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OFFICE OF POSTSECONDARY EDUCATION

NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY
(NACIQI)

June 24, 2016

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

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

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

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

MR. BROWN: Hank Brown.

MR. WOLFF: Ralph Wolff.

MR. STAPLES: Cam Staples.

MS. MANGOLD: Donna Mangold.

MS. MORGAN: Sally Morgan.

MR. ROTHKOPF: Arthur Rothkopf.

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

MS. HONG: Jennifer Hong.

MR. BOUNDS: Herman Bounds.
MR. WU: Frank Wu, Profession University of California, Hastings College of Law.


MS. NEAL: Anne Neal.

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

MS. PHILLIPS: Thank you all and welcome back. Today we have a bit of an adjustment in our schedule. I wanted to just give a recap of where we left off at and where we will be going today. First up we will be taking up the health group ABHES.

Second, the ATS group, third -- the veterinary group -- we expect to be losing a quorum in the middle of the day so if we have time we will also then go to Northwest and to AVMA and COE.

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

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

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

With that in mind I wanted to give a special recognition and thanks to the members who have been appointed by the Senate with terms expiring in September of
2016. We know that some of you may be back and re-appointed but for now we very
much appreciated the service of Hank Brown, Jill Derby, Paul LeBlanc, Anne Neal, Rick
O’Donnell and Cam Staples, we thank you for your service and hope this isn’t the last
time that we see you.

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

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

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

UNIDENTIFIED SPEAKER: So moved.

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

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

MS. PHILLIPS: Yes it will. Okay so we continue with the second part of
our review agenda which we have renewal applications with the pilot project questions.
The procedures again for this process includes introduction by the Primary Readers of the Agency application, a presentation by the staff for a briefing. The Primary Readers -- questions of the Agency including the pilot questions -- other questions by NACIQI members, any third party comments that may be their opportunity for the Agency to respond to the third party comments, opportunity for the staff to respond to the Agency and the third party comments and finally our discussion, Motion and vote.

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

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

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

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

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

The staff recommendation to the senior Department official for the Agency is to renew the Agency’s recognition for a period of 5 years. Based on review of the information and the Agency’s Petition and observation of the site visit in March, 2016
Department staff found that ABHES is in compliance with the Secretary’s criteria for recognition with no issues or concerns.

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

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

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

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

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

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

MR. YENA: Good morning I’m Jack Yena, Chair of the ABHES Accrediting Commission and with me today is Florence Tate our Executive Director and
Amy Rowe our Director of Institutional Review and Development. We appreciate the
opportunity to appear today.

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

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

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

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

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

MR. YENA: I’m sorry I will now introduce our Executive Director
Florence Tate.
MS. TATE: Good morning and I also reiterate what Dr. Yena has said that I thank you for the opportunity and I appreciate the staff’s assistance in going through this process but I also want to acknowledge my ABHES staff which is sitting beside me and they have been here every single day patiently awaiting to sit here in front of you as a team.

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

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

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

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

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

MS. TATE: Yes.

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

MS. TATE: The marketplace is changing drastically. I believe that technology is impacting how doctors you know we used to have the doctor come to the
house and now everything is done by computer analysis. Our Agency meets consistently with the practitioners in the field to find out what is happening in the field and how we can improve our processes as it relates to our standards programmatically.

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

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

MS. NEAL: Yes.

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

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

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

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

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

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

MS. NEAL: So that leads nicely into my next question. In terms of placement what is your standard and how do you insure the accuracy of information you receive?
MS. TATE: Our standard is 70%. That is the standard for retention, for placement and for credentialing and we have had that standard I believe since 1994.

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

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

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

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

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

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

So we do about 120 visits a year so the data is then also evaluated during that time.
MS. PHILLIPS: Yes opportunities for Committee members to ask questions, Arthur?

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

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

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

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

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

MS. ROWE: Sure okay as Florence indicated earlier we have a Standards Review Committee and they update standards. They meet with what we call our
programmatic accreditation committees if it is medical assistant, medical laboratory technology or surgical technology or program advisory committees and so they meet either via phone or in person once a year and they are made up of practitioners and academics and they provide us information to keep us up to date on the technology piece and then we will update our standards where necessary.

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

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

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

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

And we work very, very closely with student financial assistance. We have an Outcome Review Committee that monitors institutional members’ rates in terms of retention, credentialing and placement.
MS. ALIOTO: On the other side of the responsibility how do you -- let’s say a school was having some problems what do you do to help to support them in making the necessary changes?

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

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

MS. PHILLIPS: Ralph?

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

But when I go it is more about in your response to student achievement and the staff analysis -- it’s really all about the process of how reports are treated but
nothing about what you just described and so I would like more maybe I missed it but

I’m looking on the detailed -- I may just need more education on going to the --

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

analysis.

MR. WOLFF: Oh I was going to the detailed staff analysis okay I stand

corrected, you submitted it I didn’t read it, thank you.

MS. PHILLIPS: Other Committee questions, Anne?

MS. NEAL: Yes along that line I mean I am looking actually at

something the DOE compiled and I assume it is in the report I will go back and look but

it says here that you expect only a 70% exam participation rate and then that your exam

pass rate guideline is 70% of those 70%. How did you decide that only 70% was

sufficient for purposes of assessing their exam success?

MS. TATE: Go back to the validity and reliability that Karen

Kirchenstein talked about and how it is linked to the mission of every single institution.

We expect that our institutions in health care have a great deal of contact with health

facilities -- and the 70% is just a minimum. We have done the analysis -- bell curve

analysis and determined in terms of the mean and the median that 70% is consistent with

our review, did I answer your question?

MS. NEAL: I’m not sure.

MS. TATE: Okay we can try it again.

MS. NEAL: It says 70% participating so what happens to the 30% that
don’t participate?
MS. TATE: We do not have a participation rate.

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

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

MS. TATE: No.

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

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

MS. PHILLIPS: Thank you. Any other Committee member questions? Okay seeing none I don’t believe we have any third party comments for this Agency.

Does Department want to respond further? Okay at that point we can move into Committee discussion and vote if there is a Motion that you would like to put on the table.

MS. NEAL: I move to renew the Agency’s recognition for a period of five years.
MS. PHILLIPS: We will get that up on the screen. Do I have a second?

Second by Ralph -- so the Motion was to make a recommendation to renew the Agency’s recognition for a period of five years discussion? Ralph?

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

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

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

MS. PHILLIPS: There will be a point I will ask you to bring up again during our discussion of the pilot because I think it strikes me as an outcome of the pilot needing to have that kind of information.
Okay we have a Motion on the table that has been seconded any further discussion? We’ll call the question this will be by hand, those in favor? Those opposed? Abstentions?

