

**APPENDIX D – MEETING TRANSCRIPT OF THE PERSPECTIVES OF
INSTITUTIONS-THE “ACCREDITED” CONSTITUENCIES PANEL**

MS. HATTAN: Okay, great. Yes. My name is Susan Hattan, and I am here to speak on behalf of the National Association of Independent Colleges and Universities.

Actually, I am sitting in for our president, David Warren, who wasn't able to join you, but does send his greetings and regrets that he wasn't able to participate.

NAICU, for those of you who aren't familiar with it, has a membership of just under about 1,000 institutions. These are private not-for-profit range of institutions with a diversity of missions, liberal arts, research, church and faith-related, professional schools and the like.

As a consequence, we are very -- feel the diversity of higher education is quite an important thing, and it's reflected in our membership. I have been on the NAICU staff since 2003. I'm on the Government Relations staff and cover essentially regulations and other expectations of our

institutions, assisting them in finding out what the rules are and suggesting ways to be in compliance in other ways looking after issues that we have identified as being important to the independence of higher education.

Prior to joining the NAICU staff, I had a career on Capitol Hill, largely in the United States Senate, where I did have an opportunity to work on prior reauthorizations of the Higher Education Act.

Basically, if you've had an opportunity to look at my prepared testimony, what I had thought might be most helpful in terms of my formal presentation was really just to go through some of the positions that NAICU has taken in the past on accreditation, kind of where we're coming from.

Basically, we're very supportive of accreditation because we believe that it is something, the uniquely American institution that has allowed diversity of higher education to flourish in this country. As I said before, the continued strength of this diversity is something that's quite important to our membership.

There is admittedly, and I think listening to the various conversations this morning, anyone could recognize an uneasy tension between the historic purposes of accreditation and essentially the gatekeeping functions that it has kind of assumed over the years, and the demands on those gatekeeping functions continued to increase and they on many occasions reach a quite tense point.

I think probably the most recent one was certainly the last reauthorization of the Higher Education Act, and the issue of how to address student learning outcomes, in which Congress essentially determined that there seemed to be too much movement towards federal interference in that, and basically asked that that come to a stop.

Essentially in your framing document, I know that one of the questions that you raised is that should there be a set standard for student achievement? The response from the higher education community in the past has been no, there should not, and I think that remains the position today.

I also covered just a couple of things

that our Association has spoken out on on several occasions in the past. Certainly one, by the nature that we are a private institutions, there are various issues related to the state roles, that particularly are important to us.

I think that we recognize as part of the triad that there is certainly a legitimate consumer protection function states should serve. However, there's also a very careful line between how much a state government should be involved in the academic and programmatic decisions of an institution.

With respect to the other portion of the triad, the federal government's role, I would basically suggest that their role in eligibility and certification is quite important in many of the concerns that have been raised recently, and I think that it would be important as this body considers recommendations it might give to the Secretary, to take a look at the line between what is appropriate for the federal government perhaps to do and to beef up, versus things that they might ask accreditors to do.

I think that that becomes increasingly more pertinent, particularly given the cost of more frequent monitoring and the like, which is sort of part and parcel of that effort.

Finally, I'll mention in the issue of transparency and public reporting, our Association has had concerns about this, and I know that many, many people disagree with it.

So I'd like to just talk a little bit more about where we are coming from on that, and that is, and actually I believe, as was raised earlier, there is a question of whether you have the appropriate level of candor and frankness, depending on the amount of disclosure results. We worry about that from the accreditation process in and of itself.

But we also have a large number of smaller institutions that really have some fairly amazing resiliency, despite very long odds. There are other factors that come into play in terms of their continued survival.

Negative findings in the context of an overall positive ruling, in a large institution

doesn't make so much difference. In a smaller one, it can be life or death. It doesn't take that many students to read the bad article in the newspaper, which unfortunately those are the sorts of things that generally get the attention, and therefore harm the institution.

It's for that reason that we have been resistant to legislative efforts for broad disclosure of accreditation findings. We do also think that there's a question of what is actually useful to students and families.

Certainly, a better understanding of accreditation itself and what it does would be useful, and we're certainly willing to participate in efforts to do that. But we have had reservations about that.

CHAIRMAN STAPLES: I don't mean to interrupt you. We've reached our five minutes --

MS. HATTAN: Oh, I'm sorry. I didn't get the sign.

MS. LEWIS: I'm sorry. I thought we had made eye contact. I'm sorry.

MS. HATTAN: I apologize.

CHAIRMAN STAPLES: That's okay. Go ahead.

If you could just wrap up.

MS. HATTAN: Yes, okay. At any rate, I just want to close by saying that I appreciate the opportunity to be here today. I think that the virtue of higher education and accreditation is that there is a constant push to go onto higher levels and better levels of improvements. I think that this kind of examination is important, but I would just urge that you keep in mind that accreditation does support diversity and that a larger federal rules and prescriptions are not a positive direction to go.

