?
2 Second by Ralph -- so the Motion was to make a recommendation to renew the Agency's
3 recognition for a period of five years discussion? Ralph?

4 MR. WOLFF: I think it's not a question just for this Agency but when we
5 increasingly -- we are getting and discussing information about benchmarks, 70%, 60%,
6 50% and then we are asking Agency's and repeatedly we are hearing, "Well it was
7 adopted 20 years ago -- 30 years ago -- 15 years ago and it seems to work. I think we or
8 somebody needs to be more clear -- are there expectations about what kinds of reviews of
9 quantitative benchmarks would be expected.

10 Because I want to make sure we are consistent in terms of at least the
11 expectation of the review and the numbers seem to work but what kind of analysis and it
12 seems unfair to have one agency expectations of one agency be completely different from
13 another one but we raised this with ABA's big issue yesterday et cetera.

14 At the last meeting as well we had 50% completion, 60% placement and
15 so I don't think we should be setting a bright line or anyone should be setting it other than
16 the Agency but I think we ought to know how they come to these figures rather than
17 historical adoption.

18 MS. PHILLIPS: There will be a point I will ask you to bring up again
19 during our discussion of the pilot because I think it strikes me as an outcome of the pilot
20 needing to have that kind of information.

1 Okay we have a Motion on the table that has been seconded any further
2 discussion? We'll call the question this will be by hand, those in favor? Those opposed?
3 Abstentions?

4 **NACIQI RECOMMENDATION:**

5 Thank you the Motion carries. Congratulations we have one set of questions for you
6 before you leave. Anne, do you want to do that after, the questions about the institutional
7 quality -- improving institutional quality?

8 MS. NEAL: How does the Agency define an at-risk status?

9 MS. TATE: It also begins with where we monitor our member programs.
10 We use standards, outcomes that are trending downward, student financial aid notices,
11 third party comments, information from the states and we get a lot of information from
12 FSA regarding the program reviews and asking us if there are any areas in terms of an
13 institution's outcomes or achievements or if they are on show cause that they should be
14 made aware of before they complete their program reviews.

15 So those are the at-risk areas that we have. It's on the entire operation and
16 it can be either academic or financial.

17 MS. PHILLIPS: Any other Committee questions? Thank you very much
18 again for your patience and congratulations.

19 MS. TATE: Thank you very much.
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1 **COMMISSION ON ACCREDITING OF THE ASSOCIATION OF**
2 **THEOLOGICAL SCHOOLS (ATS)**

3 MS. PHILLIPS: Our next Agency for consideration Renewal of Recognition of the
4 Commission on Accreditation of the Association of Theological Schools, the Primary
5 Readers for this were Hank Brown and Federico Zaragoza. Department staff is Chuck
6 Mula who is currently represented by Valerie Lefor.

7 MR. ZARAGOZA: The Association of Theological Schools in the United
8 States and Canada (ATS) began as the Conference and Theological School in 1919. And
9 in 1936 became the Association of Adopted Standards for Judging Theological
10 Educational Quality.

11 The ATS Commission on Accrediting the Commission had in the past
12 conducted its accrediting activities on behalf of ATS. However in June 2004 a
13 reorganization of the Association separated the Agency into two entities, namely the
14 Association of Theological Schools in the United States and Canada and the Commission
15 on Accrediting of the Association of Theological Schools.

16 The result was a clear and distinct separation of the accrediting operations
17 from the primary association. Those insuring that the accrediting body and its operations
18 remained separate and independent from ATS. In 1951 the U.S. Commission of
19 Education first granted recognition to the Commission as a nationally recognized
20 institutional accrediting agency.

21 At its June 2004 meeting the scope of recognition was extended to include
22 delivery by distance education methodology. In 2011 the NACIQI recommended to the

1 senior Department that the Agency's recognition be continued for 12 months while the
2 Agency prepared a compliance report.

3 The Agency's compliance report was reviewed and accepted at the
4 NACIQI June 2013 meeting. Part of the Agency's compliance report was a request by
5 the Agency to remove pre-accreditation from the scope of recognition. The senior
6 Department official granted the revision to the scope of recognition and renewed the
7 recognition of the Agency for a period of three years.

8 The action today is an Agency Petition for Continuation. The Department
9 did not receive any written third party comments nor any complaints during this period.
10 Madame Chair I will defer to staff with a report.

11 MS. LEFOR: Good morning again I am Valerie LeFor and I will now
12 read a statement on behalf of Chuck Mula.

13 Good morning Madame Chair and members of the Committee. For the
14 record my name is Chuck Mula and I will now be presenting a brief summary of the
15 Petition for Continued Recognition submitted by the Commission on Accreditation of the
16 Association of Theological Schools hereafter referred to as ATS or the Agency.

17 After staff's extensive review of the Agency's Petition and supporting
18 documentation the Department found ATS to be in compliance with the Secretary's
19 criteria for recognition with no issues or concerns. The Department did not receive any
20 written third party comments or complaints during this cycle regarding the Agency.
21 Therefore the staff recommendation to the senior Department official for the Agency is to
22 renew the Agency's recognition for a period of five years. This concludes my report.

1 Representatives from the Agency are here today and we will be happy to
2 answer any questions that the Committee may have, thank you.

3 MS. PHILLIPS: Any Reader of Committee questions for the staff? Okay.
4 We invite the Agency representatives to join us at the table. Welcome thank you for
5 being here and thank you for your patience.

6 MR. ALESHIRE: I'm Dan Aleshire and I am the Executive Director and
7 my colleague with me is Tom Tanner who is one of our Directors of Accreditation and
8 Institutional Evaluation and who prepared the Petition for the Department's review. The
9 Chair of the Commission on Accrediting was here Wednesday but is unable to be present
10 today.

11 I have noticed the emerging religious character of these deliberations over
12 this time. Jewish and Christian scholars have both tried to figure out what eternity means
13 I think NACIQI has developed its own definition. Yesterday an Agency was asked if it
14 was truly repentant which is sort of an overall religious theme and we are grateful for the
15 chance to be here to represent the work of our Agency for your consideration and
16 questions.

17 MS. PHILLIPS: Thank you Primary Reader questions of the Agency
18 including the initial pilot questions?

19 MR. BROWN: Good morning. Share with us if you would a little bit
20 about the benchmarks that you use in evaluating?

21 MR. TANNER: In response to the first set of questions dealing with
22 outcomes may I make a statement first. My name is Tom Tanner and responding to those

1 questions we just want to note for the record that some of the important data presented for
2 the Agency on the dashboard is contradictory and therefore cannot be correct.

3 Specifically the dashboard correctly reports that serve as a Title 4 gate-
4 keeper for 71 institutions but the charge to the right of that list is not 71 but 217 including
5 198 for-profit schools. We do not accredit any for-profit schools of theology and it
6 would be hard to imagine that there would be 198 for-profit schools of theology.

7 MR. ALESHIRE: We are looking for one as a matter of fact.

8 MR. BROWN: So hard to think they would be profitable.

9 MR. TANNER: We'll also note for the record that our scope of
10 recognition is limited graduates of theological education. We are still trying to
11 investigate why three of our schools listed 158 undergraduates on that but we do collect
12 information on graduate students regarding graduation rates, student debt and student
13 loan repayments for all 245 of our accredited schools.

14 So regarding graduation rates while we have collected time to completion
15 rates for many years we just began collecting graduation rates themselves this past year.
16 For this first year we used the formula of 150% of the average time to completion. For
17 our most popular degree the Master of Divinity that produced an overall graduation rate
18 for our school of 67% but we know from time to completion data that if we had used
19 200% it would probably have been around 80%.

20 That rate would be higher but about 70% of our students are older, over
21 the age of 30 and are fasted growing demographic are students over the age of 50. Most

1 of those students work and attend part-time so it takes them longer to complete a typical
2 90 credit Master of Divinity.

3 Another factor impacting graduation rates for seminarians is that most
4 churches do not require Master of Divinity to ministry but many do encourage some
5 seminary. For those reasons we have no bright lines or benchmarks in our standards for
6 graduation rates. But to better evaluate graduation rates our Board of Commissioners
7 have voted earlier this month to start monitoring schools with low rates below 25%.

8 For those who do graduate however more than 90% are placed within 12
9 months. One reason for that high placement rate is that many seminarians are already
10 serving in ministry while in school and simply continue in those positions beyond
11 graduation. A seminary degree is not seen by many as a way to enter ministry but as a
12 way to be enriched while administering.

13 Regarding student debt we collect data on that every year from our
14 school's graduates. Last year nearly half -- 45% incurring no debt in seminary, the other
15 half reported an average of \$29,000 in debt. Over the last several years we have directed
16 a 15 million dollar grant project from the Lilly Endowment to research study debt for
17 clergy and to find ways to lower it for our students.

18 One finding that has emerged is that student debt has no necessary
19 correlation to tuition costs since most seminarians are older students with families who
20 borrow for living expenses. And regarding payment rates -- among the 71 schools for
21 which we serve as the title for gate-keeper the average default rate is 5.4%. We have no
22 member schools that exceed or even come close to federal threshold.

1 We also have no member schools that are under heightened cash
2 monitoring 2 status, so those are some of the -- hopefully in response to your question.

3 MR. BROWN: Thank you Dr. Tanner. Obviously your schools end up
4 having a wide diversity in terms of theological thought. Share with us a little bit about
5 the standards that you use then looking at them?

6 MR. ALESHIRE: The Master of Divinity which is the degree that about
7 40% of the students in ATS schools are pursuing -- the standards try to provide a
8 consistent basis across a wide theological perspective. So we ask the schools to
9 demonstrate that its curriculum addresses the texts and traditions of a religious
10 community. That it addresses the skills necessary for public and religious leaderships
11 in those contexts, that it deals -- has programs and courses to help them deal with cultural
12 analysis and congregational analysis and that it has programs of study that cultivate
13 personal and human formation because ministry is a profession that depends on a certain
14 quality of human character and spiritual maturity.

15 So we use those four general guidelines and then let schools fill them out
16 as they see appropriate in their religious and confessional contexts.

17 MR. BROWN: What kind of adverse actions have you had to take in the
18 last five years?

19 MR. TANNER: Since our last renewal recognition in 2013 the
20 Commission has made 1,338 accrediting decisions affecting all but three of our 245
21 institutions. Some 80% of those involve either substantive changes mostly for new

1 programs or routine reports to help schools improve, mostly as related to assessment of
2 student learning.

3 Another 12% of all decisions involve regularly scheduled accrediting
4 visits more than half of which resulted in less than maximum period of accreditation
5 allowed by our standards. The remaining 8% of all accrediting actions, roughly 100 since
6 2013 were to place member schools on monitoring, warning or probation primarily for
7 areas related to finances and to assessment of student learning.

8 While we have not withdrawn the accreditation of any member school
9 since 2013, 6 of our members withdrew voluntarily because they faced sanctions that
10 would have led to the loss of accreditation.

11 MR. ZARAGOZA: First I want to congratulate the Agency for this
12 relatively good review. I believe in 2011 there were 20 citations I believe lodged to this
13 Agency including 6.02.15 which is staff and financial resources. Specifically the Agency
14 had 6 staff.

15 Now in the current report I understand you still have 6 staff but are now in
16 full compliance so what are some of the lessons learned? How did you do it? What
17 advice would you give us in terms of how organizations can make this complete
18 turnaround as it is apparent that you have?

19 MR. ALESHIRE: I was here 5 years ago when we had a number of issues
20 we were asked to address. There are two ways in which we handle with the size staff that
21 we do. The Commission maintains a memorandum agreement with the Association that

1 provides a lot of indirect services so the Association maintains the database that has two
2 full-time staff persons that manage it.

3 It contracts -- the Commission contracts for the work of Chief Financial
4 Officer so while there are 6 staff all of those 6 are doing only accreditation activities.
5 The institutional and organization support activities are contracted from the Association
6 and it allows us to get more focus out of those positions.

7 We have translated one administrative position into a professional position
8 and have done a great deal in terms of -- in that position in terms of record keeping,
9 maintenance of the kind of detail of information that we need to do the work. The main
10 way to be able to do it with 6 is that we have administrative services provided by contract
11 that if they were present the staff would need to be probably larger by 2 or 3 persons.

12 MR. ZARAGOZA: Has there been any impact in terms of the focusing of
13 your scope of recognition by in fact removing the program adaptation component? Has
14 that had any impact on expectations and performance?

15 MR. TANNER: I would comment that one of the reasons we have done
16 that is the review of the candidacy period for our schools is a period of coaching to help
17 them become compliant with our standards rather than being fully compliance so by
18 removing that from Title 4 from accreditation status it gives us an opportunity to work
19 longer with those schools so that we feel that when they are ready for accreditation they
20 are fully ready and that coaching period or that coaching perspective is an important one
21 for our agency.

22 MR. ZARAGOZA: Thank you.

1 MS. PHILLIPS: Further questions for this Agency, Kathleen?

2 MS. ALIOTO: I have two questions. When you talked about the
3 assessment of student achievement what do you do to guide your schools in helping them
4 with student achievement?

5 MR. ALESHIRE: Maybe both of us could comment on that. We -- there
6 are three primary strategies we use with our schools. One is an extensive education
7 program about helping them learn how to construct an effective assessment strategy.
8 Religion is the ultimate free market expression in this country and so there are lots of
9 different ways we go so we have focused very hard on schools that don't have necessarily
10 educators on the faculty or statisticians on the faculty to develop the resources they need
11 to have effective assessment of learning.

12 And then we have held them accountable of the three most frequent
13 reasons why a school is called into some monitoring or potential sanction area is either
14 inadequacy of their assessment program or finances or issues in governance. So they are
15 held accountable and then we provide educational resources to help them figure out how
16 to do it and we are noticing progress.

17 MR. TANNER: I might also add that in 2014 we published a new booklet
18 guide on assessment of student learning for our member schools and we followed that up
19 with a number of webinars and workshops and school by school counseling and coaching
20 in that area and that has seen a significant improvement in our schools ability to assess to
21 the learning such that the number of negative actions taken by our Board about student
22 achievement has dropped by roughly one-third since the publication of that document.

1 MS. ALIOTO: I am also just curious if you have Catholic, Jewish,
2 Muslim or what is the breakdown of your --

3 MR. ALESHIRE: Our by-laws allow for members who are Jewish or
4 Christian traditions. They do not allow for schools outside of those traditions and
5 currently we have no Jewish schools that are members so we have the broad range of
6 Christian institutions from Harvard Divinity School to Oral Roberts School of Theology,
7 a fairly broad.

8 MS. ALIOTO: Any Jesuits?

9 MR. ALESHIRE: Yes we have two Jesuit institutions. The two
10 seminaries one that is related to Boston College, the other that is related to Santa Clara
11 University and then we have other Jesuit institutions Seattle University, Loyola
12 Marymount in Los Angeles and Loyola in Chicago are also member institutions.

13 MS. ALIOTO: How about nuns?

14 MR. ALESHIRE: There are two kinds of religious nuns that are receiving
15 a lot of attention one of the NONE's -- who are persons formerly of religion -- that have
16 no religion -- we have no school particularly for them but we have a lot of schools that
17 are paying attention.

18 We do not have schools for the education of women religious primarily
19 because they work in a variety of ways and those that are working in parish or other kind
20 of religious context other than schools or social service agencies or that sort of thing
21 attend other Catholic seminaries but there are no seminaries specifically for women
22 religious.

1 MS. PHILLIPS: Other Committee questions, Ralph?

2 MR. WOLFF: Well Dan I think you give a new definition of eternity for
3 how long you have been at ATS.

4 MR. ALESHIRE: This is my last NACIQI meeting. I said that 5 years
5 ago but like Freddy Kruger I'm back.

6 MR. WOLFF: We may see you again. Years ago there used to be joint
7 visits between ATS and regional accrediting bodies and I just wanted to verify my
8 recollection and see if I think they have all ended as a result of concerns about the
9 Department about independent reviews and I just wonder is there -- are you still doing
10 joint reviews, is it an economic issue for institutions saving them from two entirely
11 separate review processes?

12 We used to work together well and I really enjoyed and learned a lot from
13 the work that we did together.

14 MR. ALESHIRE: When I came to ATS about 80% of the U.S. institutions
15 were both regionally and ATS accredited and we had cooperative agreements with all 6
16 of the regionals about how we would do joint visits based on a common self-study that
17 addressed the standards of both agencies. Given the expectations of unique training
18 strategies, of independence of decision-making as you have noted Val all of those have
19 dissipated with the exception of one agency that -- one regional agency that we continue
20 to do some joint visits with.

1 With others we have done concurrent visits but for the most part the effort
2 to do joint visits has been eliminated primarily as an effort for both -- regional agencies
3 and ATS to meet Department expectations.

4 MR. WOLFF: I would just comment in some cases it can be a highly
5 duplicative and costly process for very small understaffed seminaries and inefficient and
6 unproductive and I would just comment where Department rules are not supporting
7 innovation or cooperation.

8 MS. PHILLIPS: Other Committee questions? My question and then Jen
9 has a quick update -- my question for you is you have clearly done so good preparation
10 for those questions that we were going to ask. Are there answers of which you are
11 particular proud that we haven't asked the questions for?