**NACIQI RECOMMENDATION:**

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

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

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

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

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

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

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

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

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

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

At its June 2004 meeting the scope of recognition was extended to include delivery by distance education methodology. In 2011 the NACIQI recommended to the
senior Department that the Agency’s recognition be continued for 12 months while the 
Agency prepared a compliance report.

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

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

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

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

After staff’s extensive review of the Agency’s Petition and supporting 
documentation the Department found ATS to be in compliance with the Secretary’s 
criteria for recognition with no issues or concerns. The Department did not receive any 
written third party comments or complaints during this cycle regarding the Agency. 
Therefore the staff recommendation to the senior Department official for the Agency is to 
renew the Agency’s recognition for a period of five years. This concludes my report.
Representatives from the Agency are here today and we will be happy to answer any questions that the Committee may have, thank you.

MS. PHILLIPS: Any Reader of Committee questions for the staff? Okay.

We invite the Agency representatives to join us at the table. Welcome thank you for being here and thank you for your patience.

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

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

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

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

MR. TANNER: In response to the first set of questions dealing with outcomes may I make a statement first. My name is Tom Tanner and responding to those
questions we just want to note for the record that some of the important data presented for the Agency on the dashboard is contradictory and therefore cannot be correct.

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

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

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

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

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

That rate would be higher but about 70% of our students are older, over the age of 30 and are fastest growing demographic are students over the age of 50. Most
of those students work and attend part-time so it takes them longer to complete a typical 90 credit Master of Divinity.

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

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

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

One finding that has emerged is that student debt has no necessary correlation to tuition costs since most seminarians are older students with families who borrow for living expenses. And regarding payment rates -- among the 71 schools for which we serve as the title for gate-keeper the average default rate is 5.4%. We have no member schools that exceed or even come close to federal threshold.
We also have no member schools that are under heightened cash monitoring status, so those are some of the -- hopefully in response to your question.

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

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

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

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

MR. TANNER: Since our last renewal recognition in 2013 the Commission has made 1,338 accrediting decisions affecting all but three of our 245 institutions. Some 80% of those involve either substantive changes mostly for new
programs or routine reports to help schools improve, mostly as related to assessment of
student learning.

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

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

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

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

MR. ALESHIRE: I was here 5 years ago when we had a number of issues
we were asked to address. There are two ways in which we handle with the size staff that
we do. The Commission maintains a memorandum agreement with the Association that
provides a lot of indirect services so the Association maintains the database that has two full-time staff persons that manage it.

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

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

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

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

MR. ZARAGOZA: Thank you.
MS. PHILLIPS: Further questions for this Agency, Kathleen?

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

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

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

MR. TANNER: I might also add that in 2014 we published a new booklet
guide on assessment of student learning for our member schools and we followed that up
with a number of webinars and workshops and school by school counseling and coaching
in that area and that has seen a significant improvement in our schools ability to assess to
the learning such that the number of negative actions taken by our Board about student
achievement has dropped by roughly one-third since the publication of that document.
MS. ALIOTO: I am also just curious if you have Catholic, Jewish, Muslim or what is the breakdown of your --

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

MS. ALIOTO: Any Jesuits?

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

MS. ALIOTO: How about nuns?

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

We do not have schools for the education of women religious primarily because they work in a variety of ways and those that are working in parish or other kind of religious context other than schools or social service agencies or that sort of thing attend other Catholic seminaries but there are no seminaries specifically for women religious.
MS. PHILLIPS: Other Committee questions, Ralph?

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

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

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

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

MR. ALESHIRE: When I came to ATS about 80% of the U.S. institutions were both regionally and ATS accredited and we had cooperative agreements with all 6 of the regionals about how we would do joint visits based on a common self-study that addressed the standards of both agencies. Given the expectations of unique training strategies, of independence of decision-making as you have noted Val all of those have dissipated with the exception of one agency that -- one regional agency that we continue to do some joint visits with.
With others we have done concurrent visits but for the most part the effort to do joint visits has been eliminated primarily as an effort for both -- regional agencies and ATS to meet Department expectations.

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

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

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

So our students are paying their loans. Tom mentioned that we are coordinating grants of totaling 15 million dollars that literally the endowment has made to ATS member schools to try to help students deal with financial literacy and figure out how to reduce that. Debt is a problem for persons who go into low paying human service professions and we are working very -- but we don’t have any strategy of schools because if the student can demonstrate that they need the full need the school can’t say no you shouldn’t borrow that much.
So we are faced with the administration of a loan program that prohibits schools from limiting the amounts that students can borrow and that they are in effect borrowing more than is good for their subsequent work. So we have students -- the worst case are that they reach graduation and they can’t go into ministry because they have to find a higher-pay work and they are sufficiently morally responsible, they are basically going to pay their loans.

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

MR. TANNER: One other thing I might add is that our sister organization AKS was just awarded last year 6 million dollars again by the Lilly Endowment to research over the next 3 years educational models and practices among theological schools and we intend to use all of that information that we are gathering from all of our schools to help us in the redevelopment of our standards which we hope to launch after that project is completed.
We even have peer groups looking at things like competency based education for theologies.

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

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

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

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

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

MR. ALESHIRE: And we knew that the excel file was correct it was the translation to the pictures to the graphs.
MS. PHILLIPS: Thank you Jennifer for that clarification. Any questions for this Agency? I believe we don’t have any third party comments, any Departmental response to the Agency so we can move to Committee discussion, Motion and vote. Are the Primary Readers prepared to advance a Motion?

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

MR. ZARAGOZA: I second that.

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

NACIQI RECOMMENDATION:

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

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

MR. ALESHERE: I think that ATS institutions -- we don’t have a formal definition of at-risk but we have a practical definition and that is that they are showing up
at some point of monitoring accrediting intervention which for us will either be finance or
assessment or governance those are the three areas.

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

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

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

Okay in the next portion of the Agency reviews we now turn to the
agencies that have submitted compliance reports or other reviews under the regulations
for these that are not involved in the pilot projects the procedures revert to our standard
primary Readers introduced, Department staff provides briefing, Agency representative
provides comments, any third party comments, Agency response, staff response and then
our discussion and the vote.
AMERICAN VETERINARY MEDICAL ASSOCIATION, COUNCIL ON
EDUCATION (AVMA)

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

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

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

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

The COE of the AVMA was on the Commissioner of Education’s first list of nationally-recognized accrediting agencies published in 1952 and its recognition has been renewed periodically. The Agency was last granted a period of recognition for five years in 2007.
The COE of the AVMA was last reviewed for recognition again in December 2012 and at that time the Agency was asked to prepare a compliance report. This analysis currently is the subject of the compliance report which has been recently submitted as the result of good cause extension in March of 2015 and I will now pass this on to staff for further illumination.