CHAIRMAN STAPLES: Thank you. Muriel Howard.

DR. HOWARD: Good afternoon. I'm Muriel Howard, and I'm the president of the American Association of State Colleges and Universities, often referred to as AASCU. I just want to thank you for the invitation today to be here, to represent over 400 public colleges and universities, and nearly four million students, of which 50 percent of them are

minority students.

What I would like to do today is to just walk through some of the highlights in the prepared statement that I sent to you, that are AASCU's concerns on behalf of our colleges and universities that we represent. I should say that prior to coming to AASCU 18 months ago, I served as the president of Buffalo State College, which is a part of SUNY, for 13 years. As I said --

MS. LEWIS: Please excuse me, Dr. Howard. I'd just like to point out to the members that Dr. Howard's prepared statement is in the blue folder, if you want to pull it out. Thank you.

DR. HOWARD: As I indicated in my statement, I believe that the system of accreditation that we have developed over the years has worked well, but certainly as higher education expands and changes, so must our accreditation practices, and I think working together, we can certainly make those improvements.

As we all know, the historic process of accreditation has focused on inputs, and so one of

the issues that we're concerned about is how do we get inputs, become a more greater substantial concern of accreditors, and to have more attention paid to it.

In particular, I'm interested in greater attention to learning outcomes for our students, and those outcomes must be broad and narrow and ensure a strong knowledge of skills and content, as students move forward through the process, as well as an understanding about democracy and being engaged.

I think our accreditors should continue to shift the focus of accreditation from process and input-specific criteria towards these student learning outcomes. Certainly considering institution reports of learning outcomes, such as those reported as a part of the voluntary system of accountability, which was created by AASCU and APLU this year is learning outcome data.

We all need to know how this data will shape out over time. So you will hear more about the VSA on a panel this afternoon, so I won't go into it. But I would just like to say that is a system that we

need to develop and to give more time, to see how well it works.

I would also say that in terms of learning outcomes as a past college president, I took those learning outcomes and data and test scores very seriously, and many of our institutions do take the time to drill down that knowledge that is gained, to improve student learning outcomes by working closely with the faculty and staff that serve our students.

If we can shift the focus from over-reliance on input standards, then I think the Department of Education regulations also need to shift, because they too are overly process and input-specific. In doing that, the Department will need to relax its expectations of accreditor enforcement of its requirements, and rely more on its own resources for enforcement.

I believe it's appropriate for accreditors to assist the Department with the protection of the taxpayer, but only on those levels appropriate to the quality of education, and an institution's ability to offer that education, since the focus on learning

outcomes must be accelerated and substantially improved.

I'm also concerned about cost. You've heard about that. It is becoming more burdensome, both from a financial and human perspective, for an institution to continue to support the accreditation process. So an investment in technology, to help improve the process and eliminate some of the burden from institutions, is something that we need to explore.

I'm also concerned and my institutions are concerned about the practice of purchasing an institution and simultaneously accreditation, even though the faculty, the curriculum and mission is often changed or eliminated. Such a change in institutions should trigger a within-year review process for those types of situations.

Another concern is developing better mechanisms to account for rapid changes in delivery systems, program design and instructional practices, and institutions are looking at how to change course delivery, program, instructional pedagogy. So again,

through the use of technology, we need to continue to alter the ways that institutions carry out their basic educational purpose.

We will also need to ensure that accreditation processes are as nimble as the rapidly-changing educational landscape that is responsible for monitoring.

Another concern is the current process, which allows groups of institutions to gather together for self-accreditations. My institutions are concerned about that, and believe it should be examined, so that a select group of institutions, all similar in their interests, are not allowed to become their own accreditors.

The accreditation process also should not be confused with the Department of Education's responsibility to determine institutional Title IV eligibility. We know about the large amount of funds that's being invested in financial aid programs.

However, many of the requirements are legislative mandates on the Department of Education, and they're being gradually transferred to the

responsibility of the accreditor.

I think the Department of Education needs to shift its reliance from enforcement from the accreditors, and perhaps a model that requires DoE to engage institutions after the accrediting agency's reports, or review the status of an institution's accreditation would be more appropriately realigned with the role of the DoE to do the enforcement and the accreditors to do the informing.

Then lastly, I'd like to just point out that the accreditors' role in providing consumer information is ever more important as the public has a right to know what does accreditation do for them, what does it do for the institution and what does it do for the public.

So certainly more transparency, I think, in sharing this information with the public, will garner a better understanding as we reach to improve the quality of higher education through the accreditation process, which again I believe has worked well, but certainly can bode from some improvements. Thank you.

CHAIRMAN STAPLES: Thank you very much.

Harris Miller.

MR. MILLER: Thank you very much, Mr.

Chairman. I'm honored to be here, including along with my board chairman, Dr. Arthur Keiser, who is a NACIQI member. This is certainly the second most important meeting in the country this week.