12 MR. ALESHIRE: I'm proud of anything my colleague Tom Tanner puts
13 together. One thing that I just want to raise as when we look at student debt for seminary
14 students the public issue is default, the issue for our community of schools is the amount
15 of debt.

16 So our students are paying their loans. Tom mentioned that we are
17 coordinating grants of totaling 15 million dollars that literally the endowment has made
18 to ATS member schools to try to help students deal with financial literacy and figure out
19 how to reduce that. Debt is a problem for persons who go into low paying human service
20 professions and we are working very -- but we don't have any strategy of schools because
21 if the student can demonstrate that they need the full need the school can't say no you
22 shouldn't borrow that much.

1 So we are faced with the administration of a loan program that prohibits
2 schools from limiting the amounts that students can borrow and that they are in effect
3 borrowing more than is good for their subsequent work. So we have students -- the worst
4 case are that they reach graduation and they can't go into ministry because they have to
5 find a higher-pay work and they are sufficiently morally responsible, they are basically
6 going to pay their loans.

7 So we have a worry as students need loans we don't want to reduce access
8 but on the other hand there are problems that the loan system itself creates for
9 conscientiousness schools that are trying to limit the amount of borrowing that students
10 do. I know lots of schools that if they had the option would put a limit on that and say
11 here's how much you are going to make, here's how much but as Tom mentioned 70% of
12 our students are over 30 and they come to seminary later in life, many of them they have
13 larger real-life costs and so they borrow money and we are working very hard at
14 developing the institutional practices that will reduce the amount of borrowing and insure
15 more effective work in their perception of their vocation and their calling.

16 MR. TANNER: One other thing I might add is that our sister organization
17 AKS was just awarded last year 6 million dollars again by the Lilly Endowment to
18 research over the next 3 years educational models and practices among theological
19 schools and we intend to use all of that information that we are gathering from all of our
20 schools to help us in the redevelopment of our standards which we hope to launch after
21 that project is completed.

1 We even have peer groups looking at things like competency based
2 education for theologies.

3 MS. PHILLIPS: Thank you. Jennifer has a clarification on the data.

4 MS. HONG: Yes just looking back on the score card data so on the
5 attendance spread sheet the company -- the dashboard which is also posted on the website
6 it correctly reflects that the Agency does not accredit for-profit institutions and the
7 number of the agencies is correct but we will make that adjustment on the dashboard.

8 Another point I wanted to make though about the degree-seeking
9 undergraduates we know that with at least another agency those data are reported by the
10 institutions so the institutions are reporting what degree level that they are serving. So
11 we know of at least another agency that claimed that they only accredit above the degree
12 level -- in fact some of their institutions were often Bachelor degrees and that's why the
13 score card reflected it that way.

14 So you may need to check with your institutions on how they are reporting
15 this information.

16 MR. TANNER: We intend to investigate those three institutions. We just
17 learned this data last Friday and I think at least two of those three are regionally
18 accredited, duly accredited and probably should list the regional as their gate-keeper and
19 not us. We'll investigate that.

20 MR. ALESHIRE: And we knew that the excel file was correct it was the
21 translation to the pictures to the graphs.

1 MS. PHILLIPS: Thank you Jennifer for that clarification. Any questions
2 for this Agency? I believe we don't have any third party comments, any Departmental
3 response to the Agency so we can move to Committee discussion, Motion and vote. Are
4 the Primary Readers prepared to advance a Motion?

5 MR. BROWN: I would like to make a Motion -- I move that NACIQI
6 recommend that the Commission on Accrediting of the Association of Theological
7 Schools Recognition be renewed for an eternity of 5 years under NACIQI rules that
8 would be 5 years.

9 MR. ZARAGOZA: I second that.

10 MS. PHILLIPS: The Motion has been moved and seconded. Further
11 discussion? Other definitions of eternity? We'll call the question those in favor signal by
12 raising your hand -- those opposed -- abstentions?

13 **NACIQI RECOMMENDATION:**

14 Thank you the Motion carries, congratulations. One last set of questions for you -- I
15 don't know if the Readers want to pose the questions about at-risk and improvement
16 Federico or Hank? I'll go ahead and pose them.

17 We have been asking as you know agencies to talk about how they
18 identify programs or institutions at-risk and what is done to help them and if that is
19 effective?

20 MR. ALESHIRE: I think that ATS institutions -- we don't have a formal
21 definition of at-risk but we have a practical definition and that is that they are showing up

1 at some point of monitoring accrediting intervention which for us will either be finance or
2 assessment or governance those are the three areas.

3 We have through our partner organization the Association of Theological
4 Schools, worked at length we have identified financially at-risk schools and invited them
5 into two year programs to look at their economic model, to work with consultants, to help
6 them think through how they could move toward more stable financial base. We have
7 done educational programs on assessment with schools we have provided consultants to
8 work with schools.

9 And the third area, governance we now have a project going on with 20
10 schools who are working with teams of Board members, institutional Presidents,
11 representatives of faculty dealing with issues related to that the schools have identified as
12 their governing difficulty so for some it is shared governance for some it is how they
13 work as a unit within a larger educational institution, et cetera.

14 MS. PHILLIPS: Thank you very much, any other questions by the
15 Committee? Thank you very much and congratulations we appreciate your patience.

16 Okay in the next portion of the Agency reviews we now turn to the
17 agencies that have submitted compliance reports or other reviews under the regulations
18 for these that are not involved in the pilot projects the procedures revert to our standard
19 primary Readers introduced, Department staff provides briefing, Agency representative
20 provides comments, any third party comments, Agency response, staff response and then
21 our discussion and the vote.

22

1 **AMERICAN VETERINARY MEDICAL ASSOCIATION, COUNCIL ON**
2 **EDUCATION (AVMA)**

3 For this next agency that comes before us this is a Compliance Report for
4 the American Veterinary Medical Association Council on Education. The primary
5 readers are Roberta Derlin and Frank Wu, Department staff is Nicole Harris. I believe
6 that we do have third party commenters for this Agency and so we will adjust our time
7 accordingly and ask Bobbie Derlin and Frank Wu to present the Agency.

8 MS. DERLIN: I will introduce this. The American Veterinary Medical
9 Association is a programmatic accrediting agency that currently accredits 28 schools of
10 veterinary medicine located in regionally accredited universities. The AVMA was
11 formed in 1863 to recognize the veterinary medical profession in the United States.

12 It began accrediting schools of veterinary medicine in 1906 through its
13 Committee on Intelligence and Education. In 1946 the AVMA was re-organized and the
14 Council on Education -- COE, replaced the Committee on Intelligence and Education.

15 The programs accredited use the Agency's accreditation to participate in
16 the health profession student loan program offered through the U.S. Department of
17 Health and Human Services. Agency recognition does not enable its programs to seek
18 eligibility to participate in the Title 4 funding programs.

19 The COE of the AVMA was on the Commissioner of Education's first list
20 of nationally-recognized accrediting agencies published in 1952 and its recognition has
21 been renewed periodically. The Agency was last granted a period of recognition for five
22 years in 2007.

1 The COE of the AVMA was last reviewed for recognition again in
2 December 2012 and at that time the Agency was asked to prepare a compliance report.
3 This analysis currently is the subject of the compliance report which has been recently
4 submitted as the result of good cause extension in March of 2015 and I will now pass this
5 on to staff for further illumination.

6 MS. HARRIS: Good morning Madame Chair and members of the
7 Committee. For the record my name is Dr. Nicole S. Harris and I will be presenting
8 information regarding the compliance report submitted by the American Veterinarian
9 Association also referred to as the AVMA or the Agency. The staff recommendation to
10 the senior Department official is to accept the Agency's report and continue the Agency's
11 recognition for one and one-half years.

12 The recommendation regarding a one and one-half year period of renewed
13 recognition is merely a reflection of the fact that the Agency had been given a prior
14 extension for good cause and is therefore nearing the end of the maximum five year grant
15 of recognition.

16 The Agency adequately addressed all of the staff concerns from the Fall
17 2014 compliance report and there are no outstanding issues remaining for this Agency.
18 The Department received over 200 written comments in regard to this Agency from
19 practitioners, educators, educational institutions and state veterinary medical associations.

20 Approximately 5% of the comments received were in support of the
21 Agency citing the Agency's strength in curricula, excuse me, and flexible delivery
22 including the expansion of course offerings and new teaching methods.

1 The supportive comments referenced that the Agency is broadly accepted
2 throughout the educational community and recognized as the most appropriate
3 accrediting Agency for academic veterinary medical programs. Further comments asset
4 that the application and changes to standards of accreditation are handled in a manner that
5 assures that accredited colleges and schools of veterinary medicine produce qualified
6 entry level veterinarians.

7 The comments refuting the Agency were based largely on the lack of
8 acceptance of the Agency by others, systematic review of standards and student
9 achievement. The Agency addressed these concerns through documentation of survey
10 responses to targeted audiences and the public blog posts, constituent feedback and
11 revisions to their policies and procedures to include additional surveys and outreach for
12 future reviews of standards.

13 The Agency provided additional explanation of student achievement and
14 outcome measures specifically the Agency uses the North American licensing
15 examination pass rate as the student achievement standard for U.S. colleges of
16 veterinarian medicine along with the following outcome measures: Student assessment
17 in the pre-clinical and clinical curriculum, attainment of the 9 clinical competencies,
18 evidence of senior students taking the NAVLE and college, I'm sorry, college satisfaction
19 surveys for graduate students and employers.

20 The Agency also provided clarification on the attainment and use of five
21 year trend data to review attrition and placement rates. Finally some written comments
22 reference concerns about conflicts of interest in its response to the compliance report the

1 Agency provided additional information about its conflict of interest policies, in
2 particularly the removal of a member. The Agency included extensive documentation
3 related to its Code of Conduct, conflict of interests and removal of member policies,
4 training on conflicts of interest and circumstances surround the removal of a member.

5 Training materials and excerpts from existing policies and procedures
6 were provided to the Department along with meeting minutes from the Council decision
7 on the revisions to the removal of members which included the solicitation of
8 independent counsel to assist in these matters moving forward.

9 Commenters also requested at the AVMA CEO, the independent and
10 autonomous which was not an item reviewed for the compliance report since the Federal
11 Registry notice states that written and oral third party comments are to address only those
12 criteria for recognition that are currently under consideration. This concludes are
13 presentation. There are AVMA representatives here today and we will be happy to
14 respond to the Committee's questions, thank you.

15 MS. PHILLIPS: Thank you, Frank?

16 MR. WU: I do have a question for staff although I think this is mainly for
17 Sally. There is a very interesting statement at the end of the staff report and it is
18 interesting not only with respect to this agency but more generally and I think would be
19 of interest to other NACIQI members and to the world at large. It is the following.

20 So there are some critical third party commentators and at the very end of
21 the final staff report in the very last paragraph staff writes the following: That 17 to 24%
22 of respondents to the accreditation survey ranked student debt, number of veterinarians

1 practicing in the United States and average salary as among the top three items that
2 should be considered when establishing and implying educational standards so -- once
3 again debt, number of vets out there and salaries so these are all about the work place.

4 Staff then writes the following: However these are issues for the
5 profession not directly related to the assessment of educational program qualities so I
6 want to be very clear what this is saying is that debt, number of vets out there and
7 average salary and these employment issues are issues for the profession not directly
8 related to the assessment of educational program quality.

9 So my question is -- is that due to the statute or regs or NACIQI practice
10 and to what extent are we, NACIQI, allowed to ask questions about and think about this
11 because it is applicable to many, many professions where some of the third party
12 commentary and some of the public outcry has to do with while there are too many
13 institutions, too many people going to these institutions, the market is being flooded,
14 therefore we want the accreditor to do something about this.

15 And people come before us as I expect they will based on the written
16 testimony and they say the accreditors do nothing about this, this is destroying the
17 profession, you NACIQI should make the accreditor do something about this -- so not
18 just with vets but with lots of other professions.

19 Is it permissible for us to make accreditors do something about this or is it
20 impermissible?

21 MS. MORGAN: Well as you know in general we can't prescribe
22 standards for agencies or say they have to have this one or that one. I would defer to

1 Nicole about what she specifically meant by that in particularly in a program like this that
2 does lead to an occupation. Placement is important so some of the issues that are you
3 talking about seem to be something that could be addressed under for example student
4 achievement standards.

5 Another thing I'll just mention I have mentioned it before but it is a
6 problem for accrediting agencies in general to address pricing issues because of the anti-
7 trust laws.

8 MR. BOUNDS: Yeah I just wanted to add on to it -- it's true that some of
9 those things are important. We just look at it as the Agency selects its own outcomes
10 measure. And their outcomes measure just happens to be that exam pass rate so we can't
11 tell the Agency that you have to have a particular rate.

12 We do when there are similar agencies out there so if we look at national
13 accreditors we will say this accreditor has an employment rate you don't, I can compare
14 apples to oranges. What I can't do is tell the veterinarians what some of those particular
15 standards should be for them related to medical doctors, related to psychologists,
16 whatever those fields are so that's the way we look at the report.

17 I can't tell them that they have to have that employment rate, their rate
18 happens to be the NAVLE. If the rules were changed and I could specifically say you
19 have to have this then we would put it in the report, that's where we stand on our review.

20 MR. WU: Great so am I hearing correctly the following: It's entirely
21 permissible for us, NACIQI, to ask questions about the employment market, you are
22 nodding yes. And it is entirely permissible for third parties to talk to us about it but not

1 permissible for us, NACIQI, to direct an Agency to write a regulation specifically about
2 employment and to tell them what the employment numbers have to be?

3 MS. MORGAN: Yes I agree with that. NACIQI is an independent
4 agency but as far as what the Department can ultimately do is your recommendation we
5 cannot tell, as you know, we cannot tell them you must have this kind of standard, you
6 must have that kind of standard and Herman mentioned the only exception is if there's a
7 similar agency we can say that is accepted by the community and why don't you have
8 that.

9 MR. WU: So one other follow-up question. I'm just curious about
10 something. What if, hypothetically within a profession, whether it is veterinarians or
11 lawyers or architects or chiropractors or nurses, there are many, many where this issue
12 arises -- what if many, many, many members of the profession came before us and said
13 the following: I'm a member of the profession and I no longer accept this accrediting
14 authority as reflecting the standards of the profession because they are allowing the
15 profession to be flooded with new entrants.

16 If we had let's say -- 500 people come before us to say that is that
17 something we should weigh or not weigh?

18 MS. MORGAN: I guess that kind of thing it seems a rather tenuous
19 connection and I suppose if you had 500 people come against an agency you could
20 consider it as far as whether the agency is widely accepted. But as you know we don't
21 say you have to be accepted across the board.

1 MR. WU: Great this is very useful thank you. I deliberately asked this of
2 staff now before the third party commentators because I think it will frame it nicely.

3 MS. PHILLIPS: Any other questions of the staff at this point, Bobbie?

4 MS. DERLIN: I just want to clarify no complaints have been received?

5 MS. HARRIS: Since the review of this report, no.

6 MS. PHILLIPS: Thank you. I'm sorry Anne?

7 MS. NEAL: You outlined that the Agency had a listening session just for
8 students to provide a safe environment for discourse. Are you suggesting that there is a
9 culture of intimidation within the Agency?

10 MS. HARRIS: I'll let the Agency address that when they come up in
11 more detail but in my discussions with the Agency in the review of the documentation
12 they outlined that the students felt more comfortable in a session for themselves to speak
13 freely as opposed to at conferences I'm not sure if it would be professors or whoever will
14 be in there with them, they had a session by themselves so they could feel comfortable to
15 speak freely.

16 MS. PHILLIPS: Any further questions for staff? Okay keeping an eye on
17 the clock, thank you. I want to have a brief break before we move to the next component
18 of this Agency review which is the third party comments. We are now at 12 minutes so
19 let me ask you to come back at 5 minutes after the hour, 10 minutes after the hour so a 15
20 minute break, we'll be back.

21 (Whereupon a 15 minute recess was taken to reconvene this same day.)

22

1 MS. PHILLIPS: Let me invite you all to return to your seats, conclude
2 your conversations. My apologies for a misspoken statement right prior to the break.
3 Our next step in this review of the compliance report is to hear from the Agency so I
4 would like to invite the Agency representatives to join us at the table. Thank you much
5 and thank you for your patience.

6 MR. PASCOE: Good morning and thank you. I'm Dr. John Pascoe and I
7 am just completing my 6th year as a member of the Council of Education and currently
8 serve as the Chair of the Council. I am a professor of surgery and the Executive
9 Associate Dean of the School of Veterinarian Medicine at the University of California
10 Davis.

11 With me today is Dr. John Scamahorn who is a private practitioner from
12 Indiana and is the incoming Chair of the Council and Dr. Karen Brandt who is also a
13 veterinarian and is the Director for the Research and Education Division of the Council of
14 Education -- sorry for the American Veterinarian Medical Association and she is the
15 principal staff support for the Council.

16 And just to refresh everybody's mind after the break I am going to repeat a
17 few things that you have already heard but I think they are pertinent. Veterinary
18 medicine is a relatively young profession we just celebrated the 150th anniversary of the
19 establishment of the first veterinarian school in the world in Lyon, France.