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

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

The Agency adequately addressed all of the staff concerns from the Fall 2014 compliance report and there are no outstanding issues remaining for this Agency. The Department received over 200 written comments in regard to this Agency from practitioners, educators, educational institutions and state veterinary medical associations. Approximately 5% of the comments received were in support of the Agency siting the Agency’s strength in curricula, excuse me, and flexible delivery including the expansion of course offerings and new teaching methods.
The supportive comments referenced that the Agency is broadly accepted throughout the educational community and recognized as the most appropriate accrediting Agency for academic veterinary medical programs. Further comments asset that the application and changes to standards of accreditation are handled in a manner that assures that accredited colleges and schools of veterinary medicine produce qualified entry level veterinarians.

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

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

The Agency also provided clarification on the attainment and use of five year trend data to review attrition and placement rates. Finally some written comments reference concerns about conflicts of interest in its response to the compliance report the
Agency provided additional information about its conflict of interest policies, in
particularly the removal of a member. The Agency included extensive documentation
related to its Code of Conduct, conflict of interests and removal of member policies,
training on conflicts of interest and circumstances surround the removal of a member.

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

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

MS. PHILLIPS: Thank you, Frank?

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

So there are some critical third party commentators and at the very end of
the final staff report in the very last paragraph staff writes the following: That 17 to 24%
of respondents to the accreditation survey ranked student debt, number of veterinarians
practicing in the United States and average salary as among the top three items that
should be considered when establishing and implying educational standards so -- once
again debt, number of vets out there and salaries so these are all about the work place.

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

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

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

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

MS. MORGAN: Well as you know in general we can’t prescribe
standards for agencies or say they have to have this one or that one. I would defer to
Nicole about what she specifically meant by that in particularly in a program like this that does lead to an occupation. Placement is important so some of the issues that are you talking about seem to be something that could be addressed under for example student achievement standards.

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

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

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

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

MR. WU: Great so am I hearing correctly the following: It’s entirely permissible for us, NACIQI, to ask questions about the employment market, you are nodding yes. And it is entirely permissible for third parties to talk to us about it but not
permissible for us, NACIQI, to direct an Agency to write a regulation specifically about employment and to tell them what the employment numbers have to be?

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

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

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

MS. MORGAN: I guess that kind of thing it seems a rather tenuous connection and I suppose if you had 500 people come against an agency you could consider it as far as whether the agency is widely accepted. But as you know we don’t say you have to be accepted across the board.
MR. WU: Great this is very useful thank you. I deliberately asked this of staff now before the third party commentators because I think it will frame it nicely.

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

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

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

MS. PHILLIPS: Thank you. I’m sorry Anne?

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

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

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

(Whereupon a 15 minute recess was taken to reconvene this same day.)
MS. PHILLIPS: Let me invite you all to return to your seats, conclude your conversations. My apologies for a misspoken statement right prior to the break. Our next step in this review of the compliance report is to hear from the Agency so I would like to invite the Agency representatives to join us at the table. Thank you much and thank you for your patience.

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

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

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

The American Veterinarian Medical Association as you have heard through its Council on Education and its predecessor has been accrediting veterinarian medical education programs in the United States since 1906 and it was on the first list
recognized by the Department of Accrediting Agencies in 1952. The Council is a programmatic accreditor and as such is not required to be separate and independent although as you probably noted from some third party commenters there’s a believe that it should be.

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

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

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

This is the single bright line student achievement standard used by the Council. In 2015 99.7% of the graduating seniors of the U.S. veterinarian colleges took the licensing exam and 97% passed. Further the placement rate for graduating
veterinarians is very high with more than 95% employed or seeking further specialized training within their first year. In 2014 the unemployment rate for veterinarians nationally was 4.5% which is lower than the national average and lower than the natural unemployment rate for the U.S. In an independent survey in 2015 there were no significant differences found between accredited programs, in program quality, outcomes assessment of competencies, under-employment or income earned.

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

The Council acknowledged that directive and has worked diligently over the past 18 months to listen to and where appropriate address those concerns. This has involved a multi-faceted approach of one -- facilitated public listening sessions at professional meetings, the transcripts of which were made publicly available. Two -- an opportunity for students to participate in discourse on accreditation; three -- a number of surveys to assess understanding of accreditation, the appropriateness and relevance of the standards for evaluating veterinary education quality and the importance and value of accreditation and the COE’s performance in application of those standards.
Four -- enhanced opportunities for the profession and the public to comment on accreditation. And five -- a series of printed and electronic media communications to educate the profession on accreditation and the rationale for decisions by the Council.

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

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

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

In closing we thank you for the opportunity to appear today and appreciate the Department’s thorough review of the Agency. The Council is better and stronger for those recommendations and remains committed to continuous quality improvement. We would also sincerely thank Dr. Jennifer Hong, Dr. Nicole Harris, our U.S.D. staff analyst
and Mr. Bound for their guidance in the development and submission of our compliance report. As noted in the staff report the Department found that the Council was in full compliance with all of the recognition requirements and we hope that NACIQI will agree with our assessment and grant the COE continued recognition, thank you.

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

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

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

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

The first two sessions were conducted as facilitated listening sessions. The Council then took those transcripts from those meetings synthesized the comments and in the third meeting which was held at the National Convention started that facilitated listening session by providing a response to the comments that it had heard.
There was some division of labor there because as was noted by Frank earlier some of the issues that were raised were felt to be issues for the profession and not for the Council and so to launch that third session members of the Board of Directors of the American Veterinarian Association addressed those issues that were considered issues for the profession.

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

MS. DERLIN: That answers a portion of the question. The other piece I am interested in and then I have a follow-up is engagement of members of the general public -- you mentioned there were opportunities for anyone to comment. Did anybody?

Just everyday people on the street -- I love my vet?

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

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

MS. DERLIN: I’m not surprised by this but I was just wondering. As a follow-up I would like to ask, who facilitated the sessions? I know in the third session you mentioned the Board for the AVMA managed part of the session and members of the
Committee or your Council managed part but in the earlier sessions who were the facilitators?

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

MS. DERLIN: Thank you very much.

MS. PHILLIPS: Frank?

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

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

MR. PASCOE: So just to be clear you are asking what the view of the American Veterinarian Medical Association is -- I’m going to let John field that one. But while he is thinking about his comment I will say that that varied emotion just like everything else in higher education is suffering from increasing costs of tuition, there is
substantial concern within the profession and has been for some period of time and
several months ago there was a national summit held at Michigan State University with
representatives from across the profession including industry and government academia,
student representatives, recent graduates and it was a two day summit that was
specifically organized to address how we as a profession and the Council was represented
there as well can tackle this issue.

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

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

MS. DERLIN: I would like to pursue a little bit more some of this
diversity of opinion about things that you have going on. In reviewing the material,
reviewing some of the comments that were submitted in writing I am not entirely clear if
this is very much focused on a single institution or if it is very much focused on a number
of institutions that use a different means of delivering its curriculum and pursuing the
study -- field of study.