The first most important meeting is the Super Bowl on Sunday, with all due respect to my friend, Ms. Anne Neal, go Steelers. As a native of western Pennsylvania and a graduate of the University of Pittsburgh, we know who's going to win that one.

I'm here to represent the Association of Private Sector Colleges and Universities, over 1,500 institutions across the United States that focus on providing career opportunities to primarily non-traditional students, though like the other associations, we represent the gamut all the way from Ph.D. and doctoral programs and medical programs, all the way down through certificate programs. Our association has been around in various forms for over four decades, and about two decades ago intentionally

separated from the accrediting bodies, at the recommendation of Congress. So that our role as an advocacy organization would be kept totally distinct from the accrediting body organizations.

I myself have not nearly the experience that all of you have in higher education. I've only been in this position for about four years and primarily before that represented the employer. So I represented the IT industry. But other than my own academic training, and seemingly to pay for my children constantly to go on to higher education, I'm not nearly as involved and as experienced as many of you are. I've never been an accreditor, served on an accrediting body. So these observations are more of an outsider.

Let me focus on four areas that I see. First of all, I think that the whole accreditation process is still very unclear to people who are key policymakers.

I'm not talking to men and women on the street; I'm talking about people on Capitol Hill, key members and staff people, who even in these times of

a lot of issues and controversy about higher education, really don't understand the role of the accreditation process, the importance of accreditation, its role in assuring academic quality, and the oversight the accrediting bodies themselves undergo.

Similarities and differences among different types of accreditation bodies is not well-understood. Differences between institutional accreditation and programmatic accreditation is not understood. Now certainly I would not expect everybody in Washington to understand the accreditation process, any more than everyone's going to understand how the Food and Drug Administration oversees drug approvals.

But certainly it does constantly surprise me now still after four years representing this sector on Capitol Hill, how many people on the Hill really still don't understand the role of accreditation. Now maybe it's because accreditation, as was discussed and other speakers have suggested themselves, aren't quite clear what we do.

But it seems to me at a minimum that anybody involved, members of Congress and their staff, should understand better what's going on. So I think that's sort of shame on us, and I'm not just blaming the accreditors. I think that's all of us involved in higher education.

So a couple of specific recommendations. I would recommend that NACIQI itself consider preparing a widely-distributed document that would be regularly made available to key policymakers throughout Washington, that would describe clearly the process of accreditation, particularly as it does relate to the issue that most members of Congress think about in this context, which is Title IV eligibility.

Secondly, I think that NACIQI should consider encouraging the accrediting bodies themselves to be more outgoing and more informative to keep policymakers on Capitol Hill and other key stakeholders around Washington and in state capitols informed.

I understand that these accrediting bodies

can't lobby; that's not their purpose. But lobbying is not the same thing as educating, and there's nothing that prohibits the accrediting bodies, on a regular, sustained basis, telling people on Capitol Hill what it is their accrediting bodies are doing, and explaining to them the kind of actions they've taken, both positively and frankly in terms of having to at times help schools go in a different direction.

If the belief is that the accrediting process is not doing this, then its credibility as being part of the triad is depressed in the eyes of the people on Capitol Hill who make these policy decisions.

Last but not least in this area, I certainly would believe that NACIQI should reaffirm to Congress that accreditation is a critical part of the Title IV eligibility process. I have a slightly different perspective than Dr. Howard expressed in terms of how aggressive we should be, but no matter how you temper that comment, the Hill needs to hear that NACIQI expects this to be important.

Secondly, I believe that there are still a

lot of confusions about expectations among the three arms of the triad, as who does what to whom, and it's unclear to the schools themselves sometimes, it's unclear to other policymakers, it's unclear to the media.

Take the issue of recruitment and admissions as an example. Everybody, all parts of the triad have some kind of laws or regulations that governs this area. But obviously the accrediting bodies see themselves as primarily interested in academic quality and program integrity.

That's not necessarily true of the public or policymakers, and there are whole questions about how does one separate academic quality from issues about whether the admissions process is working properly. So I think that anything that NACIQI can do to help encourage Congress to more clearly delineate in law and regulation, and of course that would involve the Department, which of the arms of the triad has the principle, but not exclusive responsibility for oversight of each of the parts of the student's matriculation process, would be

helpful.

Thirdly, I think that one of the problems that we have with outcomes, I am pleased to see generally a movement toward a focus on outcomes. The whole issue of measurement's a problem, so I think there's a need to focus a lot more on numbers and getting some numbers.

I still find that appalling, as a relatively new person in this world, that we talk about graduation rates based on only first time full time students, when the majority of students that are in higher education are not first time full time students.

Fourthly, I would suggest that it is time for the accreditors to think seriously about advertising more their policeman role. I know this is a very controversial subject even within my own association.

But whether the accrediting bodies like it or not, the people on Capitol Hill think that they're policemen, and either they're going to step up to the plate and accept that role, or I'm afraid some people

are going to come up with some different ideas on how there should be enforcement of some of these important elements of oversight of higher education.