20 The American Veterinarian Medical Association as you have heard
21 through its Council on Education and its predecessor has been accrediting veterinarian
22 medical education programs in the United States since 1906 and it was on the first list

1 recognized by the Department of Accrediting Agencies in 1952. The Council is a
2 programmatic accreditor and as such is not required to be separate and independent
3 although as you probably noted from some third party commenters there's a believe that
4 it should be.

5 The Council is the sole accreditor of veterinary medical programs in the
6 United States and it is also recognized by the Council for Higher Education Accreditation
7 or CHEA. To provide some context there are approximately 100,000 veterinarians in the
8 United States. There are actually more lawyers in the DC metro area than there are
9 veterinarians in the United States.

10 Of that 100,000 veterinarians approximately 70,000 are members of the
11 American Veterinarian Medical Association and there are 28 schools or colleges of
12 veterinarian medicine in the United States and all of them are accredited by the Council
13 on Education and collectively they graduate just under 2,900 veterinarians each year.

14 The Council is sensitive to and monitors various indices of program
15 quality including student attrition which is less than 5% and more typically is less than 1
16 to 2%. We monitor the placement and graduate and employer satisfaction. To be
17 licensed to practice veterinarian medicine in the United States, veterinarians must pass
18 the North American Veterinarian Licensing Examination or NAVLE.

19 This is the single bright line student achievement standard used by the
20 Council. In 2015 99.7% of the graduating seniors of the U.S. veterinarian colleges took
21 the licensing exam and 97% passed. Further the placement rate for graduating

1 veterinarians is very high with more than 95% employed or seeking further specialized
2 training within their first year.

3 In 2014 the unemployment rate for veterinarians nationally was 4.5%
4 which is lower than the national average and lower than the natural unemployment rate
5 for the U.S. In an independent survey in 2015 there were no significant differences found
6 between accredited programs, in program quality, outcomes assessment of competencies,
7 under-employment or income earned.

8 These data suggest that there is little differentiation in program quality
9 across the 28 accredited programs. Nevertheless there has been publically stated opinion
10 to the contrary from a small segment of the profession and that the 2014 hearing NACIQI
11 directed the Council to undertake activities to ensure broader acceptance by the
12 profession and by educators.

13 The Council acknowledged that directive and has worked diligently over
14 the past 18 months to listen to and where appropriate address those concerns. This has
15 involved a multi-faceted approach of one -- facilitated public listening sessions at
16 professional meetings, the transcripts of which were made publicly available.

17 Two -- an opportunity for students to participate in discourse on
18 accreditation; three -- a number of surveys to assess understanding of accreditation, the
19 appropriateness and relevance of the standards for evaluating veterinary education quality
20 and the importance and value of accreditation and the COE's performance in application
21 of those standards.

1 Four -- enhanced opportunities for the profession and the public to
2 comment on accreditation. And five -- a series of printed and electronic media
3 communications to educate the profession on accreditation and the rationale for decisions
4 by the Council.

5 Has the Council been successful in its outreach activities? The substantial
6 decrease in third party comments since 2014 would suggest so. However the Council
7 also recognizes that this is only the beginning and it must continue to engage stakeholders
8 and is sincerely committed to doing so with additional planned opportunities for dialogue
9 and education about accreditation.

10 I would submit that the Council has demonstrated by its actions that it is
11 listening, that it is making changes where appropriate to its standards, policies and
12 practices. Democracy is robust and messy and it provides the opportunity for freedom of
13 expression and we respect and cherish that right but also acknowledge that we are more
14 likely to change the deeply held convictions of some third party commenters that have
15 been expressed in previous recognition hearings and will likely be restated today.

16 Nevertheless we are committed to continuing to listen and above all to
17 ensure that veterinarian medical colleges in the United States are providing students with
18 the highest quality education that meets the needs of the profession and society.

19 In closing we thank you for the opportunity to appear today and appreciate
20 the Department's thorough review of the Agency. The Council is better and stronger for
21 those recommendations and remains committed to continuous quality improvement. We
22 would also sincerely thank Dr. Jennifer Hong, Dr. Nicole Harris, our U.S.D. staff analyst

1 and Mr. Bound for their guidance in the development and submission of our compliance
2 report. As noted in the staff report the Department found that the Council was in full
3 compliance with all of the recognition requirements and we hope that NACIQI will agree
4 with our assessment and grant the COE continued recognition, thank you.

5 MS. PHILLIPS: Thank you Reader or staff questions of the Agency at
6 this time, Bobbie?

7 MS. DERLIN: I'd be interested in knowing in conducting your listening
8 sessions and sort of a campaign to broaden communication with constituents how
9 engaged were just members of the general public and did you have any specific initiative
10 as you mentioned?

11 There's a cadre of folks who have some differences of opinion about
12 things. Did you have any special efforts to engage those people?

13 MR. PASCOE: The listening sessions were conducted at three
14 professional meetings, the largest three in the United States. They were open meetings
15 that were available to anybody to attend and most of the individuals who have previously
16 testified as third party commenters at recognition hearings also provided commentaries at
17 those meetings as well.

18 The first two sessions were conducted as facilitated listening sessions.
19 The Council then took those transcripts from those meetings synthesized the comments
20 and in the third meeting which was held at the National Convention started that facilitated
21 listening session by providing a response to the comments that it had heard.

1 There was some division of labor there because as was noted by Frank
2 earlier some of the issues that were raised were felt to be issues for the profession and not
3 for the Council and so to launch that third session members of the Board of Directors of
4 the American Veterinarian Association addressed those issues that were considered issues
5 for the profession.

6 So this revolved around work force issues, student debt, debt to income
7 ratio, et cetera and the Council representatives that were present at that session answered
8 the questions that were directly related to accreditation. Does that answer your question?

9 MS. DERLIN: That answers a portion of the question. The other piece I
10 am interested in and then I have a follow-up is engagement of members of the general
11 public -- you mentioned there were opportunities for anyone to comment. Did anybody?
12 Just everyday people on the street -- I love my vet?

13 MS. BRANDT: All of the changes, potential changes to the standards et
14 cetera are a public portion of the website and no there were no public comments that were
15 received from someone that was not in the profession.

16 MR. PASCO: So from the sessions that I attended I don't because the
17 facilitator asks people to identify themselves and their affiliation. I don't recall
18 specifically members of the public speaking.

19 MS. DERLIN: I'm not surprised by this but I was just wondering. As a
20 follow-up I would like to ask, who facilitated the sessions? I know in the third session
21 you mentioned the Board for the AVMA managed part of the session and members of the

1 Committee or your Council managed part but in the earlier sessions who were the
2 facilitators?

3 MR. PASCOE: We contracted with professional facilitators. Can I just --
4 the strategy there was to really have a listening session and not to get into some sort of
5 contentious debate about the specific issues but regulate the opportunity for people to
6 comment. There was specific ground rules that were set at the beginning in terms of the
7 length of time the people could speak and the opportunity to provide it.

8 MS. DERLIN: Thank you very much.

9 MS. PHILLIPS: Frank?

10 MR. WU: So I have a question about your parent entity. As you noted
11 since your programmatic you need not be separate so there's no issue if your views
12 coincide with or don't coincide with or are directed by the bigger structure. I'm just
13 curious what is the parent structure's view of these work force issues?

14 Do we have too many, that's too view, the optimum number -- does it
15 have a policy of any type or position, does it have any view at all and it's just a question
16 you should infer nothing about whether I should have a view or what view that is, I'm
17 just wondering do they have a view and if they do what is their view of the number and
18 the compensation level out of these work force issues?

19 MR. PASCOE: So just to be clear you are asking what the view of the
20 American Veterinarian Medical Association is -- I'm going to let John field that one. But
21 while he is thinking about his comment I will say that that varied emotion just like
22 everything else in higher education is suffering from increasing costs of tuition, there is

1 substantial concern within the profession and has been for some period of time and
2 several months ago there was a national summit held at Michigan State University with
3 representatives from across the profession including industry and government academia,
4 student representatives, recent graduates and it was a two day summit that was
5 specifically organized to address how we as a profession and the Council was represented
6 there as well can tackle this issue.

7 And it focuses around debt to income ratio and that's the real concern
8 about whether this is this sustainable in the long-run and I would offer that we are not
9 unique amongst professions in that regard but I am proud of the fact that as a profession
10 we are tackling this and all segments of the profession came together and there is an
11 action plan that is being developed out of that and part of that action plan actually
12 includes the Council in terms of looking at ways to empower students to have better
13 understanding -- financial literacy, other tools that can help them in terms of managing
14 their financial load while they are trying to achieve their education.

15 MR. SCAMAHORN: Good job. You said John that is where I was going
16 to go with it but the AVMA itself has added a division of economics and have a director
17 and they are doing studies and driving this work force issue and net to income ratio.

18 MS. DERLIN: I would like to pursue a little bit more some of this
19 diversity of opinion about things that you have going on. In reviewing the material,
20 reviewing some of the comments that were submitted in writing I am not entirely clear if
21 this is very much focused on a single institution or if it is very much focused on a number

1 of institutions that use a different means of delivering its curriculum and pursuing the
2 study -- field of study.

3 Or if it is about specifics of the curriculum and maybe it is all of the above
4 but can you just facilitate my understanding of the issue a little bit from your perspective?

5 MR. PASCOE: I think your characterization is reasonable and there are a
6 number of issues but clearly one of them, one of the magnets if you will is that in 2008 I
7 believe it was the last veterinary program to be accredited in the U.S. was accredited and
8 that particular university uses a distributive clinical model for its clinical training and so
9 it is unique amongst the 28 schools that are currently accredited in the U.S. for its clinical
10 training model and while this is the distributive clinical model is something that is used in
11 other health professions this is the first time it is being -- was -- is used and is currently
12 used in veterinary medicine and there are people that disagree with that educational
13 model.

14 MS. DERLIN: Thank you and I would like to -- sorry go Frank.

15 MR. WU: Just broadly speaking I don't need any precision but just
16 generally what are the trends in terms of your applicant pool is it stable, going up, going
17 down, what's the demand these days and what's the enrollment trend? Going up, going
18 down or stable -- I'm just trying to get a sense.

19 It's been a while since the school opened but what is the overall picture for
20 your field?

21 MR. PASCOE: So let me take a run in a couple of directions. We have
22 two new schools that are developing that the Council is working with in the U.S. We

1 have a third one that has recently initiated that process. The overall applicant pool is
2 relatively static so that's on that side of it. On the other side of it we -- there was a clear
3 dip during the financial recession or financial crisis and there were concerns -- legitimate
4 concerns I think at the time about whether there was an over-supply of veterinarians. I
5 can tell you that in the last two years that's changed dramatically.

6 As one objective metric the AVMA's career center has seen an increase in
7 the number of jobs and a decrease in the number of people available to apply for those
8 jobs and I think those of us in academia have -- we are back to a point before the
9 financial crisis where we are getting calls from veterinarians saying they can't find new
10 graduates to employ that there is not sufficient.

11 MR. WU: Just one more question -- this is just for my own curiosities so
12 that I have an accurate picture of your profession. When I think of that I think of the one
13 that I take my dog Bebe to see but I recognize your field is vast, it includes academics,
14 researchers, it includes people working in agriculture and with large animals et cetera.

15 Just so I understand the vet that I go see that's what half, 80%, 20% just a
16 ballpark what does that constitute of your overall profession just so I understand.

17 MR. PASCOE: Don't quote me on this but in general terms I think
18 companion animal practice represents about 70% seven - zero yes.

19 MS. PHILLIPS: Bobbie, are you done for now? Other member
20 comments I have Hank?

21 MR. BROWN: Doctor it is nice to have you here. I guess all my life I
22 have heard of the outstanding work that Davis does.

1 MR. PASCO: Thank you.

2 MR. BROWN: So it's great that you take time to serve your profession.
3 For many, many years I have talked to students who have extraordinary outstanding
4 academic records who can't get into veterinarian medicine school. Many with straight
5 A's who were turned down and then go on and get a Master's in biology or chemistry or
6 related field hoping that will get them in and many of them don't get in.

7 Maybe the people I've talked to are the exception but my impression is
8 that you have far more applicants for veterinary medical school around the nation than
9 you have openings. What's the problem? Obviously the exam -- you have a high rate of
10 passage so that's not the barrier, what's the barrier? Do we have not enough openings for
11 veterinary medicine or are you short of positions in school?

12 MR. PASCO: That's a really good question. I think if you look at the fact
13 that the number of applicants is being static for some period of time I guess that's one
14 side of the equation I mean I can answer that from a California specific perspective and
15 that would at least serve the state and the nation in terms of population for seats for
16 veterinarian medical education.

17 There's only the one school in the U.C. system. There's a second school
18 that's a private school in Southern California and despite the fact that both of those
19 schools preferentially take California residents, more than 100 California residents are
20 admitted into the other 26 veterinarian schools in the United States annually probably
21 because of their academic qualifications, probably because there are no more seats in
22 California.

1 And California as net importer has been in the 40 years I've been in
2 California of veterinarians to the states we train less than a third of the newly licensed
3 veterinarians each year.

4 MS. BROWN: Is it a failure to fund the veterinarian medicine schools or
5 are people who want to offer veterinary medicine turned down, what's the problem?

6 MR. PASCOE: I really don't know how to answer that question. I mean
7 veterinarian education is expensive there's just no question it's no different than -- in fact
8 in some respects it's probably more expensive to train veterinarians than to train
9 physicians.

10 MR. BROWN: You get fewer patient complaints I guess.

11 MR. PASCO: Fortunately we don't have to deal with the level of
12 litigation that physicians do.

13 MS. PHILLIPS: Other member questions for the Agency at this point.
14 Okay thank you we are going to move to the third party comment at this point and we
15 will be inviting you back for further comment. Our third party commenters I am going to
16 just give you a -- invite the first speaker to the table and let you know who is on deck.

17 We have several commenters the first commenter is Carl Darby with
18 Sheila Allen on deck. Is Carl Darby here? Sheila Allen is here as she is approaching the
19 table the rules around third party comments are that you have three minutes to speak. We
20 do have a timer and the little box in front of you will bleep at you when you have reached
21 your three minutes.

1 When you speak please make sure that you have pressed the button and
2 the mic is on. We may have questions for you after you speak so our speaker here is
3 Sheila Allen welcome thank you for joining us.

4 MS. ALLEN: Thank you for the opportunity. I'm Sheila Allen I am --
5 and have been a faculty member at the University of Georgie, College of Veterinarian
6 Medicine for the past 30 years. I'm a Board certified specialist in small animal surgery.
7 I served for 8 years as Associate Dean for Academic Affairs and has the honor or serving
8 as Dean from 2005 until the present.

9 I served on the Council in Education for 6 years and served as Chair for
10 one year and I currently serve as a site visitor and I have participated on 14 different site
11 visits over the last 10 years. I strongly endorse the COE as the accrediting agency for
12 veterinary medical education.

13 Based on my experience both as a Council member and as a site visitor I
14 can verify that the standards are rigorous and applied fairly on all institutions seeking
15 accreditation. The measures of achievement in veterinarian medical education such as
16 the licensing examination scores, graduation rates, employment rates and employer
17 satisfaction all verify that graduates of all accredited schools in the U.S. are well educated
18 and practice ready regardless of the educational model used.

19 The COE has accepted input from NACIQI and from its stakeholders and
20 responded to that input. For example, changing the method of appointment of members
21 and separating COE members from the site visit process. At no point during my service
22 on the COE did I detect any interference of influence from the AVMA leadership.

1 Nevertheless in an effort to remove even the perception of conflict the
2 COE no longer allows the AVMA leadership to observe activities and meetings or in site
3 visits. The COE is affiliated and subsidized by the AVMA and the AVAMC and this is
4 true for accrediting agencies from multiple health professions.

5 There is a balance among veterinary educators, private practitioners and
6 the public members on the COE and this provides a broad perspective on current societal
7 needs for veterinarian medical services. The changes made by the COE in response to
8 suggestions from the NACIQI staff and the profession stakeholders demonstrate the
9 COE's willingness to accept input and to change its procedures accordingly.

10 I am confident that the COE will continue to be receptive to this input and
11 modify its procedures. In addition to my own testimony I have with me letters of
12 endorsement from the Georgia and South Carolina State Veterinarian Associations that I
13 would offer for the Committee's consideration.

14 Both state associations support the COE being recognized as the accreditor
15 for veterinarian education, thank you.

16 MS. PHILLIPS: Thank you very much. Questions for this speaker?
17 Thank you for joining us. The next speaker on the list is William Tyrrell with William
18 Kay on deck. Welcome, thank you for joining us.

19 MR. TYRRELL: Thank you for having me. Dr. William D. Tyrrell and I
20 have received my DVM from Virginia Tech, the Virginia College of Veterinarian
21 Medicine in 1992 and became board certified by the DACVIM in 1999 in the specialty of
22 cardiology.

1 I am actively involved in organized veterinary medicine as the past
2 President of the Virginia Veterinary Medical Association, a past President of the Virginia
3 Maryland College of Veterinary Medicine Alumni Society and a past delegate for the
4 Commonwealth of Virginia in the AVMA House of Delegates as well as a member of
5 Ref Com 3 whose oversight was education within the AVMA House of Delegates.