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

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

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

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

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

MR. PASCOE: So let me take a run in a couple of directions. We have
two new schools that are developing that the Council is working with in the U.S. We
have a third one that has recently initiated that process. The overall applicant pool is relatively static so that’s on that side of it. On the other side of it we -- there was a clear dip during the financial recession or financial crisis and there were concerns -- legitimate concerns I think at the time about whether there was an over-supply of veterinarians. I can tell you that in the last two years that’s changed dramatically.

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

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

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

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

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

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

MR. BROWN: So it’s great that you take time to serve your profession.

For many, many years I have talked to students who have extraordinary outstanding academic records who can’t get into veterinarian medicine school. Many with straight A’s who were turned down and then go on and get a Master’s in biology or chemistry or related field hoping that will get them in and many of them don’t get in.

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

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

There’s only the one school in the U.C. system. There’s a second school that’s a private school in Southern California and despite the fact that both of those schools preferentially take California residents, more than 100 California residents are admitted into the other 26 veterinarian schools in the United States annually probably because of their academic qualifications, probably because there are no more seats in California.
And California as net importer has been in the 40 years I’ve been in California of veterinarians to the states we train less than a third of the newly licensed veterinarians each year.

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

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

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

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

MS. PHILLIPS: Other member questions for the Agency at this point.

Okay thank you we are going to move to the third party comment at this point and we will be inviting you back for further comment. Our third party commenters I am going to just give you a -- invite the first speaker to the table and let you know who is on deck.

We have several commenters the first commenter is Carl Darby with Sheila Allen on deck. Is Carl Darby here? Sheila Allen is here as she is approaching the table the rules around third party comments are that you have three minutes to speak. We do have a timer and the little box in front of you will bleep at you when you have reached your three minutes.
When you speak please make sure that you have pressed the button and the mic is on. We may have questions for you after you speak so our speaker here is Sheila Allen welcome thank you for joining us.

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

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

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

The COE has accepted input from NACIQI and from its stakeholders and responded to that input. For example, changing the method of appointment of members and separating COE members from the site visit process. At no point during my service on the COE did I detect any interference of influence from the AVMA leadership.
Nevertheless in an effort to remove even the perception of conflict the

COE no longer allows the AVMA leadership to observe activities and meetings or in site
visits. The COE is affiliated and subsidized by the AVMA and the AVAMC and this is
ture for accrediting agencies from multiple health professions.

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

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

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

MS. PHILLIPS: Thank you very much. Questions for this speaker?

Thank you for joining us. The next speaker on the list is William Tyrrell with William
Kay on deck. Welcome, thank you for joining us.

MR. TYRRELL: Thank you for having me. Dr. William D. Tyrrell and I
have received my DVM from Virginia Tech, the Virginia College of Veterinarian
Medicine in 1992 and became board certified by the DACVIM in 1999 in the specialty of
cardiology.
I am actively involved in organized veterinary medicine as the past President of the Virginia Veterinary Medical Association, a past President of the Virginia Maryland College of Veterinary Medicine Alumni Society and a past delegate for the Commonwealth of Virginia in the AVMA House of Delegates as well as a member of Ref Com 3 whose oversight was education within the AVMA House of Delegates.

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

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

This offers us significant time to evaluate the students with spending 5 days a week for 2 to 3 weeks at a time. This gives us unique insight into each individual student and graduate’s clinical knowledge, clinical techniques and their ability to communicate with both me and the client. I am here to tell you that our current students
and graduates are not deficient in any capacity as it relates to medicine and/or cardiology and they are likely a hell of a lot smarter than I was when I graduated in 1992.

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

Arguments have been made that the COE inappropriately accredited such schools without what others deem appropriate and traditional teaching hospitals.

Veterinarian education is changing and will continue to change. We all feel we had it tougher than the previous generation, we all feel we walked uphill both way to vet schools.

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

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

MS. PHILLIPS: Thank you questions, Frank?

MR. WU: What in your view accounts for the hostility of some of your colleagues to the COE?
MR. TYRRELL: To be honest with you I am not quite certain. I do know that there was some argument over the AVMA’s Board of Directors distancing themselves from the COE. As a member of the HOD as well as Rough Com 3, 3 resolutions came before our Committee, all of those were soundly defeated by the HOD. Those resolutions intended to either disband or put a moratorium on accreditation of the COE and I personally am satisfied with those fire walls that have been put in place. I think economics also drives some things through a recession there are certainly some areas of our country that haven’t recovered and I believe some of that has been perceived as an oversupply of veterinarians is also driving this matter.

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

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

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

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

MR. TYRRELL: Thank you ma’am.
MS. PHILLIPS: Our next speaker is William Kay with Paul Pion on deck.

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

MS. PHILLIPS: Welcome.

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

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

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

Formerly Western University had hundreds of sites they narrowed that down to 51 so-called core sites. But the core sites in the policies and procedures manual of the AVMA Council Education must meet the standards of accreditation. Most of the
core sites are veterinary practices and most of those sites do not conduct research which is a standard of accreditation.

So by definition Western University ought not to have been accredited.

There have been comments as to whether those of us who are critics and I am of course one, we have never made a comment about the quality of any individual or any group of individuals from Western University, end of story on that point.

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

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

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

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

MR. KAY: I guess that’s a legal term, I’m not an attorney that in order for the second removed Council member, Dr. Mary Beth Leininger, the first female AVMA President had to sign an extensive document. The reason I know that is that I know that I have seen the document -- that it was very confidential but it was extensive.
It was the same basic document that I was asked because we both had the same attorney. And so what she can and cannot do must be in that document but what I do know is that in the last 6 years 42% of all of the visits to veterinary schools and therefore of the activity of the Council is foreign -- from foreign colleges.

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

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

MR. KAY: Thank you.

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

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

These meetings were poorly organized, poorly advertised and poorly attended. They did not succeed in allowing COE to hear or address the concerns of many in the profession. AVMA has publicized changes to address 6.02.15.A6 clear and
effective controls against conflicts. These changes do not materially diminish the control that AVMA has over the COE.

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

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

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

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

Dr. Leininger is driven by a desire to serve her colleagues, profession and the guidelines set up by the Department of Ed. Her concerns are a matter of record from
the 2014 NACIQI hearing. Despite AVMA and COE’s public relations campaign to
convince the profession and NACIQI that all wrongs have been righted it is clear that Dr.
Leininger’s concerns with AVMA and COA have not been adequately addressed.

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

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

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

MR. PION: Thank you.

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

MR. NEWMAN: My name is Jeff Newman I am a veterinarian, I am a
general practitioner here in the northern Virginia and Maryland region. I am a past
President of the Virginia Veterinarian Medical Association. I am speaking on their
behalf as well. I am an owner in an 8 practice group and I employ over 30 veterinarians
10 of which that come from schools that are in question. I would argue that the quality of veterinary medical education is at probably the highest it has ever been.