Lastly, I would like to recommend that NACIQI recommend more communications among the arms of the triad. I have a sense from talking to my schools, from accreditors to government agencies, the state agencies, that the communications too often among the arms of the triad is less formal than it needs to be, and I believe that more formal and systematic communications could be helpful.

CHAIRMAN STAPLES: Thank you very much.

Gary Rhoades.

MR. RHOADES: Yes. Good afternoon. I'm Gary Rhoades. I'm speaking for the American Association of University Professors, so I guess I'm the fox in the hen house. I'm also a professor of Higher Education at the University of Arizona, where I teach and research higher education, and analyze the kinds of issues that we're discussing here, not only in the U.S. but internationally.

Currently, I have a grant with the

National Science Foundation, looking at the relationship between higher education and the workforce. So I really have -- I'm a son of a theologian, so I think in trinities. I have three sort of basic points about creative tensions with regard to accreditation.

The first I'd just like to start by saying about accreditation what Winston Churchill said about democracy. "It's the worst form of government I've encountered, but it's better than all the other forms of government that have been thus far tried in history."

The strength and the genius of American higher education is precisely its variety, its choice, its room for innovation, and at the same times at some levels its weakness. It's true that the world is not standing still, but as Eduardo said in his presentation this morning, the world is becoming more like us.

It is taking on, or trying to take on, processes within higher education that devolve responsibility to the campus level, to the faculty

and to the academic administrators on the campuses, to be the creative drivers of innovative and spontaneity in those systems, which have been paralyzed for centuries by large ministries of education. It's important for us to keep that in mind.

Now at the same time, that's sort of the weakness of our current system, which it's like that Kramer v. Kramer scene, when Dustin Hoffman is saying to the little boy as he's pulling the ice cream out, you know, "don't open that freezer. Don't open that ice cream. Don't take that first scoop."

There really are no consequences, because it's not only a pass/fail system, it's a system in which virtually nobody fails. So I think we have to acknowledge that, and we have to do something about that, which I think at some level each of the panelists have acknowledged.

It is, from the standpoint of faculty, too much of a performance ritual, precisely because of that reason. I think the process would benefit a great deal -- I know that Judith Eaton is supportive

of this and I think others as well, the more than you can get people who are in the classroom, in the departments, in the colleges working on these accreditation processes, the more meaningful and impactful it's going to be actually on student learning and learning outcomes.

The second creative tension is to find a balance. There's been some talk this morning about death penalties versus gradations of accreditation, and I think it's important here to respect the success of American higher education and of accreditation, to do no harm and to avoid the sort of goose step of everyone doing the same thing on the same day at the same time of day.

This is not what our history is about, and this is not where other systems of higher education are going. One thing I'd like to say about creative tension, though, is it's interesting that so much of the conversation is about protecting the federal dollar, but virtually no consideration in this discussion today has been about the sorts of things that Richard Arum was suggesting.

What drives institutional behavior, and where are the institutions putting resources? What we see systematically across this country in every institutional sector is we need to get back to basics. We need to move monies on balance, the delta trend line, back to educational expenditures, and away from the college equivalent of the Super Bowl expenditures, and other sort of non-educational activities. There's all sorts of data on this.

The danger will be if any federal body takes measures like that or a graduation rate, and oversteps and turns them into a simple hammer, because you will destroy the diversity and the innovation within the system, and you will create the wrong incentives.

Graduation rates suggest that institutions will move away from the students who are the growth demographic over the next 25 years, and move to students who are more likely to graduate. I think that's not what we want to do.

The final point is the tension among the various roles of Accreditation, and I've said a

little bit about minimum accountability, I think we could raise the bar and still keep minimum accountability.

The continuous improvement, I think, needs to be targeted on particular demographics of students who the institutions have been serving, because otherwise what we see is institutions moving away from those students.

I think it's important for accreditation to think not only about students in the abstract, but to think about this growth demographic over the next 25 years, that we have done least well in serving the past 50 to 100 years of this system's history.

Last thought. Consumer protection is not something, in my view, that accreditation is well-designed to get access to. I think there are other ways to deal with predatory practices and with false advertising and the like, which unfortunately does exist in higher education. I don't think accreditation is the way to handle it. Thank you.

CHAIRMAN STAPLES: I thank you very much.
Mr. Tanner.

MR. TANNER: Good afternoon. I'm Michael Tanner, the incoming Vice President of the APLU. I am myself a long-time provost. I first became provost alongside Larry Vanderhoef many years ago, and I've been in both the University of California and the University of Illinois as part of an accreditation team and as the person in charge of accreditation at two institutions.

Peter McPherson was not able to be here today, and he asked if I could come to represent him. With your indulgence, I will read the statement that he prepared. I don't know how widely it was distributed. These are the words of Peter McPherson.