6 I am also a majority owner of CBCA Cardiac Care for Pets, the largest
7 cardiology specialty practice within the nation and the world and the co-founder of the
8 Life Center, the mid-Atlantic's largest specialty hospital. With my past and present
9 professional experience I do feel qualified to address the concerns that have surfaced both
10 past and present with the AVMA COE in particular the quality of cardiac graduates
11 throughout the country.

12 My practice has a variety of senior students, interns and externs that rotate
13 through all 10 of my offices. We are also an ACVM approved residency training
14 program with 100% pass rate of the cardiology certifying examination since its inception.
15 We have the personal opportunity to observe hundreds of students over the past years
16 including students that arrive from the Caribbean veteran's schools as well as schools that
17 do not have a traditional teaching hospital as has been referenced previously.

18 This offers us significant time to evaluate the students with spending 5
19 days a week for 2 to 3 weeks at a time. This gives us unique insight into each individual
20 student and graduate's clinical knowledge, clinical techniques and their ability to
21 communicate with both me and the client. I am here to tell you that our current students

1 and graduates are not deficient in any capacity as it relates to medicine and/or cardiology
2 and they are likely a hell of a lot smarter than I was when I graduated in 1992.

3 One of our incoming residents is from the Caribbean school and she stood
4 head and tails above the rest of our candidates and these are the top basically 0.1 percent
5 of the graduates that obtain cardiology residencies within our country.

6 Arguments have been made that the COE inappropriately accredited such
7 schools without what others deem appropriate and traditional teaching hospitals.
8 Veterinarian education is changing and will continue to change. We all feel we had it
9 tougher than the previous generation, we all feel we walked uphill both way to vet
10 schools.

11 The COE has had the insight to appropriately accredit these schools and I
12 am certain other schools will follow in these footsteps. Others have argued that nearly
13 accredited schools will create a surplus of veterinarians. I receive calls on a weekly basis
14 of primary care practitioners looking for new associates.

15 At least in this region there is a shortage of veterinarians. If I could hire
16 10 boarded cardiologists tomorrow I would. With these comments in mind I urge the
17 U.S. Department of Education to fully recognize the AVMA COE as the accrediting body
18 for veterinarian colleges and education, thank you.

19 MS. PHILLIPS: Thank you questions, Frank?

20 MR. WU: What in your view accounts for the hostility of some of your
21 colleagues to the COE?

1 MR. TYRRELL: To be honest with you I am not quite certain. I do know
2 that there was some argument over the AVMA's Board of Directors distancing
3 themselves from the COE. As a member of the HOD as well as Rough Com 3, 3
4 resolutions came before our Committee, all of those were soundly defeated by the HOD.
5 Those resolutions intended to either disband or put a moratorium on accreditation of the
6 COE and I personally am satisfied with those fire walls that have been put in place.

7 I think economics also drives some things through a recession there are
8 certainly some areas of our country that haven't recovered and I believe some of that has
9 been perceived as an oversupply of veterinarians is also driving this matter.

10 MR. WU: Alright just one more question. Is there a geographic issue
11 where vets are located -- in other words are there some areas with more and some with
12 not enough?

13 MR. TYRRELL: Certainly there are areas of the country that are under-
14 served with veterinarians just as in human medicine or dentistry. Certainly both coasts of
15 our nation all around all the capitals within the United States but if you go to
16 northwestern Montana yeah they are probably under-served. If you go to southern West
17 Virginia, they are probably under-served as well.

18 But certainly geographic areas like we are in right here we have a
19 shortage.

20 MS. PHILLIPS: Any further questions for this speaker? Thank you very
21 much for joining us.

22 MR. TYRRELL: Thank you ma'am.

1 MS. PHILLIPS: Our next speaker is William Kay with Paul Pion on deck.

2 MR. KAY: Good morning I have about 4 quick points.

3 MS. PHILLIPS: Welcome.

4 MR. KAY: Thank you. One is that the Secretary's criteria and the criteria
5 for recognition U.S.D.E. part 602 are not really evaluated by the Council of Education.
6 As a former Council member I was one of the two Council members removed as opposed
7 to the second Council member who successfully appealed the removal but is now a re-
8 instated Council member however she is only really half on the Council and half not on
9 the Council because she has been prohibited from having anything to do with foreign
10 veterinarian school accreditation and other issues.

11 42% of the last 6 years the Council on Education activity has been with
12 foreign schools, 42%. So the reinstated former removed Council member is really almost
13 half on and half off, that seems to be very unusual but I think the gag order that she had
14 to sign like the gag order I was asked to sign which I did not sign is an issue.

15 The second is the distributive model of veterinarian medicine beginning in
16 California, southern California, Western University of Health Sciences, College of
17 Veterinary Medicine of which I was offered a job continues to be not compliant with the
18 Council on Education's criteria or standards of accreditation. What does that mean?

19 Formerly Western University had hundreds of sites they narrowed that
20 down to 51 so-called core sites. But the core sites in the policies and procedures manual
21 of the AVMA Council Education must meet the standards of accreditation. Most of the

1 core sites are veterinary practices and most of those sites do not conduct research which
2 is a standard of accreditation.

3 So by definition Western University ought not to have been accredited.
4 There have been comments as to whether those of us who are critics and I am of course
5 one, we have never made a comment about the quality of any individual or any group of
6 individuals from Western University, end of story on that point.

7 When I was on the Council the renewal petitions, particularly the one in
8 2006 was conducted and handled strictly by the AVMA staff. Council members were not
9 in any way involved. We didn't see the report, we had no participation in the preparation
10 of the report and we were not invited to go to Washington and make a presentation to
11 NACIQI the sole person who did which is in the NACIQI transcripts was an AVMA staff
12 member.

13 And that was the same staff member who also conducted the transcripts
14 alone in previous renewal petitions prior to 2006.

15 MS. PHILLIPS: Yes that concludes your 3 minutes but I will invite the
16 Committee to ask any questions they may have at this time.

17 MR. WU: Just one brief question what is the gag order that you were
18 asked to sign?

19 MR. KAY: I guess that's a legal term, I'm not an attorney that in order for
20 the second removed Council member, Dr. Mary Beth Leininger, the first female AVMA
21 President had to sign an extensive document. The reason I know that is that I know that I
22 have seen the document -- that it was very confidential but it was extensive.

1 It was the same basic document that I was asked because we both had the
2 same attorney. And so what she can and cannot do must be in that document but what I
3 do know is that in the last 6 years 42% of all of the visits to veterinary schools and
4 therefore of the activity of the Council is foreign -- from foreign colleges.

5 And it's been said I think twice this morning that we are talking about the
6 U.S. schools but there are 5 Canadian schools which are accredited by the AVMA
7 Council of Education and 14 foreign schools and 8 or 10 additional veterinarian schools,
8 several of them are foreign schools in the pipeline where they are called -- they are
9 interested in being accredited, Poland, South Korea, others in the Caribbean and so forth.

10 MS. PHILLIPS: Further questions for this speaker, thank you very much
11 for joining us.

12 MR. KAY: Thank you.

13 MS. PHILLIPS: Next on our list is Paul Pion with Jeffrey Newman on
14 deck, welcome.

15 MR. PION: Thanks for having me. Regarding criteria that concern
16 NACIQI in December 2014 the AVMA has worked hard to appear in compliance. I and
17 many veterinary colleagues remain unconvinced. Addressing criteria in 6.02.13
18 acceptance by others -- the COE held listening sessions at several national meetings.

19 These meetings were poorly organized, poorly advertised and poorly
20 attended. They did not succeed in allowing COE to hear or address the concerns of many
21 in the profession. AVMA has publicized changes to address 6.02.15.A6 clear and

1 effective controls against conflicts. These changes do not materially diminish the control
2 that AVMA has over the COE.

3 AVMA still has significant control of the selection and budget of COE and
4 fiscally limits the COE access to independent counsel. Case in point during a meeting
5 with AVMA leaders recently where we were discussing separation of COE from AVMA
6 one of the Readers asked me why they would continue to finally support COE if they had
7 no control over it.

8 Until the COE is independent of AVMA governance and budget
9 constraints they can't comply. The most substantial changes that COE has made address
10 6.02.21 standard methods and procedures. COE is the modified standard 10 research
11 programs and standard 11 outcomes assessment.

12 I applaud these modifications but it is too early to determine if they will be
13 enforced and have the intended impact upon the institution COE accredited under the last
14 or prior standards.

15 Finally to re-inforce my position that AVMA's case is unconvincing and
16 superficial I want to address the removal and reinstatement of Council member Dr. Mary
17 Beth Leininger of the COE. I was present at Dr. Leininger's appeal hearing serving as
18 her non-legal counsel. Of course they wouldn't allow her to have legal counsel. I saw
19 the COE leadership display utter disdain towards Dr. Leininger for daring to express her
20 concerns regarding COE at the AVMA meeting and during the last NACIQI hearing.

21 Dr. Leininger is driven by a desire to serve her colleagues, profession and
22 the guidelines set up by the Department of Ed. Her concerns are a matter of record from

1 the 2014 NACIQI hearing. Despite AVMA and COE's public relations campaign to
2 convince the profession and NACIQI that all wrongs have been righted it is clear that Dr.
3 Leininger's concerns with AVMA and COA have not been adequately addressed.

4 This Committee should also be aware that Dr. Leininger's reinstatement
5 came with conditions. She may not participate in any of the discussions or decisions
6 regarding foreign accreditation and is forbidden from publicly voicing concerns regarding
7 the COE.

8 These conditions set a dangerous precedent especially when over 40% of
9 the schools currently under review are foreign. In my opinion that Dr. Leininger's
10 reinstatement was a skillful political maneuver and viewed it as the very nature of
11 AVMA's control of a COE that gave AVMA leadership to decide if Dr. Leininger should
12 be allowed back on the COE and under what restrictive terms.

13 MS. PHILLIPS: Let me pause you there thank you. Any questions for
14 this speaker? Thank you very much for joining us.

15 MR. PION: Thank you.

16 MS. PHILLIPS: Our next speaker is Jeffrey Newman with Frank Walker
17 on deck, is Jeffrey Newman here, yes -- Frank Walker is on deck. Thank you very much
18 for joining us.

19 MR. NEWMAN: My name is Jeff Newman I am a veterinarian, I am a
20 general practitioner here in the northern Virginia and Maryland region. I am a past
21 President of the Virginia Veterinarian Medical Association. I am speaking on their
22 behalf as well. I am an owner in an 8 practice group and I employ over 30 veterinarians

1 10 of which that come from schools that are in question. I would argue that the quality of
2 veterinary medical education is at probably the highest it has ever been.

3 I agree with what Dr. Tyrrell said in that the students nowadays are
4 coming out being I think much more equipped to handle the challenges and practice than
5 they ever have been and I believe the COE has been in part responsible for that. So as I
6 am trying to wrap my head around what the concerns are surrounding this I respect all of
7 my colleagues I mean we actually have I believe the greatest profession on earth.

8 And this profession certainly has challenges. I believe the hallmark of the
9 great organization is one that is willing to embrace change and I believe the AVMA has
10 certainly worked hard to try to embrace the concerns and changes that were requested in
11 2014.

12 I believe that economics are a big drive for what the concerns are here and
13 I appreciate Mr. Wu's questioning early about that I think that really gets -- for me to the
14 heart of what I think the concerns are and I don't think that the COE should be held
15 responsible for being the gate-keeper for the economics.

16 I would ask that you please accredit the AVMA COE and I believe that
17 they deserve that, thank you.

18 MS. PHILLIPS: Thank you very much, questions for this speaker? I have
19 one. You mentioned in your practice that you employed 10 vets from the institutions in
20 question. What institutions are you referring to?

21 MR. NEWMAN: Different veterinary schools that have been accredited
22 from some of the countries outside of the United States.

1 MS. PHILLIPS: Thank you.

2 MR. NEWMAN: Thank you.

3 MS. PHILLIPS: Other questions, Frank?

4 MR. WU: I'm curious the vets that you have hired who attended school
5 outside the U.S. are they A -- Americans who went abroad or B -- foreigners who came
6 here or both?

7 MR. NEWMAN: Most of them are Americans that went abroad but I
8 have had some that are foreigners who have come here so.

9 MR. WU: So the foreign schools are attractive to Americans and there are
10 Americans who would travel outside of the U.S. to get their DVM?

11 MR. NEWMAN: Absolutely. I mean there are limitations on the number
12 of students that are able to get into the schools here in the United States and a lot of them
13 do choose to go outside of the country.

14 MS. PHILLIPS: Art?

15 MR. KEISER: I just have to say this. I have four dogs, three Boxers and
16 a Maltese. I regularly support my local veterinarian much more than I would like to and
17 consequently I would like to see more competition so I applaud the work that you do and
18 the work that my veterinarian does for my dogs but I would like to see more competition
19 and lower prices and somehow to get some insurance because it costs a lot more to take
20 care of my dogs than it does for me.

21 MR. NEWMAN: I'd like to invite anyone to come over to my practice
22 which is walking distance from here. You can meet two of these veterinarians in

1 question and I'm sure they would be able to answer any questions you might have, thank
2 you.

3 MS. PHILLIPS: Thank you very much. Our next speaker is Frank
4 Walker with Arnold Goldman on deck. I don't see Frank Walker, Arnold Goldman? So
5 we have Arnold Goldman and Deborah Kochevar on deck. I'm guessing that you are
6 speaking on behalf of Arnold Goldman, welcome.

7 MS. KOCHEVAR: Thank you Dr. Goldman sent a letter and his
8 testimony to me. I work with him because my school that I work at is in the same region
9 so Dr. Goldman was scheduled to testify on behalf of the Connecticut Veterinary Medical
10 Association in support of the AVMA COE unfortunately his father-in-law died on June
11 22nd and the funeral is today at 3 p.m. and so he very much regrets not being here. And
12 with your concurrence I will read his testimony.

13 MS. PHILLIPS: Yes that's fine.

14 MS. KOCHEVAR: Thank you. Dr. Goldman says thank you I represent
15 the 725 member Connecticut Veterinary Medical Association Professional Society of
16 Practicing Veterinarians which includes both employers and employees, graduates of
17 every Council and educational accredited veterinary school practice in Connecticut.

18 I am a graduate of the University of Florida -- College of Veterinary
19 Medicine and the University Of Minnesota School Of Public Health. I have practiced
20 veterinary medicine for 30 years and hold licenses to practice in Connecticut, Florida,
21 Massachusetts and New York. I am past-President of the Connecticut VMA, the New

1 England VMA and the National Alliance of State Animal and Agricultural Emergency
2 Programs.

3 I have also represented Connecticut to the AVMA in multiple roles. My
4 comments address Accreditation Standard 6.02.13 acceptance of the Agency by others an
5 area in which I consider myself well-qualified to comment. I have 4 points to make.

6 1 -- There are approximately 105,000 veterinarians in the U.S. and 89,000
7 fully 84% are AVMA members. In contrast the American Medical Association claims
8 less than 25% of physicians as members. Clearly AVMA is a generally respected
9 professional society.

10 Point 2 -- an AVMA Committee has accredited college of veterinary
11 medicine for decades and was among the first DOE recognized accredited agencies.
12 Throughout these decades veterinarians have competently served the public, are
13 acknowledged in the popular media as among the most respected professionals and
14 critically there has been no up-swell of complaints for malpractice of incompetence, such
15 cases remain rare.

16 Point 3 -- practice owners employers hire and retain thousands of new
17 graduates yearly. Tens of thousands of graduates have been hired yet there is no wave of
18 dissatisfaction among employers. Entry level veterinarians must grow in their skills as is
19 expected. One does not graduate nor is one expected to graduate as a seasoned clinician -
20 - that takes time in any profession.

21 Point number 4 -- the inclusion of practitioners on the Council in
22 Education insures that employers and graduates have matched expectations. This aspect

1 is critical to maintain the relevance of a veterinary education to the actual work most
2 graduates are expected to perform.

3 Exposure to bench science and the scientific method are important but
4 professional success depends on learning applied science closely matched to the duties to
5 be performed. Inclusion of practitioners in significant numbers is an important reason
6 why COE enjoys such widespread acceptance by our profession.

7 MS. PHILLIPS: Thank you very much, any questions for the speaker's
8 representative? Thank you very much for joining us.

9 MS. KOCHEVAR: So now can I join as myself?

10 MS. PHILLIPS: You can this is now Deborah Kochevar with Jerry
11 Owens on deck.

12 MS. KOCHEVAR: Thank you so good morning. My name is Deborah
13 Kochevar, I am Dean of the Cummings School of Veterinary Medicine at Tufts
14 University in Massachusetts. Tufts is the only school of veterinary medicine in the 6
15 state New England region. Prior to my current position at Tufts I spent over 20 years as a
16 faculty member at the College of Veterinary Medicine and Bar Medical Sciences at
17 Texas A&M University.

18 I have served as President of the Association of American Veterinary
19 Medical Colleges, the AAVMC and the American College of Veterinary Clinical
20 Pharmacology. I am a past member and Chair of the AVMA Council on Education. I am
21 speaking today on behalf of the AAVMC and here in the audience today is another

1 AAVMC colleague, Associate Executive Director of Institutional Research and Diversity
2 Dr. Lisa Greenhill.

3 It is the AAVMC's belief again, AAVMC is an organization that
4 represents all of the accredited schools in the U.S. -- it is our belief that the COE is
5 broadly accepted throughout the educational community and widely recognized as the
6 most appropriate accrediting agency for academic veterinary medical programs.