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

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

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

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

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

MR. NEWMAN: Different veterinary schools that have been accredited from some of the countries outside of the United States.
MS. PHILLIPS: Thank you.

MR. NEWMAN: Thank you.

MS. PHILLIPS: Other questions, Frank?

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

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

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

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

MS. PHILLIPS: Art?

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

MR. NEWMAN: I’d like to invite anyone to come over to my practice which is walking distance from here. You can meet two of these veterinarians in
question and I’m sure they would be able to answer any questions you might have, thank you.

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

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

MS. PHILLIPS: Yes that’s fine.

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

I am a graduate of the University of Florida -- College of Veterinary Medicine and the University Of Minnesota School Of Public Health. I have practiced veterinary medicine for 30 years and hold licenses to practice in Connecticut, Florida, Massachusetts and New York. I am past-President of the Connecticut VMA, the New
England VMA and the National Alliance of State Animal and Agricultural Emergency Programs.

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

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

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

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

Point number 4 -- the inclusion of practitioners on the Council in Education insures that employers and graduates have matched expectations. This aspect
is critical to maintain the relevance of a veterinary education to the actual work most graduates are expected to perform.

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

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

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

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

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

I have served as President of the Association of American Veterinary Medical Colleges, the AAVMC and the American College of Veterinary Clinical Pharmacology. I am a past member and Chair of the AVMA Council on Education. I am speaking today on behalf of the AAVMC and here in the audience today is another
AAVMC colleague, Associate Executive Director of Institutional Research and Diversity Dr. Lisa Greenhill.

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

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

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

And again our unemployment rate is very, very low. Many refer to COE accreditation standards with pride and rightly observe that our system of accreditation has set global gold standards for veterinary medicine. As evidence of that respect in support I am also speaking today on behalf of a Massachusetts Veterinarian Association and the Maine Veterinarian Medical Association and I have letters from both of those groups.
These groups with well over 1,000 members collectively expressed to this Committee in 2014 their support for the COE. They continue to believe that the COE is broadly accepted throughout their membership as the appropriate accrediting Agency of veterinary medicine. They believe that high COE standards promote quality graduates who meet the needs of the public and their animals and again you heard from Dr. Goldman via me that the Connecticut VMA feels the same way.

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

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

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

MR. OWENS: Good morning I am Dr. Jerry Owens a 1971 graduate from the University of California Davis Veterinary School and a diplomat at American College of Veterinary Radiology and I have been in private referral practice in the San Francisco area since 1976. During that time I have provided referrals especially and consultation
services to over 1200 veterinary hospitals and more than 10,000 veterinarians in the last
40 years and I worked with graduates from the veterinary schools throughout the world.
I have observed a significant decline in the observed clinical skills and
clinical knowledge of any veterinary graduates -- new graduates. Most severe in the last
10 to 15 years and most often in veterinarians you graduated from veterinary schools
without on-campus teaching hospitals.
It is my feeling that a veterinary student should be exposed to a veterinary
hospital throughout his or her four years of training as part of a well-rounded education
that would include animals with routine and difficult clinical illness at the same time
being exposed to a variety of specialists, researchers et cetera.
I was fortunate to have graduated from Davis where I was exposed to
many different animal species, specialties and research which had a significant impact on
my career as a practitioner and as a specialist and in my voluntary participation of many
clinical research studies which ultimately resulted with the production of two textbooks
and many scientific articles.
I implore you to reconsider the processes used by the COE to accredit
veterinary schools that are available to U.S. citizens that basically don’t have teaching
hospitals. It is inappropriate that the COE in part should be even directly associated with
the AVMA. And I would also like to add a couple more points -- about half of the
NACIQI members here today are new since the last time that there was a hearing on this
subject with the AVMA as the only approved scientific accrediting body were before
then.
From what I can gather so has the staff person for your Committee -- thus those of us who are here today believe that we need additional time to revisit the prior COE deficiencies and make everyone on the Committee aware that many still exist. In fact we are convinced that they have not been handled sufficiently to be granted full status as the profession’s only accrediting body without further action.

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

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

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

MR. OWENS: Mine -- small animals.

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

MR. OWENS: No there is an increase.

MR. BROWN: There is an increase?

MR. OWENS: In the ones that have been certified in the last 15 years are all without teaching hospitals. Well I can say I can think of four in the wings.
MR. BROWN: Yes I was trying to correlate the decline in capability that you have observed with the number of teaching hospitals but the number of teaching hospitals has gone up?

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

MR. BROWN: I see.

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

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

MR. OWENS: Oh you are welcome thank you.

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

MR. ROBINSON: Thank you. I want to thank everyone for allowing me this time to speak to you. I’m Walter Robinson. I’m just a little insignificant veterinarian well actually I’m a veterinarian from South Carolina and have been for 40 years. The first order of business would be I request a little longer time to give you my remarks as I have from South Carolina and I can’t talk as fast as you and your colleagues.
And with all due respect to my esteemed colleagues from other areas of the country I disagree with some of their conclusions. I have been a representative from the South Carolina Association of Veterinarians where I served on the VMA House of Delegates for 18 years. And during my time in that capacity I observed the following:

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

In recent years as proper accreditation of veterinary schools has occupied ever-increasing amount of time for the delegates with the ever-increasing confusion and controversy among the licensed veterinarians in my state. One main question from my South Carolina colleagues is, why does the AVMA accredit foreign veterinarian schools? In my opinion the AVMA has obfuscated the responsibility that the Department of Education requires of them to create an independent Council on Education that focuses on the quality of education for today’s graduating veterinary students.

The accreditation process should be totally separate from the AVMA. It would be best served by another group such is the American Association of Veterinary State’s Boards which has no bias or agendas.
As an AVMA member I appreciate the efforts they have done to fill the needs of a wide variety of members of the organization. Hell I’m convinced that the COE and the veterinary profession need a great deal of additional transparency before the COE can fully understand the Department of Education rules and policies and thus becomes unable to fill its role as the only accreditor of veterinary schools in the United States and abroad without conflicts of interest, thank you so much even without more time, thank you any questions?

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

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

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

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

I have also been active in the Virginia Veterinary Medical Association and other activities throughout my entire career. I have started the Pender Veterinary Center with my partner Don Powell a Cornell graduate the same year ’69 in 1971. We have since grown it into a 30 veterinary practice, 30 DVM veterinary practice. It is a non-
specialty practice, a general practice 24 hour emergency which includes a specialty exotics program.

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

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

We have also hired students from the island schools the accredited veterinarian schools St. George’s and Ross and specifically because they seem to have a strong foundation in exotic veterinary medicine than non-traditional dog and cat practice. They seem to be just as well prepared academically and clinically and are prepared for the veterinary entering the veterinary work force.
As both a practitioner and employer of veterinarians I believe strongly in a rigorous and yet fair accreditation system of academic veterinary medicine as well as a clinical training in order to insure consistency in the standards of education. Veterinarians as they proceed down the road towards licensure the accreditation process of the COE in my opinion has done an outstanding job in ensuring the quality of education of students as they receive their education.