"Although I cannot participate in the panel in person, I appreciate the opportunity to submit comments on the complex issues of Accreditation. I've not widely discussed with my members all the views set forth here. Therefore, these views are primarily my personal views from experience in my current position as former president of the Michigan State University, and as former executive vice president of Bank of America.

"Let me note here the thoughtful and helpful comments submitted for this discussion by my colleague, Muriel Howard, president of AASCU. I hope the entire academic community will continue to have opportunities to engage with NACIQI and the Department on accreditation matters. It is in that spirit that I offer these remarks.

"The federal government spends billions of dollars on student financial aid and there must be reasonable accountability for those funds. In my view, the question is how to avoid government-established learning outcomes, and thereby sustaining the vitality, independence and diversity in U.S. higher education, while providing the appropriate levels of accountability for federal funds.

"Now obviously we've got to patch this dude. The Department of Education, with the assistance of the GAO, should be responsible for fiscal determinations within the student financial aid eligibility process. I believe this combined effort can be implemented to achieve the appropriate levels of accountability and public credibility.

"The accreditation system was designed as the collaborative and self improvement process, to gauge and enhance academic quality as appropriate to the mission of the institution. At its core, it is a system designed to promote academic improvement and accountability. The determination of academic content and quality should remain in the purview of academia.

"The diversity and independence and vitality of American higher education makes our system the envy of countries around the world. We must avoid government-accreditor determined learning outcomes that would stifle U.S. higher education.

"Overall, accreditation has helped produce a higher education system that generally works for the students and the public. Accreditation should, as its essence, continue as a self improvement process, to enhance academic quality.

"Although I am against government-accreditor determined learning outcomes, I support substantial change in higher education. Change is occurring in many places, and it must be supported

and encouraged.

"Let me point out that change and adaptability were strongly supported in detail in a paper written after five regional conferences of APLU members, held this last year.

"Moreover, as an association of public universities, we support accountability and transparency for higher education, because of our public nature and as a means to continue to strengthen our institutions.

"In part because of the public's concern about and desire for greater levels of accountability and transparency, the APLU and AASCU created the voluntary system of accountability, the VSA, which involves monitoring and reporting certain learning outcomes.

"The VSA, with over 330 participating universities, was created as a voluntary system, because we strongly felt that measurements must be flexible enough to adjust to different needs and new information being gathered. Let me be clear. Individual institutions should measure learning

outcomes in a manner they find appropriate for purposes of self-improvement.

"It is appropriate for accrediting agencies to expect that some learning outcome measurements be undertaken by institutions. I understand that accreditors are generally taking the VSA learning outcome process into consideration, but accreditors should not dictate how measurement is done or determine expected outcomes.

"The Department of Education has ultimate responsibility under the law to make the decision on whether an institution is eligible to participate in federal student financial aid programs.

"There are a number of considerations, including important fiscal factor, such as student loan default rates, that the Department brings to bear in eligibility decisions. An institution cannot keep its eligibility unless it keeps its academic accreditation.

"Because eligibility and accreditation may in practice be contingent on each other, some observers miss the fact that eligibility and

accreditation are two separate processes. Moreover, it appears we've begun to confuse or even merge the two processes, as we have pushed the accreditation process to make fiscal factors, like loan default rates, primary factors in the accreditation process.

"I believe the front line for fiscal consideration should be the Department of Education's eligibility determinations, relying suitably on the work of the GAO. The Department should be the front line because the review of fiscal considerations should be done regularly, and not just in an accreditation cycle.

"Financial troubles should be caught early, because from my experience, financial troubles usually get worse with age, not better.

"Moreover, the Department appropriately has responsibility for the investigation of fraud in connection with financial aid. On the other hand, accreditors and accrediting teams are not generally auditors or credit officers.

"In short, the Department has or should have the ongoing institutional capacity to make the

fiscally-related decisions and the accreditors do not have comparable tools and capacity.

"Many recognize that a major challenge in student financial aid is the high default rate associated with a small number of institutions. These problems, plus low graduation rate at these institutions, are at the core of the current accountability and credibility issues.

"The matter is complex, because many of these institutions serve a disproportional number of low income first generation and non-traditional students. With these considerations in mind, the Department of Education eligibility process should deal appropriately with these institutions.

"The fiscal criteria for making eligibility decisions should be reviewed and appropriately strengthened. I would include post-graduate employment information and the fiscal information used in making eligibility decisions. Of course, this would require finding a way to gather the information. It is too costly and too incomplete for institutions to do it themselves. Perhaps

information from the Social Security Administration, with appropriate privacy safeguards, could be used.

"I know that this is complicated and controversial, but employment and earnings data are important for the public grant and lending process, and for accountability. Accreditors should be informed of this information, though I see the eligibility process as the primary users of the information."

CHAIRMAN STAPLES: Mr. Tanner, would you please summarize your remarks?

MR. TANNER: Sure.