7 The COE applies the standards of accreditation in a manner that insures
8 that accredited colleges and schools of veterinary medicine produce qualified entry level
9 veterinarians. We believe the composition of the Council provides broad perspective,
10 promotes reason discourse and results in carefully considered decisions regarding
11 accreditation of veterinary colleges.

12 As Dean of an AVMA COE accredited college I interact with numerous
13 practitioners each year at national conferences, at alumni events and I also review data
14 collected from employer surveys. Practitioners are satisfied that the COE standards
15 address relevant knowledge, skills and clinical competencies and they are largely happy
16 with the level of preparation that they find in new graduates.

17 And again our unemployment rate is very, very low. Many refer to COE
18 accreditation standards with pride and rightly observe that our system of accreditation has
19 set global gold standards for veterinary medicine. As evidence of that respect in support I
20 am also speaking today on behalf of a Massachusetts Veterinarian Association and the
21 Maine Veterinarian Medical Association and I have letters from both of those groups.

1 These groups with well over 1,000 members collectively expressed to this
2 Committee in 2014 their support for the COE. They continue to believe that the COE is
3 broadly accepted throughout their membership as the appropriate accrediting Agency of
4 veterinary medicine. They believe that high COE standards promote quality graduates
5 who meet the needs of the public and their animals and again you heard from Dr.
6 Goldman via me that the Connecticut VMA feels the same way.

7 One of the important demonstrations of that is the emphasis that the COE
8 has put on outcomes assessment in recent years and that's become a critical evaluation at
9 the level of the schools and there has been a great deal of effort by our faculty in
10 demonstrating that we do that well.

11 I would also note as has been noted recent changes instituted by the COE
12 have demonstrated to me and to others that the Council is responsive in leading positive
13 growth in veterinary education. It is a standard's driven and an evidence-based process.

14 MS. PHILLIPS: Thank you very much, questions for this speaker? Thank
15 you very much for both of your comments. Our next person on the list is Jerry Owens
16 with Seth Koch on deck. Thank you for joining us if you could press the button, there
17 you go.

18 MR. OWENS: Good morning I am Dr. Jerry Owens a 1971 graduate from
19 the University of California Davis Veterinary School and a diplomat at American College
20 of Veterinary Radiology and I have been in private referral practice in the San Francisco
21 area since 1976. During that time I have provided referrals especially and consultation

1 services to over 1200 veterinary hospitals and more than 10,000 veterinarians in the last
2 40 years and I worked with graduates from the veterinary schools throughout the world.

3 I have observed a significant decline in the observed clinical skills and
4 clinical knowledge of any veterinary graduates -- new graduates. Most severe in the last
5 10 to 15 years and most often in veterinarians you graduated from veterinary schools
6 without on-campus teaching hospitals.

7 It is my feeling that a veterinary student should be exposed to a veterinary
8 hospital throughout his or her four years of training as part of a well-rounded education
9 that would include animals with routine and difficult clinical illness at the same time
10 being exposed to a variety of specialists, researchers et cetera.

11 I was fortunate to have graduated from Davis where I was exposed to
12 many different animal species, specialties and research which had a significant impact on
13 my career as a practitioner and as a specialist and in my voluntary participation of many
14 clinical research studies which ultimately resulted with the production of two textbooks
15 and many scientific articles.

16 I implore you to reconsider the processes used by the COE to accredit
17 veterinary schools that are available to U.S. citizens that basically don't have teaching
18 hospitals. It is inappropriate that the COE in part should be even directly associated with
19 the AVMA. And I would also like to add a couple more points -- about half of the
20 NACIQI members here today are new since the last time that there was a hearing on this
21 subject with the AVMA as the only approved scientific accrediting body were before
22 then.

1 From what I can gather so has the staff person for your Committee -- thus
2 those of us who are here today believe that we need additional time to revisit the prior
3 COE deficiencies and make everyone on the Committee aware that many still exist. In
4 fact we are convinced that they have not been handled sufficiently to be granted full
5 status as the profession's only accrediting body without further action.

6 In December 2014 there were over 900 comments submitted. This time
7 there are far fewer. In part because we didn't ask for them however this smaller number
8 of participants testifying today with two more or so to come focused on specific and
9 provable violations to the Code of Federal Regulations. I have some more to talk but I
10 don't have time I guess so --

11 MS. PHILLIPS: Thank you very much. Let me ask the Committee if
12 anybody has questions for this speaker, Hank?

13 MR. BROWN: Are you noticing a decline in capability in large animal
14 practice or small animal practice or both?

15 MR. OWENS: Mine -- small animals.

16 MR. BROWN: And has there been a drop off from the number of
17 accredited institutions that have teaching hospitals?

18 MR. OWENS: No there is an increase.

19 MR. BROWN: There is an increase?

20 MR. OWENS: In the ones that have been certified in the last 15 years are
21 all without teaching hospitals. Well I can say I can think of four in the wings.

1 MR. BROWN: Yes I was trying to correlate the decline in capability that
2 you have observed with the number of teaching hospitals but the number of teaching
3 hospitals has gone up?

4 MR. OWENS: Well the newer veterinary schools that have been
5 accredited don't have teaching hospitals.

6 MR. BROWN: I see.

7 MR. OWENS: But this isn't just those veterinary schools. I mean I can
8 get off on a tangent -- it's not just from those schools. What I see as graduating sub-
9 optimal veterinarians it is everywhere but it is worse in my opinion in the schools that do
10 not have these students exposed to the hospital while they are going to school. I just
11 think it is really wrong.

12 MS. PHILLIPS: Other questions for this speaker? Thank you very much
13 for joining us.

14 MR. OWENS: Oh you are welcome thank you.

15 MS. PHILLIPS: My speaking list includes next Seth Koch -- seeing not
16 that Eric Bregman, Walter Robinson, Mark Johnson -- I'll need you to introduce yourself
17 when you sit down. You press the button there you go.

18 MR. ROBINSON: Thank you. I want to thank everyone for allowing me
19 this time to speak to you. I'm Walter Robinson. I'm just a little insignificant veterinarian
20 well actually I'm a veterinarian from South Carolina and have been for 40 years. The
21 first order of business would be I request a little longer time to give you my remarks as I
22 have from South Carolina and I can't talk as fast as you and your colleagues.

1 And with all due respect to my esteemed colleagues from other areas of
2 the country I disagree with some of their conclusions. I have been a representative from
3 the South Carolina Association of Veterinarians where I served on the VMA House of
4 Delegates for 18 years. And during my time in that capacity I observed the following:

5 Perpetual process by which members of the AVMA House of Delegates
6 respect to stay quiet, not ask controversial questions if they are aspired to receive
7 considerations for high-level responsibility. Since being appointed or elected to other
8 committees and Councils such as the Council on Education -- if the AVMA member did
9 not aspire to that road and follow the AVMA guidelines and expectations they would
10 rarely ever arrive at a position where they could be nominated or elected by the House of
11 Delegates to the Council of Education.

12 In recent years as proper accreditation of veterinary schools has occupied
13 ever-increasing amount of time for the delegates with the ever-increasing confusion and
14 controversy among the licensed veterinarians in my state. One main question from my
15 South Carolina colleagues is, why does the AVMA accredit foreign veterinarian schools?

16 In my opinion the AVMA has obfuscated the responsibility that the
17 Department of Education requires of them to create an independent Council on Education
18 that focuses on the quality of education for today's graduating veterinary students.

19 The accreditation process should be totally separate from the AVMA. It
20 would be best served by another group such is the American Association of Veterinary
21 State's Boards which has no bias or agendas.

1 As an AVMA member I appreciate the efforts they have done to fill the
2 needs of a wide variety of members of the organization. Hell I'm convinced that the
3 COE and the veterinary profession need a great deal of additional transparency before the
4 COE can fully understand the Department of Education rules and policies and thus
5 becomes unable to fill its role as the only accreditor of veterinary schools in the United
6 States and abroad without conflicts of interest, thank you so much even without more
7 time, thank you any questions?

8 MS. PHILLIPS: Thank you, questions for this speaker?

9 MR. ROBINSON: Thank you for allowing me to give my opinion.

10 MS. PHILLIPS: Thank you very much for joining us. I have next Mark
11 Johnson with John Sexton on deck. Mr. Johnson -- thank you for joining us.

12 MR. JOHNSON: Thanks for having me. Good morning my name is
13 Mark Johnson I am a 1969 graduate of the School of Veterinary Medicine of Ohio State
14 University. I have been practicing full-time for 47 years. I am in my first year of serving
15 a 4 year term on the Virginia State Board of Health and in my 6th year of an 8 year term
16 serving on the Virginia Board of Veterinary Medicine having previously served as
17 President.

18 I have also been active in the Virginia Veterinary Medical Association and
19 other activities throughout my entire career. I have started the Pender Veterinary Center
20 with my partner Don Powell a Cornell graduate the same year '69 in 1971. We have
21 since grown it into a 30 veterinary practice, 30 DVM veterinary practice. It is a non-

1 specialty practice, a general practice 24 hour emergency which includes a specialty
2 exotics program.

3 We serve about 40,000 patients per year and I could only go back to 2005.
4 I've hired 76 veterinarians and in the 45 years it is well over 150 veterinarians. We are
5 proud to have mentored so many young veterinarians. Several have gone on including
6 Bill Tyrrell that you heard from to become specialized in veterinary cardiology, research
7 and NIH teaching institutions and personally I'm very proud -- like a proud father to
8 reflect on that subject.

9 As a practice we send off to the veterinary schools two to three students a
10 year to become educated in veterinary medicine. We also send off three to four to
11 become licensed veterinary technicians and we support them with their tuition. We also
12 take in approximately 24 to 30 students a year from students who are in their third and
13 fourth year of clinical rotations doing 2 to 4 week blocks in our hospital and as a result
14 after all of these years which has gone very rapidly I have been very pleased with the
15 quality of education being exemplified by the veterinarians we have interviewed and
16 hired who were trained in the United States.

17 We have also hired students from the island schools the accredited
18 veterinarian schools St. George's and Ross and specifically because they seem to have a
19 strong foundation in exotic veterinary medicine than non-traditional dog and cat practice.
20 They seem to be just as well prepared academically and clinically and are prepared for
21 the veterinary entering the veterinary work force.

1 As both a practitioner and employer of veterinarians I believe strongly in a
2 rigorous and yet fair accreditation system of academic veterinary medicine as well as a
3 clinical training in order to insure consistency in the standards of education.

4 Veterinarians as they proceed down the road towards licensure the accreditation process
5 of the COE in my opinion has done an outstanding job in ensuring the quality of
6 education of students as they receive their education.

7 The system has worked well for a very long time. I personally have not
8 seen a decrease in the quality of the students and there is no over-supply in our words for
9 veterinarians in the country.

10 MS. PHILLIPS: Thank you very much questions for this speaker? A
11 question that I had just to clarify you mentioned that you support a number of students
12 going to vet school and to vet tech school by paying their tuition did you pay that?

13 MR. JOHNSON: We support and mentor those going to veterinary school
14 that is a very expensive education. We have a 501C3 corporation to help because there is
15 a deficiency of licensed veterinary technicians to support veterinary practitioners so we
16 help them and I am proud of that also.

17 MS. PHILLIPS: Thank you, thank you for joining us.

18 MR. JOHNSON: Thank you.

19 MS. PHILLIPS: Our next speaker is John Sexton with Jim Wilson on
20 deck. Welcome thank you for joining us.

21 MR. SEXTON: Thank you for the opportunity to participate in this
22 Committee meeting today and to present my views. I'm a graduate of the University of

1 Georgia College of Veterinary Medicine class of 1978. I have been in private practice
2 continuously from the week after my graduation until present. During this time period I
3 have been involved in local and state veterinary medical associations and have held
4 various leadership positions including President of the Northern Virginia Veterinary
5 Medical Association and the Virginia Veterinary Medical Association.

6 In addition I have served as a local practitioner representative in the
7 AVMA accreditation process for the veterinarian technical program at the Northern
8 Virginia Community College. I have been a practice owner for the past 23 years and
9 currently employ 6 associate veterinarians.

10 During my time as an employer of veterinarians I have interviewed a large
11 number of perspective candidates and have hired in excess of 20 associate veterinarians.
12 My comments here today have to do with the present quality of graduates from veterinary
13 schools accredited by the AVMA.

14 It has been my impression that all graduates of AVMA accredited
15 veterinarian schools are afforded a good education in science, practical skills and
16 exposure to the various disciplines within the practice of veterinarian medicine.
17 Obviously there will be differences in what each individual will do with their education.
18 There will be differences in work ethic and communication skills but these items are not
19 relevant to one's basic education.

20 It is my believe after years of interaction with new and seasoned
21 veterinarian practitioners that the basic education afforded to individuals who receive
22 admission and graduate from accredited veterinarian colleges and of those who receive

1 licensure that these individuals are capable and ready to enter the veterinary profession as
2 practicing veterinarians.

3 Once in practice these individuals can be expected to grow professionally
4 and improve their skills. Many over time will become leaders in our profession and
5 become involved in organized veterinarian medicine thus enhancing the advancement of
6 our profession. I have witnessed this repeatedly.

7 It is my opinion that the present system of accreditation for veterinarian
8 colleges has served the profession and the public well and I see no reason to alter it now.
9 The quality of veterinary graduates has improved over time and it will continue to do so
10 as long as high standards for the veterinary education are maintained.

11 There is no surplus of veterinarians in our area. And the students that we
12 see are smarter each year and they really do an excellent job so I thank you for this
13 opportunity to speak today.

14 MS. PHILLIPS: Thank you. Questions for this speaker? Thank you very
15 much for joining us. Our next speaker is Jim Wilson I understand that this is the last
16 speaker we have on our list welcome, thank you for joining us.

17 MR. WILSON: Thank you very much. My comments are those of a
18 veterinarian with a veterinary degree from Iowa State University in 1967 and a law
19 degree from UCLA in 1973. I have taught veterinary law and ethics, career development
20 and business management from 2 to 18 schools per year all over the U.S.A. and the
21 Caribbean since 1978.

1 As part of that teaching one of my subjects has been personal finance and
2 career development. I was here in 2012 when we had to extend the morning's hearings
3 because of the frustration of this country's veterinarians. I apologize for the fact that
4 because of my multi-school teaching commitments I was unable to provide written
5 testimony prior to the deadline. I was teaching at 5 different schools 6 weeks right when
6 your deadline was coming around to the plate.

7 I am here today to reference sections of the DOE's court of federal
8 regulations criteria that were not met at the time of the prior NACIQI hearing and still are
9 not covered. I am talking specifically about CFR 602.16 and 602.19 Section B okay.

10 The first of these sections requires that the Agency that is the Agency
11 doing the accrediting has access to and include periodic reports and collection and
12 analysis of key data and indicators including but not limited to fiscal information and
13 measures of student achievement.

14 To me fiscal means financial, key means essential and achievement means
15 the ability to use the academic knowledge to success personally, professionally and
16 financially after graduation. I am here to tell you today that the curriculum enforced by
17 the COE does not exist today to allow students to succeed personally, professionally and
18 financially.

19 The second section I'm citing Section 6.02.19B is says that consistent with
20 the provisions of Section F the Council must fulfill responsibilities under the Title 4 of
21 the Act that includes data on the most recent student loan default rates. I would add that

1 when doing this they also should provide predictive data regarding the likelihood of
2 changes to the default rate in the years ahead that does not exist either.

3 How do I know this? How do I know this -- it is because of the AVMA's
4 report on the market for veterinary education, anybody here ever see or hear about this
5 before? Okay this is brand new. 76 pages here folks okay -- although some valuable
6 information -- fiscal information exists regarding the 3,300 students graduating from U.S.
7 based schools -- accredited schools, it is devoid of critical information regarding the 1200
8 students per year graduating from the schools outside the U.S.A.

9 Wait did anybody hear anything from -- anybody hear about the 1200
10 students that's one-quarter of all graduates outside of the U.S.A.? I am going to ask if
11 you would please I teach 40% of the students in the United States --

12 MS. PHILLIPS: Thank you for your comments. Questions for this
13 speaker? I do have one question for you -- you mentioned that you were teaching 5 or 6
14 different institutions at the same time, how do you do that?

15 MR. WILSON: I do that teaching in blocks. I teach from anywhere from
16 8 to 16 hours over a period of 2 days that go with that and I very much would ask for an
17 opportunity because no one else has taught 40% of the students in the U.S.A. over the last
18 5 years -- over the last 20 years -- my comments are so critically important I would ask if
19 you could please hear at least a few more of those we put together an accreditation
20 Standard No. 12 with --

21 MS. PHILLIPS: I appreciate your efforts we do have a limitation of three
22 minutes for public commenters.

1 MR. WILSON: I knew that and I realize that.

2 MS. PHILLIPS: Thank you very much for your comments.

3 MR. WILSON: Oh by the way --

4 MS. PHILLIPS: Thank you very much for your comments. This
5 concludes our comments from public third party oral commenters for the day. The
6 Agency would like to ask you to return to have the opportunity to respond to third party
7 comments. We would like to invite any statements you would like to respond to third
8 party comments and we may have some questions for you further.