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

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

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

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

MR. JOHNSON: Thank you.

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

MR. SEXTON: Thank you for the opportunity to participate in this Committee meeting today and to present my views. I’m a graduate of the University of
Georgia College of Veterinary Medicine class of 1978. I have been in private practice
continuously from the week after my graduation until present. During this time period I
have been involved in local and state veterinary medical associations and have held
various leadership positions including President of the Northern Virginia Veterinary
Medical Association and the Virginia Veterinary Medical Association.

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

During my time as an employer of veterinarians I have interviewed a large
number of perspective candidates and have hired in excess of 20 associate veterinarians.

My comments here today have to do with the present quality of graduates from veterinary
schools accredited by the AVMA.

It has been my impression that all graduates of AVMA accredited
veterinarian schools are afforded a good education in science, practical skills and
exposure to the various disciplines within the practice of veterinarian medicine.

Obviously there will be differences in what each individual will do with their education.
There will be differences in work ethic and communication skills but these items are not
relevant to one’s basic education.

It is my believe after years of interaction with new and seasoned
veterinarian practitioners that the basic education afforded to individuals who receive
admission and graduate from accredited veterinarian colleges and of those who receive
licensure that these individuals are capable and ready to enter the veterinary profession as practicing veterinarians.

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

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

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

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

MR. WILSON: Thank you very much. My comments are those of a veterinarian with a veterinary degree from Iowa State University in 1967 and a law degree from UCLA in 1973. I have taught veterinary law and ethics, career development and business management from 2 to 18 schools per year all over the U.S.A. and the Caribbean since 1978.
As part of that teaching one of my subjects has been personal finance and career development. I was here in 2012 when we had to extend the morning’s hearings because of the frustration of this country’s veterinarians. I apologize for the fact that because of my multi-school teaching commitments I was unable to provide written testimony prior to the deadline. I was teaching at 5 different schools 6 weeks right when your deadline was coming around to the plate.

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

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

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

The second section I’m citing Section 6.02.19B is says that consistent with the provisions of Section F the Council must fulfill responsibilities under the Title 4 of the Act that includes data on the most recent student loan default rates. I would add that
when doing this they also should provide predictive data regarding the likelihood of
changes to the default rate in the years ahead that does not exist either.

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

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

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

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

MS. PHILLIPS: I appreciate your efforts we do have a limitation of three minutes for public commenters.
MR. WILSON: I knew that and I realize that.

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

MR. WILSON: Oh by the way --

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

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

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

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

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

MR. BROWN: I would be interested in your reaction to the suggestion that we heard that a teaching hospital should be an integral part of the education of a doctor of veterinary medicine?
MR. PASCOE: So as you heard me comment earlier there’s only one accredited college in the United States at the moment that does not have an academic teaching hospital. It actually has a hospital but it has a distributed model of clinical education so it is not as comprehensive in its approach as the rest of the schools.

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

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

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

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

MS. BRANDT: The only thing that Council does have put in place areas for example if a college uses a distributive clinical model they are required to identify
what specific discipline that location is being used, they identify core clinical sites and
when this Council does a site visit the site team is required to have at least a portion of
the site team which means a minimum of two members using a standardized evaluation
form to visit every single one of the primary core sites.

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

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

DR. PHILLIPS: Further comments, Frank?

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

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

The other one you may recall at the December hearing Dr. Mary Beth
Leininger testified -- Miss Neal I believe at the time encouraged the Committee and I
apologize I can’t cite the specific 6.02 section but that was added during the December hearing in 2014 and so the Council has responded as we did in our compliance report with specific policies and practices that address the issue of suspending somebody the appeal’s process et cetera and coincident with that we also employed independent counsel who advised and helped develop the processes for that.

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

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

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

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

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

MR. PASCOE: I can answer the restriction piece. Part of that settlement agreement was that Dr. Leininger would recuse herself from discussions and vote on the accreditation of international schools and that was directly related to the fact that it was
felt that because she had publicly spoken against accreditation that it would create the
perception at the very least of bias and that it was not in the interests of the Council to
have deliberative decisions with somebody with a known or perceived bias against the
accreditation of international schools.

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

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

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

There are a number of states that because that’s in statute the practice Act
7 being opened up or there is reluctance to recognize that specific pathway of educational
equivalency.
MR. WU: So is the following statement a fair and accurate statement:

Most licensed vets in the United States have graduated from an institution you accredit but not all of them.

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

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

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

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

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

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

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

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

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

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

MR. BOUNDS: There’s really no body.

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

MR. WU: I see so it is through you -- staff but you operate as a Title 4 gate-keeper for those purposes?
MS. MORGAN: No the AVMA or whichever ones we approved would operate as the Title 4. It isn’t recognition but the regulation says that the school has to be a foreign veterinary school has to be accredited by an accrediting agency approved by the Department.

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

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

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

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

MS. MORGAN: Unlike domestic schools foreign schools don’t have to be accredited by a nationally recognized accrediting agency that is not a statutory requirement. The statutory requirement for foreign schools is that we determine that they are comparable to domestic schools under regulations to be promulgated by us.
One of the regulations we promulgated recently out of a concern I think for you know quality was that these foreign veterinary schools be accredited by an agency that we had given a checkmark to.

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

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

MS. PHILLIPS: Federico?

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

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

MR. ZARAGOZA: Yes.

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

MR. ZARAGOZA: What percent? Are students eligible for financial aid number one, they are but how many of them are?
MS. MORGAN: They are eligible if the school meets our regulatory eligibility requirements a foreign veterinary school can be eligible but only for direct loans. They are not eligible for POW and work study other --

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

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

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

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

And so this person was elected at that prior under the old system with that and that is not the system now.
MS. NEAL: So the current system is much less open is what you are saying?

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

MS. PHILLIPS: Simon?

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

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

In addition to that there is a confidential session provided for students that can come and meet with the site team to share anything and we require every college to provide the opportunity and we verify that this is done on multiple occasions during the year. The opportunity to provide confidential comments in an anonymous way to the
colleges we expect them to report that and they are supposed to report it in their annual interim reports as well.

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

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

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

MR. WU: I’ll second.

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

NACIQI RECOMMENDATION: Thank you the Motion carries.

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

MR. PASCOE: Thank you.
NORTHWEST COMMISSION OF COLLEGES AND UNIVERSITIES (NWCCU)

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

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

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

Those particular sections relate to documentation necessary to demonstrate that the Agency’s policies and procedures regarding changes of ownership meet the requirements of our approval process and I would defer to the staff for further explanation.
MS. HARRIS: Again good morning Madame Chair and members of the Committee. For the record my name is Dr. Nichole S. Harris and I am providing a summary of the review of the compliance report for the Agency Northwest Commission on Colleges and University.