CHAIRMAN STAPLES: We have your written materials or we will have them, if we don't have them --

MR. TANNER: If you have the material, I will, I guess, highlight quickly a few remarks. There's confusion in these two roles, and he's calling for greater clarity in who is carrying out what roles, so that everybody knows where the responsibility lies, and it can be carried out more effectively.

If one is to use graduation rates, it's important, as I think my colleague mentioned, that we look more comprehensively at graduation, not just the first students in one cohort all the way through, because increasingly students transfer in and out of institutions, and one has to look at the whole path to success.

Loan default rates are in fact an important indicator of the quality of what's going on, and accreditors should be made aware of that information, but should not have the primary responsibility for making decisions on that. With that, I think I will thank you for allowing me to present his remarks, so I can stay within my time limit.

CHAIRMAN STAPLES: Thank you very much. I appreciate all of your testimony and remarks. Questions from members of the Committee. Arthur?

COMMITTEE MEMBER ROTHKOPF: Yes, thank you, and thank you for your testimony or comments, and we have the material on the record. I have a couple of questions for Susan and NAICU. As a former

member and actually on a commission of NAICU many, many years ago, I've followed the independent colleges pretty closely.

I guess my first question is in your statement, both written and oral, you talk about the need of -- the concerns about vulnerable institutions. I think that's the term you used, that they're institutions that are smaller perhaps, or not necessarily, but are vulnerable, and they're the ones that don't want or that NAICU doesn't feel that transparency of accreditation reports is appropriate there, to in effect protect those institutions.

I guess I'd ask you to say what about the student or the parent who's considering going to that institution, and shouldn't that student or parent be able to know that this is indeed a vulnerable institution, that there are issues there could affect the education and affect whether or not that institution survives four years.

MS. HATTAN: Yes. I mean you get into what truly is a dilemma. But what we have found and also, I mean, probably the more recent example is

with respect to some of the financial responsibility standards, where a lot of our institutions ended up on a list largely, in many cases, because endowments went down and that went over into a reduction in what their operating funds were.

Those institutions are surviving, and they're fine. It's the issue that the local media in these cases dumped upon that one thing, as opposed to, you know, if there could be a fair portrayal. I mean a lot of these institutions, especially for example some of the religious and faith-based institutions, have very strong roots and resources that maybe don't show up as well, but they continue to survive.

The problem is that when the negative gets accentuated, then you start a process of misunderstanding. So I mean it's bad for students to have bad information about an institution as well. So that's the point of view we put forward.

I think that in terms of the transparency issue, it does come down to what is it that students and parents need and want to know, which I think can

become a difficult question.

A full accreditation report is not necessarily useful to most people in some respects. You know, maybe it would be easier to just put it all out there, because no one would ever sort it out.

So I mean that's the basis for our view, and I know you've, you know, obviously you have followed us for a long time, so you could probably even answer the question better than I.

COMMITTEE MEMBER ROTHKOPF: I guess my only point is that I mean I tend to look at these issues from the standpoint of the consumer, and there's probably no other product that is able to hide the ball as well as colleges and universities, because they don't put out as much data.

The data that's on the web is often promotional, as opposed to hard data, and your organization, the voluntary system, is putting out much more data than was otherwise available, and I would commend you for that.

I would just urge that NAICU and the other groups look at that kind of system, that goes beyond

what you now have, which is basically pretty minimal for a prospective student and a parent to decide whether that's an appropriate place, and what the financial condition may be and some of the outcome data that is even minimally permitted. So anyway, that's my observation. Thank you.

CHAIRMAN STAPLES: Susan.

COMMITTEE MEMBER PHILLIPS: I have a test question for you, for each of you to answer one or both parts of this question. What would make, in your view, accreditation more relevant and useful to internal constituencies, or/and known and useful to external constituencies, from each of your perspectives if you would choose to answer.

MR. MILLER: Alphabetical order, by height? I was trying to suggest during my comment the exact same question.

I mean I think one, it's relevant both to internal and external is more commonality of terminology, so that what one organization says isn't totally different than what another organization says, and we're not all playing this game of lies,

damn lies and statistics, because where you have all these different definitions of various numbers.

So I think it's important we get all of our definitions straight, and particularly our quantitative definitions of what is a student, what is a graduation, so that we know we're talking about at least apples and oranges, rather than apples and hippopotami, which seems to be often because we have such different terminology and such different numbers.

Secondly, I would say more transparency. I know Ms. Hattan was trying to deal with Dr. Rothkopf's very difficult question, but I come down very firmly on the side of transparency, and I base that on a few things.

One is polls that I've seen published that show that Americans' support for higher education is not nearly what it has been historically, and I think at least part of that has to do with this sense that it is a little too mysterious, and that people don't quite see how relevant it is.

When I made the whimsical decision to be a

candidate for statewide office several years ago and ran around the Commonwealth of Virginia for about ten months, there were a lot of commentary about what is the higher education system value. So it isn't just being asked here in halls of Washington or think tanks here in Washington; it's being asked in rural Virginia and the suburbs of Northern Virginia.