9 MR. SCAMAHORN: I would like to address the comment by Dr.
10 Robinson about the House of Delegates electing -- the House of Delegates do not elect
11 people to the Council of Education so that practice ended several years ago and they are
12 not involved in that selection process.

13 MS. PHILLIPS: How are people selected for the Council?

14 MR. SCAMAHORN: The people are selected by two different entities,
15 there are selection committees that appoint the practitioners if you will, the 8 practitioners
16 on the Council there's a selection committee that appoints the AAVMC the college
17 representatives, so completely separate from the House of Delegates.

18 MS. PHILLIPS: Thank you other questions for the Agency yes Hank?

19 MR. BROWN: I would be interested in your reaction to the suggestion
20 that we heard that a teaching hospital should be an integral part of the education of a
21 doctor of veterinary medicine?

1 MR. PASCOE: So as you heard me comment earlier there's only one
2 accredited college in the United States at the moment that does not have an academic
3 teaching hospital. It actually has a hospital but it has a distributed model of clinical
4 education so it is not as comprehensive in its approach as the rest of the schools.

5 Having said that all of the schools require as part of their curriculum a
6 clinical training, externship opportunities and so students do spend time in a variety of
7 different clinical educational experiences throughout the United States and sometimes
8 overseas.

9 I think that the other thing that needs to be kept in context here is the
10 majority of the accredited schools or land grant institutions. And historically the land
11 granted institutions were formed at a time when veterinary medicine was very different
12 than it is today.

13 As you've heard testimony today from a number of specialists and one of
14 the things that has happened in the profession robustly so since the rule in the 1970's is
15 the evolution of specialties within veterinary medicine. So in my own school we have 34
16 different specialties with over 100 residents in training as specialists.

17 Having said that they're -- and I don't know what the exact number is but
18 there are a substantial number of specialty hospitals in the -- veterinary hospitals in the
19 United States and those hospitals offer patient care and clinical learning opportunities that
20 are equivalent to those offered in academic teaching hospitals.

21 MS. BRANDT: The only thing that Council does have put in place areas
22 for example if a college uses a distributive clinical model they are required to identify

1 what specific discipline that location is being used, they identify core clinical sites and
2 when this Council does a site visit the site team is required to have at least a portion of
3 the site team which means a minimum of two members using a standardized evaluation
4 form to visit every single one of the primary core sites.

5 So for example Western has 51 core primary instructional sites they added
6 three days to the site visit and they visited 51 core instructional sites.

7 MR. SCAMAHORN: Additionally the off-campus experiences such as
8 the externships that Dr. Pascoe referred to it is being more difficult for a teaching hospital
9 to have all of the teaching schools to have all of the teaching areas within that hospital
10 anymore and so there is not probably one of all the veterinary schools in the United States
11 who don't use some off-campus site for a core education you just can't physically do it
12 anymore.

13 DR. PHILLIPS: Further comments, Frank?

14 MR. WU: In the interest of due diligence I feel I really should ask you
15 about these two individuals and the gag orders one of whom signed and one of whom
16 refused to sign could you just provide a little background on what's going on there?

17 MR. PASCOE: I can try. So Dr. Kay mentioned his suspension from the
18 Council that occurred outside of this recognition period none of us were members of the
19 Council at that time and I really don't have specific knowledge of the events concerning
20 that.

21 The other one you may recall at the December hearing Dr. Mary Beth
22 Leininger testified -- Miss Neal I believe at the time encouraged the Committee and I

1 apologize I can't cite the specific 6.02 section but that was added during the December
2 hearing in 2014 and so the Council has responded as we did in our compliance report
3 with specific policies and practices that address the issue of suspending somebody the
4 appeal's process et cetera and coincident with that we also employed independent counsel
5 who advised and helped develop the processes for that.

6 I'm not sure whether I have answered the specific question but Dr.
7 Leininger was -- there was a hearing process Dr. Leininger was reinstated to the Council
8 and I would have to say the Council welcomed her back and she is a functional and
9 participatory member of the Council.

10 MR. WU: Why was she removed to begin with and was she reinstated
11 subject to some conditions?

12 MR. PASCOE: So Karen do you want to answer the removal portion?

13 MS. BRANDT: The member was removed because of comments that
14 were made regarding a specific type of veterinary program that is accredited by the
15 Council and it was made public and there were concerns with regard to a perception of
16 bias in that that was not in line with the fiduciary responsibility of a Council member.

17 And then she availed herself of the appellate procedures that were in place
18 at the time. The settlement in the appeal proceedings as agreement by all parties was
19 agreed to be a confidential process.

20 MR. PASCOE: I can answer the restriction piece. Part of that settlement
21 agreement was that Dr. Leininger would recuse herself from discussions and vote on the
22 accreditation of international schools and that was directly related to the fact that it was

1 felt that because she had publicly spoken against accreditation that it would create the
2 perception at the very least of bias and that it was not in the interests of the Council to
3 have deliberative decisions with somebody with a known or perceived bias against the
4 accreditation of international schools.

5 MR. WU: And one more question that ties in to all of this. I am assuming
6 something and it is in the record I just want to make sure I have this right. In order to be
7 licensed to practice in the U.S. is it true in every jurisdiction that you must have
8 graduated from an accredited institution specifically accredited by your agency?

9 MR. PASCOE: Sorry it varies by jurisdiction. The key element though is
10 that you have to have either graduated from an accredited school or you have to pass the -
11 - and this is the part that is a little bit variable but in most jurisdictions if not all if you
12 haven't graduated from an accredited school you have to pass the ECFEG exam and then
13 you have to pass the national licensing exam and then whatever state requirements.

14 In a number of states there is a parallel or an equivalent pathway that's
15 offered through the American Association of veterinarian state boards that's called the
16 paved process. That particular process and I apologize I can't -- I don't -- I'm not current
17 on it I actually served on that Committee for 10 years there are I believe and I don't know
18 what the current figure is but at least 34 jurisdictions that recognize the paved certificate.

19 There are a number of states that because that's in statute the practice Act
20 7 being opened up or there is reluctance to recognize that specific pathway of educational
21 equivalency.

1 MR. WU: So is the following statement a fair and accurate statement:
2 Most licensed vets in the United States have graduated from an institution you accredit
3 but not all of them.

4 MR. PASCOE: Yeah that would be a fair statement.

5 MR. WU: May I ask staff a question? Do I have it correct and this has
6 come up before -- there's nothing that precludes an Agency recognized by the
7 Department from accrediting institutions outside of the United States, they are free to do
8 that should they wish to do so they are not required to do it.

9 MS. MORGAN: That's correct and they can't -- that doesn't bestow Title
10 4 eligibility.

11 MS. PHILLIPS: Herman as an additional response for you.

12 MR. WU: And I was going to ask do you have any sense how many
13 agencies operate outside of the U.S.?

14 MR. BOUNDS: And Sally you could correct me if I am wrong if I cite
15 the wrong rule or reg but I did want to bring to the attention of the Committee that last
16 year 2015 the Department was charged with approving foreign veterinary medical
17 accrediting agencies for Title 4 purposes but it was for funding I'll just say federal
18 funding -- if that's incorrect or not Sally?

19 MS. MORGAN: I guess I wanted to distinguish between this body which
20 deals with recognition.

21 MR. BOUNDS: Absolutely.

1 MS. MORGAN: And the NCFMVA which deals with this other
2 eligibility of foreign medical schools.

3 MR. BOUNDS: So what we did we reviewed 4 foreign veterinarian
4 medical accrediting agencies and on 1 July 2015 we reviewed and approved the
5 Australasian Veterinary Board's Council, we approved the Granadain National
6 Accrediting Board, we approved the Rawal College of Veterinary Surgeons and we also
7 approved the AVMA to accredit foreign veterinarian schools.

8 We were asked to do that so that I guess you know students they couldn't
9 attend -- U.S. students couldn't attend foreign veterinarian schools. Again like Sally said
10 outside of this body's purview but I just wanted the Committee to be aware of it.

11 MR. WU: I always forget we have this -- I always forget we have this
12 obscure twin out there that our staff also supports and works with so do I have it correct
13 that body that oversees the foreign medical schools now has foreign vet schools as part of
14 its portfolio or is this a totally new different body?

15 MR. BOUNDS: There's really no body.

16 MS. MORGAN: Yes I'm sorry I misspoke it isn't subject to SNCFMEA.
17 There is an eligibility requirement that the Department put in -- it's a regulatory
18 requirement that a foreign medical school has to be accredited by an agency approved by
19 the Department and the Department's you know it is the Department it is not recognition
20 and it is not through this body.

21 MR. WU: I see so it is through you -- staff but you operate as a Title 4
22 gate-keeper for those purposes?

1 MS. MORGAN: No the AVMA or whichever ones we approved would
2 operate as the Title 4. It isn't recognition but the regulation says that the school has to be
3 a foreign veterinary school has to be accredited by an accrediting agency approved by the
4 Department.

5 MS. PHILLIPS: And the approved by the Department does not go
6 through this group?

7 MS. MORGAN: Exactly your authority is under Section 496 of the HEA
8 which talks about limits the recognition process to state or national scope.

9 MR. WU: And so which body is it that's approved these 4 schools just so
10 I understand and then a quick follow-up -- why in the world is there a separate little thing
11 out there that isn't our purview? It's not that I'm trying to capture more turf for us I am
12 just curious why is this one little thing out there?

13 MR. BOUNDS: Again I may ask Sally to jump in. We don't know who
14 wrote the rule but we are asked to design and develop a process to review the
15 accreditation standards used by foreign veterinary accrediting bodies. Conduct a review
16 of their standards and then make a recommendation to have those organizations
17 approved.

18 MS. MORGAN: Unlike domestic schools foreign schools don't have to
19 be accredited by a nationally recognized accrediting agency that is not a statutory
20 requirement. The statutory requirement for foreign schools is that we determine that they
21 are comparable to domestic schools under regulations to be promulgated by us.

1 One of the regulations we promulgated recently out of a concern I think
2 for you know quality was that these foreign veterinary schools be accredited by an
3 agency that we had given a checkmark to.

4 MR. WU: Last question so it's only veterinary schools, there aren't other
5 foreign schools out there and other disciplines that are outside of our purview and subject
6 to some special regulation?

7 MS. MORGAN: This particular regulation is only about veterinary
8 schools and it is a regulation. And in addition the HEA itself talks about foreign medical
9 schools and those are the ones that are approved that have to be accredited by an agency
10 or a country under standards approved by the NCFMEA.

11 MS. PHILLIPS: Federico?

12 MR. ZARAGOZA: Just to follow-up as Frank got moving in that
13 direction gate-keeping function and if so what presented this to the current financial
14 assistance?

15 MS. MORGAN: You are asking about the foreign veterinary schools?

16 MR. ZARAGOZA: Yes.

17 MS. MORGAN: They -- what percent of them receive Title 4 is that what
18 you are asking?

19 MR. ZARAGOZA: What percent? Are students eligible for financial aid
20 number one, they are but how many of them are?

1 MS. MORGAN: They are eligible if the school meets our regulatory
2 eligibility requirements a foreign veterinary school can be eligible but only for direct
3 loans. They are not eligible for POW and work study other --

4 MS. PHILLIPS: Any further questions for the Agency at this point. We
5 would ask the staff to rejoin. Any comments to follow-up on the third party comments or
6 the Agency and any questions by the Committee of the staff -- seeing none we can move
7 to the discussion, motion and vote. My apologies Bobbie Derlin, sorry we have a
8 question?

9 MS. NEAL: On the election issue that we just addressed I mean I went
10 back and looked at the transcript of before and I was talking about what was referenced
11 as a politically oriented election process and you say that you now changed that process
12 but nevertheless do you still have people who are being restricted in terms of what they
13 can say and do?

14 So was this person under the original election process that is still there or
15 how is your process now de-politicized compared to what it used to be?

16 MR. SCAMAHORN: The House of Delegates would and it was open to
17 anyone who wanted to apply and run for any Council. There are a series of Councils
18 throughout the AVMA and those Councils, other Councils are still elected by the House
19 of Delegates as well as the officers and the Association.

20 And so this person was elected at that prior under the old system with that
21 and that is not the system now.

1 MS. NEAL: So the current system is much less open is what you are
2 saying?

3 MR. SCAMAHORN: No it is more open. You can self-nominate, put
4 your name in the hopper and there's a call for nominations, a call for individuals to serve
5 and anyone can put their name in, they can do it themselves or they can be recommended
6 by association but it is entirely open.

7 MS. PHILLIPS: Simon?

8 MR. BOEHME: Simon Boehme. And thank you for joining just a quick
9 question for you and hopefully an easy one. How are students incorporated in your
10 process and maybe walk me through specifically since you have last come to NACIQI
11 until now. Have you incorporated students more in your process, thank you?

12 MR. PASCOE: So I'll give you a two part answer. As part of the -- since
13 the previous hearing we conducted a session with students to hear their concerns about
14 accreditation and to provide information to them independent of that as part of the normal
15 site visit process we interviewed students, we observed students both in the classroom
16 and in the clinics and we have multiple opportunities to interact with them or the site
17 teams have multiple opportunities to interact with them during that process.

18 In addition to that there is a confidential session provided for students that
19 can come and meet with the site team to share anything and we require every college to
20 provide the opportunity and we verify that this is done on multiple occasions during the
21 year. The opportunity to provide confidential comments in an anonymous way to the

1 colleges we expect them to report that and they are supposed to report it in their annual
2 interim reports as well.

3 MS. BRANDT: The other thing that I would add is that any surveys that
4 are sent out with regards to standards et cetera, with regards to accreditation they always
5 include a student component as well as practitioners.

6 MS. PHILLIPS: Further questions for the Agency or staff? Moving to the
7 possibility of a Motion?

8 MS. DERLIN: I'd like to make a Motion that we accept the staff
9 recommendation to continue the Agency's recognition for one and one-half years.

10 MR. WU: I'll second.

11 MS. PHILLIPS: Motion made and seconded. Further discussion? Seeing
12 none prepared to call a question? Those in favor of the Motion as seen? Those opposed?
13 Abstentions?

14 **NACIQI RECOMMENDATION: Thank you the Motion carries.**

15 Thank you very much for your patience and for joining us, thank you for the staff.

16 MR. PASCOE: Thank you.

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1 **NORTHWEST COMMISSION OF COLLEGES AND UNIVERSITIES (NWCCU)**

2 MR. PHILLIPS: Working our way through the next item of our agenda
3 next is a compliance report for Northwest Commission on Colleges and Universities.
4 Primary Readers are Paul LeBlanc and Cameron Staples, Department Staff is Nicole
5 Harris. I understand we don't have the Agency representation today so let me ask Cam to
6 introduce the Agency.

7 MR. STAPLES: Thank you Susan. The Northwest Commission on
8 Colleges and Universities is a regional institutional accreditor that accredits over 150
9 degree granting institutions in 7 states including those programs offered via distance
10 education with these institutions. The Commission was originally recognized in 1952
11 and has had a series of recognitions since the last full review was conducted in
12 December, 2013 at which time the Agency was found out of compliance by the
13 Department on 12 sections and by NACIQI on 10 sections.

14 A series of actions occurred following that where some of the items were
15 appealed by the Agency, 5 items in total were appealed. The Secretary reversed the
16 decision concerning 3 of the sections and affirmed the decision regarding 2 of those
17 sections and it is the 2 sections that he affirmed which is the subject of the compliance
18 report before us today.

19 Those particular sections relate to documentation necessary to demonstrate
20 that the Agency's policies and procedures regarding changes of ownership meet the
21 requirements of our approval process and I would defer to the staff for further
22 explanation.

1 MS. PHILLIPS: Thank you, Nicole?

2 MS. HARRIS: Again good morning Madame Chair and members of the
3 Committee. For the record my name is Dr. Nichole S. Harris and I am providing a
4 summary of the review of the compliance report for the Agency Northwest Commission
5 on Colleges and University.

6 This compliance report is in response to the Secretary's appeal decision
7 for Section 6.02.24A and B. The staff recommendation to the senior Department official
8 is to accept the Agency's report and continue the Agency's recognition for one and one-
9 half years. The recommendation regarding a one and one-half year period of renewed
10 recognition is merely a reflection of the fact that the Agency appeal was just completed in
11 2016 which impeded on the maximum 5 year grant of recognition.

12 This recommendation is based on our review of the Agency's report of the
13 remaining issues and the supporting documentation. The remaining issues from the
14 Petition review in 2013 required documentation to demonstrate the implementation of a
15 new and revised policy concerning branch campuses and documentation that it adheres to
16 the site visit requirement for changes in the ownership.

17 Our review of the Agency's Petition found that the Agency is in
18 compliance with the two sections of the Secretary's criteria for recognition. The Agency
19 has provided sufficient information and documentation to demonstrate that it consistently
20 adheres to the review and approval of a branch campus. The Agency attests to adherence
21 to the site visit requirement for changes in ownership and has revised a substantive

1 change policy which now specifically requires that a site visit be conducted within a 6
2 month period after approval of a change in ownership.