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

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

Our review of the Agency’s Petition found that the Agency is in compliance with the two sections of the Secretary’s criteria for recognition. The Agency has provided sufficient information and documentation to demonstrate that it consistently adheres to the review and approval of a branch campus. The Agency attests to adherence to the site visit requirement for changes in ownership and has revised a substantive
change policy which now specifically requires that a site visit be conducted within a 6
month period after approval of a change in ownership.

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

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

MS. PHILLIPS: Questions for staff, Anne?

MS. NEAL: What is the complaint about?

MS. HARRIS: I will defer that to Herman.

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

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

MR. STAPLES: Yes thank you Madam Chair. I would support the
Department’s Motion for continued recognition for another one and one-half years which
completes the 5 year period is possible.
MS. PHILLIPS: Seconded by Bobbie Derlin. Any further discussion?

Anne?

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

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

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

MS. HARRIS: I’ll defer to Jennifer.

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

MS. ALIOTO: It says 74.

MS. HONG: That’s right 74 institutions are public less than 4 year and 79 overall.
MS. ALIOTO: Yeah so that would -- you could understand why the
graduation rates because some 2 year schools have such a wide variety of programs that
they are providing.

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

MS. ALIOTO: Okay.

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

MS. PHILLIPS: Simon?

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

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

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

MS. PHILLIPS: Simon I’m not sure if you are thinking about Northwest
or the Higher Learning Commission it was the one that you had interacted with
previously, perhaps it was both.
MR. BOEHME: Yeah you bring up a good point. I am very excited about engaging HLC at an upcoming NACIQI meeting but previously at the last Northwest you are right these are two Commissions that I would just like to have further dialogue with but thank you.

MS. PHILLIPS: Art?

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

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

MS. PHILLIPS: I have Frank and Bobbie.

MR. WU: I realize this comment will be ironic since it is made to the people who are still here but my comment is I am only surprised at how the attendance diminishes and that agencies don’t leave at least an intern or somebody to watch what’s
going on because there’s lot of stuff that happens here that would be of great interest and
the agencies that have had let’s say a bumpier ride would be really well served to stay for
the entirety of the meeting because they might benefit from seeing how other agencies are
treated.

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

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

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

And certainly should be here when they are being considered.

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

MS. DERLIN: Since we had some adjustments to our agenda are we
compelled to consider this today? Because I share the concerns that other people have
mentioned particularly nobody being here from an Agency when we in fact have
pertinent questions for them -- do we have an option to defer?
MR. WU: May I add to that to defer for scheduling reasons not substantive ones because Susan as Chair you have put over a few of the other agencies for the telephone call you know, could we just shift the order of these and take this up on the phone call?

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

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

MS. PHILLIPS: Guidance?

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

So I don’t know that it would be fair to punish them but in spite of what I said the other day about deferral if you do feel like you need to talk to them before you can affirm I would certainly support including them on the August or the telephone meeting if you want to do that.
MS. PHILLIPS: Just one point of clarification before we go to Ralph, Cam and now Arthur. This particular agency was not part of the pilot project and so it was not told that it would be asked additional questions. It was only a compliance report on only two issues so I just want to be clear that there is a different set of expectations that may well have been drawn for this Agency than for others that we have been focused on.

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

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

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

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

MS. PHILLIPS: Ralph?

MR. WOLFF: Yeah I guess I’m not clear whether there -- I’m not clear whether there was a Commission meeting and having been an Executive Director you
need to be with your Commission but I would think that one would try to reschedule or
come at a certain part of the agenda.

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

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

So I am not quite clear if we were to put Northwest on the phone call
whether they are being added to the pilot. I mean in a sense if we have not included them
in the pilot are we expecting to engage in conversations about pilot issues around risk
assessment about the use of data and the like.
I just want to prepare the Agency saying if they are going to move to the phone call are they being added to the pilot, are we asking that they add to or just say that they should be prepared for any question that a Committee member might ask.

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

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

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

MR. ROTHKOPF: Cam has I think changed the Motion which is what I was going to suggest but I guess I would make this observation. I think the world of accreditation is changing and I think the world of what we do with NACIQI is changing as well.
I would say if someone is on the calendar they have to be prepared to answer any questions and if we are going to defer I don’t think we should treat a regional or Northwest any differently from anybody else. Everyone has got to be prepared to answer questions as to what they are doing and I particularly note Simon’s comment here and I would agree with it.

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

MS. PHILLIPS: Bobbie?

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

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

MS. PHILLIPS: Frank?

MR. WU: Just a clarification. I’m not suggesting that we punish or be vindictive here, but I would make two points I know I am only speaking for myself but I
want to stress these. The first is that agencies should appear at NACIQI hearings when
they are on the agenda. I think that’s just an unambiguous statement of best practice.
And it is in their own self-interest. It would be foolish not to and they
would be better off not double booking. I understand that Board meetings are important
and we should be doing our best to schedule in advance. I am delighted to see that we
have our December date set. These agencies have more than one person in their office,
they have staff, they can send other individuals, they can make arrangements.
The second thing that I want to highlight that I thought was already
apparent when my colleague Simon said a couple of years ago there’s a new sheriff in
town and as Arthur Rothkopf just noted accreditation is changing. If anyone who
operates an accrediting agency is not aware that this NACIQI is not their grandfather’s
NACIQI they shouldn’t be operating an accrediting agency. It is so -- we need to
disseminate this and I think a lot of folks already know this but apparently out there in the
world there are still people in this business unaware that we actually are a watch dog that
is going to watch and bark and when necessary bite so that message should get out there
so I would encourage whoever here is watching disseminate that message, that’s all.

MS. PHILLIPS: So Sally?

MS. MORGAN: I just wanted to mention -- maybe I wasn’t clear earlier.
This Agency is before NACIQI on a compliance report so I would expect any additional
questioning -- I mean you can add your pilot as well but it should not be on findings that
are already closed and decided.
MR. WU: That’s entirely fair and well taken but they should be here to answer the questions that are appropriate to ask, that’s my whole point.

MS. MORGAN: Agreed.

MS. PHILLIPS: Ralph and Anne.

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

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

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

MS. PHILLIPS: Just to clarify we have had three different parts to our Agency Review Agenda. There was the Consent Agenda which was not part of the pilot,
there was the Compliance Report and other matters related to the regulations -- that was not part of the pilot and then there was the Renewable Petitions that was part of the pilot. As it happens the bulk of our agenda has been renewal petitions which are part of the pilot. But to be clear when we set it up it was three different parts only one of which was going to have the pilot component to it, at least that is what we had publicized. Whether we can add a compliance report to that pilot for the telephonic meeting I need to talk with folks about can you do that and then the separate question is I think I heard Sally say that you probably shouldn’t be asking about issues that are outside of the compliance issues. So it would be restricted to only the parts of the pilot that would be relevant to the compliance issues.