So I think people want to know about it, and I think part of the reason people are less supportive, the polling shows people are less supportive of it, is because it is mysterious. I think that in turn has negative implications for higher education in terms like funding.

When state budgets are being cut, what is one of the first things that gets cut? Higher education. So I think that our lack of transparency is not good for higher education generally, so that for the external audiences, as well as the internal audiences, I would emphasize transparency, understanding, as Ms. Hattan said, there are some risks. There are some concerns about that people can distort the information when it's put out there.

But I think generally, if a school does have some challenges that are being identified by accreditation, and if it's a good institution, it will have a way of explaining to the external audiences how it's going to fix the problems, rather than pretending the problems don't exist.

MR. RHOADES: I would suggest that if you have, for the external part of it, if you have essentially a pass/fail system, it's a little bit like pass/fail grades. If everybody passes, you know, in relative terms, you're not really communicating anything to the external world.

I know that transparency is the buzzword of the decade apparently, but I think what's really important is meaningful information. You could be transparent by simply putting everything up financially and otherwise about an institution. It would not be of any use at all to the students, to their families, to governmental bodies overseeing the organization.

So I think it's really important to identify markers for students, for states, for sort

of society generally, to understand what each of these attributions means, about whether an institution is accredited or not, are they improving or do they need to improve and the like.

So I think transparency is an easy thing to invoke. What's much more difficult is to construct a system that people understand and can make sense of. So, as an example, I would say that what Texas A&M is doing, trying to make transparent how much a professor costs and what the student is paying for, is a total distortion of the finances of Texas A&M.

It isn't serving students well at all. It's not serving Texas, and it's not serving Texas A&M well. So I think there's that need to make it meaningful information. Internally as I said, accreditation right now ideally is lots of people who are engaged in the life of the institution are engaged in the accreditation process.

Student affairs professionals who work with students, faculty members who work with students, a variety -- academic administrators and

the like. I think too often we have to confess that that does not happen, and I think there is a lot of room for improvement for greater engagement of a variety of constituencies on campus. I'm speaking for faculty as the general secretary of the AUP, but I think other constituencies as well.

The problem is there's a cost to that, and the cost is people's time, and the cost is people's sense of well, I'm committing this time; what impact does it really have? When you're in a system, again, that is basically totally pass/fail, what is the incentive for any constituency on campus to spend a lot of time on this?

They know that there's a very, very, very, very low probability that their institution is not going to get reaccredited. So I think that's a connection between having meaningful markers to the external world, and having people engaged internally in the processes.

DR. HOWARD: I think transparency internally and externally are critical. So I went back and looked at my institution's website and our

full report is still up there from 2008, our accreditation report. Because I think that people inside of the institutions are the ones that are really going to make the changes to help students to be successful.

So internal transparency, sharing of information, sharing of data and feedback, I think, is important. But we also should let others know what we're doing. My institution, when I was president, was a member of the VSA and certainly APLU and AACSB have partnered on that initiative.

There was some data that we had to put out there, that may not have been as favorable as I would have liked for it to be. But that data helped me with parents and families, because they said I was honest, and they knew what they were getting into in terms of what experiences their children were going to have.

So it doesn't always mean because we have unfavorable data that it's always going to work against us. So I think these are public dollars in many cases, certainly in my sector that we're

expending, and so I think it should be open.

Graduation rates, a common language again, as you just heard, is critical. Institutions spend a lot of resources supporting students who are not first-time students. Because of the mobility of students, it's going to continue.

We really need to step back and re-look at that, because we're really missing a lot of the work, and important work that institutions are doing and that we're paying for and expending, by leaving some of our students invisible to the nation and to our institutions and to the public that we serve.

In terms of what else would help, I mean I'd be interested in exploring a system of tiered accreditation where, you know, you have some institutions who are well-established, who are going to continue to be successful.

More accrediting feedback may help them to get better, but those institutions, learning what their best practices are, getting those best practices out there and shared, and instead of having, you know, just a pass/fail system, to try and

introduce some sort of a tiered system, I think, would be useful as we move forward to try and think about accreditation for the future.

MS. HATTAN: Yes. I interpreted the question a little broader than just the transparency, and I think my answer to it is the same, is that I think both internally and externally, the one thing that I hope the Committee will keep in mind is that it thinks through what the federal role or what reauthorization changes might be, is that there's usually a tendency, in looking towards federal legislation, of a piling on, as opposed to a review of what's already there and whether it's needed or not.

I think that there's been quite an accumulation of expectations upon accreditors and certainly, as I've sat through the various NACIQI meetings since I've joined the NAICU staff and also participated in the regulatory process, I've seen that growth.