3 The Agency also informs Department staff that to date it has not had an
4 opportunity to apply its amended policies on change of ownership. Since the Agency's
5 last review in 2015 the Department has received and reviewed one complaint.

6 In conclusion as I stated earlier the staff recommendation to the senior
7 Department official is to accept the Agency's report and continue the Agency's
8 recognition for one and one-half years, thank you.

9 MS. PHILLIPS: Questions for staff, Anne?

10 MS. NEAL: What is the complaint about?

11 MS. HARRIS: I will defer that to Herman.

12 MR. BOUNDS: Well I have to recall. I know it was decided in the
13 Agency's favor. I believe that was an issue that came up during the last report was the
14 continuation the complaint related to -- cited the procedures that one of their accrediting
15 institutions I would have to look and get back with the Committee on the specifics of that
16 complaint.

17 MS. PHILLIPS: Further questions of staff? We do not have Agency
18 representatives here today nor do we have third party comments so I will leave it to the
19 Readers to advance a possible Motion for the Committee to consider.

20 MR. STAPLES: Yes thank you Madam Chair. I would support the
21 Department's Motion for continued recognition for another one and one-half years which
22 completes the 5 year period is possible.

1 MS. PHILLIPS: Seconded by Bobbie Derlin. Any further discussion?

2 Anne?

3 MS. NEAL: The last time that Northwest was before us I voted against
4 them and in my on-going interest in focusing on the inconsistent application of standards
5 to accrediting bodies based on their community of interest I will vote against this renewal
6 looking at the chart that the Department has provided of the performance of the
7 Northwest Commission most particularly the graduation rates I find them to be woefully
8 low even vis-à-vis very low national average and in the absence of bright line quality
9 standards it is with regionals looking at the graduation rates becomes one of the few ways
10 that we can really assess whether or not they are doing a good job so I just will go on
11 record that I will oppose this renewal.

12 MS. PHILLIPS: Thank you further discussion? Oh I'm sorry Kathleen?

13 MS. ALIOTO: Could you tell me -- let's see the percentage of 4 year let's
14 see -- how many are less than 4 year in this so the graduation data wouldn't be --

15 MS. HARRIS: I'll defer to Jennifer.

16 MS. HONG: Kathleen are you looking at the institutions by sector up in
17 the top the first glance? I know it is hard to see.

18 MS. ALIOTO: It says 74.

19 MS. HONG: That's right 74 institutions are public less than 4 year and 79
20 overall.

1 MS. ALIOTO: Yeah so that would -- you could understand why the
2 graduation rates because some 2 year schools have such a wide variety of programs that
3 they are providing.

4 MS. NEAL: But Kathleen I'm just looking at average graduation rates of
5 4 year I'm not looking at a broader community.

6 MS. ALIOTO: Okay.

7 MS. HONG: Just to add to that it is first time full-time graduation rates.

8 MS. PHILLIPS: Simon?

9 MR. BOEHME: Why is there no Agency representation here today?

10 MS. HONG: They notified us yesterday that they wouldn't be able to
11 make it I think they had planned on coming they had a Commission meeting and they just
12 said that they weren't going to be able to make it.

13 MR. BOEHME: I will unfortunately not be supporting the Motion
14 because last time Northwest came in front of us I was extremely disappointed by their
15 presentation and a lack of willingness to engage with NACIQI and I have to echo my
16 colleague Anne I think our actions with the AVA and ACICS we should all strive to be
17 consistent in how we apply our standards in our examination and I would like to see the
18 Agency come before us so we could engage with them in a meaningful conversation.

19 MS. PHILLIPS: Simon I'm not sure if you are thinking about Northwest
20 or the Higher Learning Commission it was the one that you had interacted with
21 previously, perhaps it was both.

1 MR. BOEHME: Yeah you bring up a good point. I am very excited about
2 engaging HLC at an upcoming NACIQI meeting but previously at the last Northwest you
3 are right these are two Commissions that I would just like to have further dialogue with
4 but thank you.

5 MS. PHILLIPS: Art?

6 MR. KEISER: It is interesting to look at the score card and I think it is
7 important to bring it up. This is one of the challenges -- is that the regionals are much
8 more diverse in their types of institutions yet the data brings it all together and kind of
9 creates an artificial picture for us because you have community colleges that tend to have
10 lower graduation rates and that's half -- let's see 79 of their institutions are less than 2
11 year and 80 of their institutions are above 2 year it's pretty hard to understand where each
12 one of those types of institutions sit so if you have let's say a Commission that has all or
13 very high-end schools they blend and offset the low-end schools and it doesn't give us a
14 lot of information that helps us make a decision especially in a larger regional diverse
15 population where an agency that serves mostly technical schools will have a different
16 type of look that will be very specific to those schools.

17 So I think it is important to look at that and when we take these things into
18 consideration.

19 MS. PHILLIPS: I have Frank and Bobbie.

20 MR. WU: I realize this comment will be ironic since it is made to the
21 people who are still here but my comment is I am only surprised at how the attendance
22 diminishes and that agencies don't leave at least an intern or somebody to watch what's

1 going on because there's a lot of stuff that happens here that would be of great interest and
2 the agencies that have had let's say a bumpier ride would be really well served to stay for
3 the entirety of the meeting because they might benefit from seeing how other agencies are
4 treated.

5 So it is members of the press or CHEA if someone could just get this
6 message out and the folks that are here are astute and know that but I am just astonished
7 although I will support the Motion I really think it's bad form to not appear at a hearing
8 where really unfortunate things could happen to you in your absence even bearing in
9 mind that we did run over but you know our meeting notices go out months in advance.

10 Anyone in accreditation who has come to any NACIQI hearing is aware
11 that we often run over and anyway it is just a comment that I am just appalled at the
12 diminishment of attendance and I hope that media will at least say something about this
13 higher education press so that folks know.

14 And it is not that we have to hold court it is just that it would make things
15 more efficient and people would benefit from having some presence or some observer
16 here for the duration of these sessions.

17 And certainly should be here when they are being considered.

18 MS. PHILLIPS: I have Bobbie, Art, Ralph and Cam.

19 MS. DERLIN: Since we had some adjustments to our agenda are we
20 compelled to consider this today? Because I share the concerns that other people have
21 mentioned particularly nobody being here from an Agency when we in fact have
22 pertinent questions for them -- do we have an option to defer?

1 MR. WU: May I add to that to defer for scheduling reasons not
2 substantive ones because Susan as Chair you have put over a few of the other agencies
3 for the telephone call you know, could we just shift the order of these and take this up on
4 the phone call?

5 MS. PHILLIPS: We are having a little open meeting conversation. While
6 we are waiting for their response I am going to continue the speaking order. We will get
7 some guidance for that in a moment. I have Art, Ralph and Cam.

8 MR. KEISER: I'll make this short. It is again interesting because this is
9 the second one where the Commission made that their Board meeting which could have
10 been scheduled a different time was less important than their recognition. I dare say the
11 Commission yesterday would have felt a little differently so I think it is an interesting
12 comment on their commitment.

13 MS. PHILLIPS: Guidance?

14 MS. MORGAN: I guess first of all as Donna points out they were
15 scheduled for today. I think this is sort of a holdover. There has been a change in
16 NACIQI and its focus and it used to be much more common for NACIQI to accept the
17 staff report and the staff report here was positive.

18 So I don't know that it would be fair to punish them but in spite of what I
19 said the other day about deferral if you do feel like you need to talk to them before you
20 can affirm I would certainly support including them on the August or the telephone
21 meeting if you want to do that.

1 MS. PHILLIPS: Just one point of clarification before we go to Ralph,
2 Cam and now Arthur. This particular agency was not part of the pilot project and so it
3 was not told that it would be asked additional questions. It was only a compliance report
4 on only two issues so I just want to be clear that there is a different set of expectations
5 that may well have been drawn for this Agency than for others that we have been focused
6 on.

7 It doesn't say anything about why they are here or not here but it does give
8 a different kind of context for this particular one. I have right now Ralph, Cam, Arthur,
9 Bobbie and Frank.

10 MR. STAPLES: Thank you I just have a procedural question about the
11 phone call. Is the phone call intended to be an opportunity to ask questions of agencies or
12 is it intended to be a meeting where we will act on items without Agency participation?

13 MS. PHILLIPS: My understanding is it is a full meeting like this only just
14 not in person.

15 MR. STAPLES: So we would be able to have the Agency on the phone
16 call, I wasn't sure that we were and I guess I would just say as the maker of the Motion to
17 the extent it is relevant I completely agree that I can't believe they are not here either,
18 particularly since they were scheduled for today and I would be very happy to withdraw
19 the Motion and to have us defer action as least as the Primary Reader.

20 MS. PHILLIPS: Ralph?

21 MR. WOLFF: Yeah I guess I'm not clear whether there -- I'm not clear
22 whether there was a Commission meeting and having been an Executive Director you

1 need to be with your Commission but I would think that one would try to reschedule or
2 come at a certain part of the agenda.

3 I think it's been a -- it's not clear whether when there is a compliance
4 report and particularly when you added the information about they weren't part of the
5 pilot, whether there is an expectation to show up. There have been cases I believe where
6 no Agency representative has shown up so I think one -- we need to clarify whether --
7 what our procedure is or maybe that's already been the procedure but I would not want to
8 punish an Agency for not showing up if it is not part of the procedure.

9 If they had not shown up and been part of the pilot I would be really -- I
10 think that would be inappropriate. I would also say that I'm prepared to support -- wait
11 there is no Motion now it has been withdrawn but I would say that having really
12 investigated deeply yesterday one Agency the AVA before I think all agencies coming up
13 need to be prepared to embellish and add to the score card information whether we
14 continue the pilot of not as part of 602.16 and other information and acknowledging that
15 this data is probably more complicated for regional agencies given the range of
16 institutions those kinds of explanations I think are even more important for our
17 understanding of the data.

18 So I am not quite clear if we were to put Northwest on the phone call
19 whether they are being added to the pilot. I mean in a sense if we have not included them
20 in the pilot are we expecting to engage in conversations about pilot issues around risk
21 assessment about the use of data and the like.

1 I just want to prepare the Agency saying if they are going to move to the
2 phone call are they being added to the pilot, are we asking that they add to or just say that
3 they should be prepared for any question that a Committee member might ask.

4 MS. PHILLIPS: Right. I would venture to say that compliance report on
5 issues of branch campus and change in ownership would be likely to come thinking it
6 would get only questions about that. If that was an issue -- especially given that they
7 were in this context when we said that they wouldn't be part of the pilot.

8 So it may be that the -- both the history of the Committee and the
9 confluence of a new pilot process might have led somebody to believe life is different
10 only for the ones that are part of the pilot project. I have no idea if Northwest is thinking
11 this way but I am sensitive to the different -- the speed at which the expectations are
12 becoming known in the accreditation community.

13 I would also just note that at this moment there is also a WASC meeting
14 and actually that is why one of our members isn't here because his commitment at this
15 point was to WASC so there is some scheduling issue that I am not sure why those
16 calendars don't work out but would encourage the farther in advance that we know our
17 meetings the better that we can reduce the likelihood that there will be those kinds of
18 conflicts. I have Arthur, Bobbie and Frank.

19 MR. ROTHKOPF: Cam has I think changed the Motion which is what I
20 was going to suggest but I guess I would make this observation. I think the world of
21 accreditation is changing and I think the world of what we do with NACIQI is changing
22 as well.

1 I would say if someone is on the calendar they have to be prepared to
2 answer any questions and if we are going to defer I don't think we should treat a regional
3 or Northwest any differently from anybody else. Everyone has got to be prepared to
4 answer questions as to what they are doing and I particularly note Simon's comment here
5 and I would agree with it.

6 I think we need to -- I don't know whether it is a pilot or not a pilot but
7 they have got to show up by telephone if that is what we elect to do and answer whatever
8 questions we now have and what was told a month ago I would say should not
9 necessarily be relevant today.

10 MS. PHILLIPS: Bobbie?

11 MS. DERLIN: I just want to speak a little bit to this issue of what
12 questions might be asked or not be asked. I don't think including or excluding Northwest
13 from the pilot's study is germane. As you may recall I did at a previous meeting argue
14 for limiting our questioning specifically to the agenda item where the compliance issues
15 and took my knocks from the rest of the Committee related to our wanting to have an
16 open question process.

17 So I see moving Northwest to a future phone call as an opportunity to
18 assure that we all get to ask our questions to representatives of the Agency.

19 MS. PHILLIPS: Frank?

20 MR. WU: Just a clarification. I'm not suggesting that we punish or be
21 vindictive here, but I would make two points I know I am only speaking for myself but I

1 want to stress these. The first is that agencies should appear at NACIQI hearings when
2 they are on the agenda. I think that's just an unambiguous statement of best practice.

3 And it is in their own self-interest. It would be foolish not to and they
4 would be better off not double booking. I understand that Board meetings are important
5 and we should be doing our best to schedule in advance. I am delighted to see that we
6 have our December date set. These agencies have more than one person in their office,
7 they have staff, they can send other individuals, they can make arrangements.

8 The second thing that I want to highlight that I thought was already
9 apparent when my colleague Simon said a couple of years ago there's a new sheriff in
10 town and as Arthur Rothkopf just noted accreditation is changing. If anyone who
11 operates an accrediting agency is not aware that this NACIQI is not their grandfather's
12 NACIQI they shouldn't be operating an accrediting agency. It is so -- we need to
13 disseminate this and I think a lot of folks already know this but apparently out there in the
14 world there are still people in this business unaware that we actually are a watch dog that
15 is going to watch and bark and when necessary bite so that message should get out there
16 so I would encourage whoever here is watching disseminate that message, that's all.

17 MS. PHILLIPS: So Sally?

18 MS. MORGAN: I just wanted to mention -- maybe I wasn't clear earlier.
19 This Agency is before NACIQI on a compliance report so I would expect any additional
20 questioning -- I mean you can add your pilot as well but it should not be on findings that
21 are already closed and decided.

1 MR. WU: That's entirely fair and well taken but they should be here to
2 answer the questions that are appropriate to ask, that's my whole point.

3 MS. MORGAN: Agreed.

4 MS. PHILLIPS: Ralph and Anne.

5 MR. WOLFF: In fairness to the -- I mean I support moving forward. I
6 think it's a separate matter given the cost and time I wonder even if someone could
7 appear by telephone or video or whatever. We are in a technology age where people do
8 do business and if there are real scheduling issues whether that -- but I leave that as a
9 separate matter.

10 Given the actions that we have taken at this meeting and given the interest
11 of this Committee and I would go back to the treatment by one of my colleagues of the
12 previous regional where the conversation was beyond what the compliance report was
13 about but was about the handling of retention at graduation.

14 Is it possible to add Northwest to the pilot for the phone call so that we
15 have this conversation? I see you shaking your head but I -- the thing is I am trying to
16 figure out whether I'm not clear -- we have been addressing these issues with every
17 agency and so I am -- I guess what I am hearing from Sally saying that some of these
18 questions on the score card and the like are not necessarily germane to change of
19 ownership and the like for the phone call.

20 MS. PHILLIPS: Just to clarify we have had three different parts to our
21 Agency Review Agenda. There was the Consent Agenda which was not part of the pilot,

1 there was the Compliance Report and other matters related to the regulations -- that was
2 not part of the pilot and then there was the Renewable Petitions that was part of the pilot.

3 As it happens the bulk of our agenda has been renewal petitions which are
4 part of the pilot. But to be clear when we set it up it was three different parts only one of
5 which was going to have the pilot component to it, at least that is what we had publicized.

6 Whether we can add a compliance report to that pilot for the telephonic
7 meeting I need to talk with folks about can you do that and then the separate question is I
8 think I heard Sally say that you probably shouldn't be asking about issues that are outside
9 of the compliance issues.

10 So it would be restricted to only the parts of the pilot that would be
11 relevant to the compliance issues.

12 MR. WOLFF: Right.

13 MS. PHILLIPS: If it's addable and I just don't know if it is addable.

14 MR. WOLFF: Well to me they are two separate issues then. One is are
15 we deferring it because we want to ask questions about change of ownership in branch
16 campuses. Personally I have no questions about that. And the staff has found that they
17 are in compliance and so I can appreciate and would agree that it would be appropriate
18 for people to be here but I would not and if that is the case based on what you said and
19 what Sally has said and what Bobbie has said previously about are we focused only on
20 what are the compliance issues -- then it is a very limited scope phone call.

21 And so in which case I don't know that we need to make the point about
22 not appearing if we really don't have questions about branch campus and change of

1 ownership -- I'm just saying you know maybe we are making a point. To me we're
2 saying well you should have been here and therefore we are going to defer you.

3 But I would want to say what is more important is if we are limited in that
4 conversation that they are going to come up in a year and a half presumably that will be
5 an opportunity for pretty extensive review of the other issues that are really important and
6 so I am just raising the question of what's the right message and just using everyone's
7 time most valuably.

8 MS. PHILLIPS: I would like to ask for a clarification before going on to
9 Anne and Art. The clarification request and this is a procedure Committee matter is
10 whether we can add a compliance report to the pilot project so that if we wanted to pose
11 pilot-like questions about those two issues that we could do that.