MR. WOLFF: Right.

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

MR. WOLFF: Well to me they are two separate issues then. One is are we deferring it because we want to ask questions about change of ownership in branch campuses. Personally I have no questions about that. And the staff has found that they are in compliance and so I can appreciate and would agree that it would be appropriate for people to be here but I would not and if that is the case based on what you said and what Sally has said and what Bobbie has said previously about are we focused only on what are the compliance issues -- then it is a very limited scope phone call. And so in which case I don’t know that we need to make the point about not appearing if we really don’t have questions about branch campus and change of
ownership -- I’m just saying you know maybe we are making a point. To me we’re
saying well you should have been here and therefore we are going to defer you.
But I would want to say what is more important is if we are limited in that
classification that they are going to come up in a year and a half presumably that will be
an opportunity for pretty extensive review of the other issues that are really important and
so I am just raising the question of what’s the right message and just using everyone’s
time most valuably.

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

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

MS. PHILLIPS: What was the beginning?

MS. HONG: That wouldn’t be comfortable.

MS. PHILLIPS: Would be?

MS. HONG: Would not, not, no. The Federal Register notice was very
clear including what was going to be in the scope of the pilot and what is in the scope of
the review of a compliance report so I mean we all can consider that I guess for the
meeting in December but for the continuation of this agenda I would recommend not
doing that.
MS. PHILLIPS: So that leaves us with if we were to have an opportunity
to speak with the Agency representatives it would be focused on just the two issues in the
compliance report just to be clear about that. I’ve got Anne, Art and Bobbie.

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

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

MS. PHILLIPS: Art?

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

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

MS. PHILLIPS: Possible clarification that might help with that, Art and I
am going to ask Jen to speak to the Federal Register notice. Because of the pilot this time
and specifying that these agencies would be part of this pilot it also specified what the
agencies that are not part of the pilot would be asked. So we may have set up a different
set of expectations for this particular meeting because of the pilot.

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

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

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

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

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

MS. PHILLIPS: Bobbie?

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

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

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

MS. MORGAN: We have never in any meeting told Committee members that you know shut up you can’t ask that question -- we haven’t done that. This is a little bit different in that you would be deferring rather than making a decision. Now ordinarily that would mean that you were leaving open the issues that are before the -- on the compliance report now you know there are probably maybe 50 or so agencies that you would like to ask questions about, I mean general questions about.
So I don’t really see a distinction between those agencies and this one if your issue isn’t with the compliance report.

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

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

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

Three -- this particular hearing may be slightly different because of the pilot where we have tinkered with some things and given a notice and so that may make it a little different. So to sum up based on these three things my conclusion is this isn’t black and white. No one has said under no circumstances on a phone call are you member X permitted to ask the question you want to ask.
There is just sort of a slight uneasiness on the part of staff oh if some of these members exceed the compliance report maybe that’s not such a bad thing -- but our lawyer is not saying it would be illegal and you will be drummed off of NACIQI for it.

MS. PHILLIPS: Rick?

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

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

MS. PHILLIPS: Kathleen?

MS. ALIOTA: I would agree.

MS. PHILLIPS: Cam?

MR. STAPLES: Well I’m just troubled that we spent so much time on this item and not take action and that we might again have a conversation in August. I will follow the will of this group whatever that will is I have no idea at this point in time but I personally don’t think there’s anything wrong with putting it over to August no matter what happens.
I mean they are not here, they don’t need a vote today we are not harming them in any way, they will be available for questions and I think it is a decent step for us to take. I don’t think this in any way disadvantages them so I would still suggest and I don’t think we need a Motion I think we just say like with all the others, we are not acting on it today.

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

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

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

NACIQI RECOMMENDATION: Motion carries.

We will move the remainder of this consideration of this compliance report to the telephonic meeting to be scheduled at a time yet to be determined.
NATIONAL COUNCIL FOR ACCREDITATION OF TEACHER EDUCATION

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

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

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

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

MS. ALIOTO: Okay.

MR. PORCELLI: We will take NCATE first. Good afternoon I’m Steve Porcelli of the Department’s accreditation staff. The staff recommendation to the senior Department official regarding the National Council for Accreditation of Teacher
Education or NCATE is to withdraw recognition from NCATE and remove NCATE from the public’s list of nationally recognized accrediting bodies effective on the date of the official notification letter from the senior Department official.

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

MS. PHILLIPS: Primary Reader questions for staff?

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

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

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

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

MS. ALIOTO: Thank you.

MS. PHILLIPS: Art?

MR. KEISER: That was my question.
MS. PHILLIPS: In the presentation that you just made was just for NCATE?

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

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

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

MR. KEISER: I second.

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

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

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

MR. KEISER: Yes I second that.

MS. PHILLIPS: Any discussion? We are not quite yet -- we need to get one more in the room before we can take a vote. We need 10. So would anybody like to discuss further? This actually will be our last item, actually the next one will be our last
item assuming that we have a quorum that comes back in to vote on it in which case it
would be great, we need one more.

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

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

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

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

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

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

MS. HONG: No.

MS. ALIOTA: One of them had three.

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

MS. PHILLIPS: Just to clarify the meeting which we don’t know when
will be -- it won’t be like a 2 hour thing it will be probably several hours and perhaps a
full day. But you will be at whatever your location is. We have a quorum back again so
we do have a Motion on the table concerning the failure to submit a renewal application
for the National Council for Accreditation of Teacher Education. You will see that
Motion that has been made and seconded on the screen, any discussion -- Bobbie?

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

MS. PHILLIPS: Ralph?

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

MR. PORCELLI: Yes.

MS. DERLIN: This is a programmatic agency.

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

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

MS. PHILLIPS: So this action does not disaffect them from that opportunity? Art?
MR. KEISER: Real quick -- there are in the Agenda there are two separate issues one for NCATE and one for TEAC is this one group I’m sorry.

MR. PORCELLI: They have merged into CAPE.

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

MR. PORCELLI: Two separate withdrawals.

MR. KEISER: Okay so we need to make both of them, it just says one.

Okay so the other one was okay but we hadn’t discussed that one, okay.

MS. PHILLIPS: So we have a Motion on the table to withdraw recognition from NCATE any further discussion? Those in favor raise your hands. Those opposed? Those abstaining? 2 abstentions. Okay moving on to the second piece which I will ask for the staff report for the TEAC portion of this.
MR. PORCELLI: Yes and for the record I am Steve Porcelli of the Department’s accreditation staff. A staff recommendation to the senior Department official regarding the Teacher Education Accreditation Council Accreditation Committee or TEAC is to withdraw recognition from TEAC and remove TEAC from the published list of nationally recognized accrediting bodies effective on the date of the official notification letter from the senior Department official.

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

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

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

MR. O’DONNELL: I second.

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

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

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