12 MS. HONG: I wouldn't be comfortable with doing that for the set of
13 agencies that were scheduled for this meeting.

14 MS. PHILLIPS: What was the beginning?

15 MS. HONG: That I wouldn't be comfortable.

16 MS. PHILLIPS: Would be?

17 MS. HONG: Would not, not, no. The Federal Register notice was very
18 clear including what was going to be in the scope of the pilot and what is in the scope of
19 the review of a compliance report so I mean we all can consider that I guess for the
20 meeting in December but for the continuation of this agenda I would recommend not
21 doing that.

1 MS. PHILLIPS: So that leaves us with if we were to have an opportunity
2 to speak with the Agency representatives it would be focused on just the two issues in the
3 compliance report just to be clear about that. I've got Anne, Art and Bobbie.

4 MS. NEAL: I simply was opposing this by way of showing the procedural
5 difficulty on a compliance report because it one opposed initially and in the old days no
6 one opposed much of anything but if you opposed it initially by agreeing with the
7 compliance report one is continuing the extension so in essence it undermines one's
8 earlier vote.

9 So I am just pointing out that the way the compliance report approval
10 works it makes it difficult if you had initially problems before.

11 MS. PHILLIPS: Art?

12 MR. KEISER: I'm troubled by the limitation of the discussion because
13 prior to any pilot report we ask questions regarding a whole lot of issues that are not even
14 in the standards and if the issue and Simon's question about graduation rates and if they
15 don't have a bright line and it is not part of the compliance report we have asked that
16 before and it wasn't part of any of the discussions just a matter of certain issues that are
17 important to members and I think those issues not only should be heard but should be -- I
18 can't believe we would not allow them because historically any question that a member
19 made about any issue was an appropriate at least as far as I remember.

20 We have never been told we could not ask a question.

21 MS. PHILLIPS: Possible clarification that might help with that, Art and I
22 am going to ask Jen to speak to the Federal Register notice. Because of the pilot this time

1 and specifying that these agencies would be part of this pilot it also specified what the
2 agencies that are not part of the pilot would be asked. So we may have set up a different
3 set of expectations for this particular meeting because of the pilot.

4 I am going to ask Jen to speak to that because --

5 MR. KEISER: But even if it has nothing to do with the pilot, if I wanted
6 to know how many bathrooms they require per 25 square feet I could ask the question --
7 it's probably a stupid question but it is one that as a member appointed by a member of
8 Congress to be here I could ask that question.

9 MS. PHILLIPS: I am going to Jen to speak to that, that's my issue what
10 people were noticed about.

11 MS. HONG: I wasn't suggesting that we restrict your questions I think
12 that's fine as a matter of practice what we ask. I think the idea is making clear what is on
13 the scope of review for that meeting right. So if you raise an issue and you ask questions
14 about something that is not on the compliance report and you unearth something that is
15 troubling I mean this Committee has the authority to refer it back to the staff for further
16 review, right?

17 MR. KEISER: And that's exactly what I was trying to get at and I think
18 the concern that Simon had and some of the others had is they are not here to be able to
19 respond to any questions and we would like to -- chances are they should have been on
20 the consent agenda and it probably would have gone right through but the fact that they
21 are not here and they were on the agenda we don't have the opportunity to ask a question

1 whether it was relevant or not or whether you know it was specific to the compliance or
2 not.

3 MS. PHILLIPS: Bobbie?

4 MS. DERLIN: Well I was just going to ask for clarity and I think maybe
5 I'm clear now. I heard that the discussion of the compliance report was to be limited to
6 the topics of the compliance report and I have since heard and if that is correct then I
7 don't see any reason to defer this just vote on it now and get it tended to.

8 If in fact we have an opportunity to address a broad variety of issues with
9 this Agency then I am for deferral so just let me know.

10 MS. PHILLIPS: Yeah it would be useful to have a clarification of that. I
11 think I am understanding the two points of guidance a little differently so if we were to
12 bring this over to the telephonic call this matter to suspend our discussion now and to
13 resume it on the telephonic call what would be the scope of queries that would be
14 appropriate under that occasion and if I could get some clarify on that -- that would be
15 helpful.

16 MS. MORGAN: We have never in any meeting told Committee members
17 that you know shut up you can't ask that question -- we haven't done that. This is a little
18 bit different in that you would be deferring rather than making a decision. Now
19 ordinarily that would mean that you were leaving open the issues that are before the -- on
20 the compliance report now you know there are probably maybe 50 or so agencies that
21 you would like to ask questions about, I mean general questions about.

1 So I don't really see a distinction between those agencies and this one if
2 your issue isn't with the compliance report.

3 At the same time if your decision is to you know defer it and ask for
4 purposes of asking any questions I am not going to stop that. The Department always has
5 to keep in mind whether the Agency has had a fair notice and opportunity for whatever it
6 says as far as its actual decision-making.

7 MS. PHILLIPS: Thank you I think. I have Frank and Rick.

8 MR. WU: May I try to clarify the parameters here. I have heard three
9 things. One -- there is a general preference, a desire and it is considered a better practice
10 on a compliance report if we restrict ourselves to the subject on the compliance report.
11 Two -- despite that preference we routinely exceed that scope and staff would not feel
12 comfortable and I fully understand, saying to a member of NACIQI, "Hey you can't ask
13 that question." And in the past various members of NACIQI have exceeded the scope
14 and so we have just acquiesced to that and in fact it is a subject of contentiousness
15 amongst the members of NACIQI.

16 Three -- this particular hearing may be slightly different because of the
17 pilot where we have tinkered with some things and given a notice and so that may make
18 it a little different. So to sum up based on these three things my conclusion is this isn't
19 black and white. No one has said under no circumstances on a phone call are you
20 member X permitted to ask the question you want to ask.

1 There is just sort of a slight uneasiness on the part of staff oh if some of
2 these members exceed the compliance report maybe that's not such a bad thing -- but our
3 lawyer is not saying it would be illegal and you will be drummed off of NACIQI for it.

4 MS. PHILLIPS: Rick?

5 MR. O'DONNELL: Well I might be in the minority here but quite frankly
6 I am not offended that they are not here. I am not sure that 90% of what NACIQI does
7 adds much value. These are two minor compliance items I am not sure I would have
8 skipped a Board meeting to come and speak to us about two items. They weren't told
9 they were going to be addressing policy items. I for one would have us vote on this today
10 and move on and not move it to the telephonic agenda.

11 I tend to agree with Sally there are lots of questions I would like to ask
12 them and every accreditor and there are appropriate times. Northwest will be back up in
13 18 months and we can ask them all sorts of detailed questions at that time.

14 MS. PHILLIPS: Kathleen?

15 MS. ALIOTA: I would agree.

16 MS. PHILLIPS: Cam?

17 MR. STAPLES: Well I'm just troubled that we spent so much time on
18 this item and not take action and that we might again have a conversation in August. I
19 will follow the will of this group whatever that will is I have no idea at this point in time
20 but I personally don't think there's anything wrong with putting it over to August no
21 matter what happens.

1 I mean they are not here, they don't need a vote today we are not harming
2 them in any way, they will be available for questions and I think it is a decent step for us
3 to take. I don't think this in any way disadvantages them so I would still suggest and I
4 don't think we need a Motion I think we just say like with all the others, we are not acting
5 on it today.

6 MS. PHILLIPS: So at this moment we have no Motion. If there were to
7 continue to be no Motion we would not be able to take any action.

8 MR. ZARAGOZA: Can we table the actual -- the action Motion to table?

9 MS. PHILLIPS: Sure, we can Motion to table. We can just take -- you
10 know suspend it for now and bring it up at the next meeting. We have a Motion to table
11 this I think that needs a second. Those in favor? Opposed? Absention?

12 **NACIQI RECOMMENDATION:** Motion carries.

13 We will move the remainder of this consideration of this compliance report to the
14 telephonic meeting to be scheduled at a time yet to be determined.

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1 **NATIONAL COUNCIL FOR ACCREDITATION OF TEACHER EDUCATION**

2 We do have one more that we want to try to get in before we lose quorum which I believe
3 is going to happen shortly. This is the set of reviews under 34 CFR 602.33 for failure to
4 submit a renewal application under 34 CFR 33.02 31A. The National Council for
5 Accreditation of Teacher Education -- the companion piece to that is the review for the
6 Teacher Education Accreditation Council Accreditation Committee. The Primary
7 Readers for these issues are Kathleen Sullivan Alioto and Richard O'Donnell,
8 Department staff is Steve Porcelli. We can begin this conversation by asking the Primary
9 Readers to introduce it -- we will move to the Department staff I don't believe we have
10 any third party commenters but we will need Committee members back in the room to
11 maintain a quorum to be able to vote.

12 So at this point let me invite the Primary Readers to introduce the Agency.

13 MS. ALIOTO: The Teacher Accreditation Education Council merged
14 with the National Council for Teacher Education in 2013 to form the Council for the
15 Accreditation of Education preparation or CAPE. I move that we accept the staff
16 recommendation that we withdraw recognition from --

17 MS. PHILLIPS: If you could withhold your Motion until we have heard
18 from the staff but thank you, staff?

19 MS. ALIOTO: Okay.

20 MR. PORCELLI: We will take NCATE first. Good afternoon I'm Steve
21 Porcelli of the Department's accreditation staff. The staff recommendation to the senior
22 Department official regarding the National Council for Accreditation of Teacher

1 Education or NCATE is to withdraw recognition from NCATE and remove NCATE from
2 the public's list of nationally recognized accrediting bodies effective on the date of the
3 official notification letter from the senior Department official.

4 The staff recommendation is based on the fact that NCATE has ceased to
5 exist as an independent accrediting agency and the Agency failed to submit a renewal
6 application under 34 CFR 602.31A. I would be happy to answer your questions, thank
7 you.

8 MS. PHILLIPS: Primary Reader questions for staff?

9 MS. ALIOTO: My one question is the new Agency CAPE you don't have
10 listed in the score card and I'm wondering what happens to the accreditation of teachers.

11 MR. PORCELLI: The CAPE is not recognized at this point that is why it
12 is not on the score card. They are still developing their processes and procedures and
13 hope to be before you -- you know they are doing accreditation of teachers so that hasn't
14 stopped but they may come before you next spring possibly.

15 MS. ALIOTO: What's happening to the people who want to become
16 teachers in terms of Title 4 money?

17 MR. PORCELLI: All NCATE and this will go also for TEAC the next
18 Agency they are all institutions accredited by an institution accreditor so that's how the
19 students are accessing Title 4.

20 MS. ALIOTO: Thank you.

21 MS. PHILLIPS: Art?

22 MR. KEISER: That was my question.

1 MS. PHILLIPS: In the presentation that you just made was just for
2 NCATE?

3 MR. PORCELLI: NCATE yes just to keep the record clear.

4 MS. PHILLIPS: Correct. We can entertain a motion but we are not able
5 to vote on it at this time. So you can make a motion for NCATE?

6 MS. ALIOTO: I move that we withdraw recognition from TEAC and
7 remove TEAC from the published list of nationally recognized accrediting bodies
8 effective on the date of the official notification letter from the senior Department official.

9 MR. KEISER: I second.

10 MS. PHILLIPS: Would it be acceptable to substitute the name of the
11 Agency in that we have before us two separate items. One is NCATE that's the one that
12 is before us right now, the one that is labeled TEAC will be up in just a moment we just
13 have to consider it separately.

14 MS. ALIOTO: Okay withdraw recognition from the National Council for
15 Accreditation of teacher education from the published list of nationally recognized
16 accrediting bodies effective on the date of the official notification letter from the senior
17 Department official.

18 MS. PHILLIPS: And I think that is seconded by Arthur?

19 MR. KEISER: Yes I second that.

20 MS. PHILLIPS: Any discussion? We are not quite yet -- we need to get
21 one more in the room before we can take a vote. We need 10. So would anybody like to
22 discuss further? This actually will be our last item, actually the next one will be our last

1 item assuming that we have a quorum that comes back in to vote on it in which case it
2 would be great, we need one more.

3 MR. WU: While we are waiting could we take a minute and talk about
4 this phone call and schedule, what are the parameters?

5 MS. PHILLIPS: Sure as part of the discussion on this Motion I would be
6 delighted. Jen do you want to speak a little bit about the housekeeping details on that
7 meeting?

8 MS. HONG: Are you talking about the scheduling Frank?

9 MR. WU: Right, yeah, yeah I'm just wondering -- it's not like it's an all-
10 day thing, it's an hour or two -- two hours something like that.

11 MS. HONG: Well we were doing -- we have to observe our review
12 procedures for the remaining agencies.

13 MR. WU: So you actually are talking maybe all day. If we are doing the
14 full-blown because some of these agencies have lots of commentators.

15 MS. HONG: No.

16 MS. ALIOTA: One of them had three.

17 MS. HONG: There was one that had three and that was it but again it is
18 ACCSC, COE, TRACS, the osteopathic group and now Northwest. Yes.

19 MS. PHILLIPS: Just to clarify the meeting which we don't know when
20 will be -- it won't be like a 2 hour thing it will be probably several hours and perhaps a
21 full day. But you will be at whatever your location is. We have a quorum back again so
22 we do have a Motion on the table concerning the failure to submit a renewal application

1 for the National Council for Accreditation of Teacher Education. You will see that
2 Motion that has been made and seconded on the screen, any discussion -- Bobbie?

3 MS. DERLIN: We just need to update this because this says it is for
4 NCATE and the narrative says it is for TEAC so you just need to correct that it should
5 say NCATE in the two places.

6 MS. PHILLIPS: Ralph?

7 MR. WOLFF: I'm sorry I was out of the room so this may have been
8 covered but I just want to make sure that the programs or actually the students and the
9 programs that were accredited by TEAC they will now move over to CAPE so they are
10 all protected is really what I wanted to know?

11 MR. PORCELLI: Yes.

12 MS. DERLIN: This is a programmatic agency.

13 MS. PHILLIPS: Just one other question. I know that there are other
14 federal purposes like the Race to the Top money that institutions are eligible for if they
15 are accredited by the existing accreditors, are those funds at risk?

16 MR. PORCELLI: The main interest in federal funds for these two
17 agencies is the TEACH grants and it is my understanding that they can obtain those
18 monies through an approval from their state so at this time they don't need to be part of a
19 nationally recognized accrediting agency as long as their state approves them that's a way
20 to be eligible to participate in the TEACH grants.

21 MS. PHILLIPS: So this action does not disaffect them from that
22 opportunity? Art?

1 MR. KEISER: Real quick -- there are in the Agenda there are two
2 separate issues one for NCATE and one for TEAC is this one group I'm sorry.

3 MR. PORCELLI: They have merged into CAPE.

4 MR. KEISER: But these two we want to pull both of these are there two
5 separate recognitions?

6 MR. PORCELLI: Two separate withdrawals.

7 MR. KEISER: Okay so we need to make both of them, it just says one.
8 Okay so the other one was okay but we hadn't discussed that one, okay.

9 MS. PHILLIPS: So we have a Motion on the table to withdraw
10 recognition from NCATE any further discussion? Those in favor raise your hands. Those
11 opposed? Those abstaining? 2 abstentions. Okay moving on to the second piece which I
12 will ask for the staff report for the TEAC portion of this.

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1 **TEACHER EDUCATION ACCREDITATION COUNCIL ACCREDITATION**
2 **COMMITTEE**

3 MR. PORCELLI: Yes and for the record I am Steve Porcelli of the Department's
4 accreditation staff. A staff recommendation to the senior Department official regarding
5 the Teacher Education Accreditation Council Accreditation Committee or TEAC is to
6 withdraw recognition from TEAC and remove TEAC from the published list of
7 nationally recognized accrediting bodies effective on the date of the official notification
8 letter from the senior Department official.

9 The staff recommendation is based on the fact that TEAC has ceased to
10 exist as an independent accrediting agency and the Agency failed to submit a renewal
11 application under 34 CFR 602.31A. I would be happy to answer your questions, thank
12 you.

13 MS. PHILLIPS: Thank you any questions for staff concerning the TEAC
14 item. Are we prepared for a Motion -- Kathleen?

15 MS. ALIOTO: I am prepared for a Motion that we withdraw recognition
16 from the Teacher Accreditation Education Council or TEAC and remove TEAC from the
17 published list of nationally recognized accrediting bodies effective on the date of official
18 notification letter from the senior Department official.

19 MR. O'DONNELL: I second.

20 MS. PHILLIPS: Discussion? Moving to the vote those in favor of the
21 Motion as seen on the board? Those opposed? Abstentions? – 1.

1 **NACIQI RECOMMENDATION:** Thank you that completes those items thank you
2 very much. I believe that this is the moment in which we need to pause for lunch. I do
3 believe that once we do that we will lose the quorum that we have at this moment and so
4 at this time I am going to draw the meeting to a close.

5 Thank you for your patience and indulgence over the last three days. It
6 has been a very important meeting and we will look forward to hearing you on the
7 telephonic extension of this meeting and then to see those of you who will be returning in
8 December. With that I want to call for an adjournment and wish you good travels on
9 your way home, thank you.

10 (Whereupon the meeting on June 24, 2016 was adjourned at 12:47 p.m.)

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