This is certainly not just accreditation; it's just a tendency everywhere. It's so much easier

to add some things rather than to pull back. I think there have been some very intriguing ideas put forward about how you recalibrate, if you will, the balance between the traditional private functions of accreditation, versus the role that they've been asked to assume as federal gatekeepers.

This is tough work, you know. Our organization started to think about it, because you know, the accumulation is starting to wear. I listen to an increasing list of things that accreditors have to check off as they come before your group, and I realize the pressure's on them.

I mean obviously, we've heard the critiques of the way graduation rates are calculated. Some people think graduation rates may not even be the way to go, because you know, it's encouraging dumbing down to get you through.

I mean so it's -- and alumni satisfaction. There's another way, certainly, you could look. You're also looking probably at expense in tracking down people who don't necessarily feel they have an obligation to you.

Nonetheless, I really would encourage you to take a look at, you know, have we really built something that we want to keep and add other stories to, or do we want to take a few down and look at it differently? So that, I think, would help out internally and externally, in terms of this whole process.

MR. TANNER: In terms of the information that's available, almost all of our members are public institutions, and therefore accreditation reports are part of the public record. But I think that fails to serve the public, inasmuch as it's very hard for a parent, for example, to know what the document is saying. That's like being handed a Supreme Court decision. You have to be a lawyer to know what it might mean.

I think we can do some simplifications of the information that's made available, and I would support, as in the written testimony, something that moves beyond pass/fail to a gradation and a critique coming out of an accreditation report, that there could be tiers that say that an institution is not

living up to the standards.

CHAIRMAN STAPLES: I think Larry next, and then Jamie.

COMMITTEE MEMBER VANDERHOEF: Mr. Miller, you several times referred to pass/fail in your description, and that's a little confusing to me because that's not been my experience. It may seem like that, but in fact if you want to compare it to grades, oftentimes institutions get grades of D, and they're told if you don't get better pretty quickly, you are out. Only in the case of an institution, there's a large fraction of the institutions that are accredited that aren't just out; they're dead, because they are absolutely dependent on being accredited.

So that in turn leads, has always been for me an explanation of why the pass rate is so high. It's get yourself in line, at least according to the criteria of your accreditor, or you're dead. So tell me some more about what you mean by it's simply pass/fail.

CHAIRMAN STAPLES: I think he said Miller,

but he meant someone down that way. It could have been Rhoades.

COMMITTEE MEMBER VANDERHOEF: I meant someone over here. I apologize.

MR. RHOADES: So let me sort of take it to the level of a professor. If I give someone a D and allow them and say you've got the next semester to do additional extra credit work to make it up, and then we can get you up to a C, I'm still going to suggest to you that you've essentially got a pass/no pass system, and very, very few people fail.

I'm not suggesting that there should be hundreds and hundreds of institutions that are not, that don't receive full accreditation. I am suggesting that it is hard to convince people within the institution, since I'm speaking for faculty in many universities if not most universities, that there's any credible threat to whether they're going to be reaccredited, and that other than simply being reaccredited, what meaning does it have to them in terms of what it says to the external world, and how it shapes the internal world that they live in.

So if you want to make it a more meaningful exercise, both for consumers of higher education, and for the people who are producing it, the faculty and the professionals within the institution, then it has to be more meaningful. Right now, for the vast majority of institutions, it is not.

CHAIRMAN STAPLES: Jamie?

MR. MILLER: Is it possible I can make an observation on --

CHAIRMAN STAPLES: Sure.

MR. MILLER: My observation is that while it may be true that very few institutions actually fail, I would agree with the questioner that the accreditors do raise a lot of issues that require changes at the institution in one way or another. Some of them may be minor, some of them may be major.

So while at some level I agree with Dr. Rhoades, that one can argue that currently it is a simple yes/no question, the reality is that the accreditation visits, the accreditations requests, the accreditation oversight does in fact, at least at

the institutions that I'm aware of that are accredited that are in my membership, do take the accreditation process very seriously.

It does involve the faculty as well as the administration, because yes, it may be true that one puts the probability at total failure at not being very high. Nevertheless, the accreditors can force the institution in many ways, based on the findings of the accreditation review, to changes that can be extremely disruptive. They can be disruptive to the academic program, they can be disruptive to the administration, they can be disruptive financially.

So I'm not disagreeing with Dr. Rhoades, that we need some kind of gradation, because in fact I do agree in principle.

But I think this idea that the faculty just sit around oblivious to the fact that this is going on, at least in our institutions, I think that they do take these accreditation, this accreditation review very, very seriously, because again, even though they may feel that they're unlikely to get totally, get their heads chopped off, that there

could be a lot of damage done to the body if the institution is not making the requirements that the accreditors expect.

CHAIRMAN STAPLES: I think I recognized Jamie, and then you, Anne.

COMMITTEE MEMBER STUDLEY: I'd like to ask Mr. Miller initially to help me think about something raised very early on in his own remarks, especially in the prepared remarks on page two, but I'd welcome other people's thoughts.

There are two interlocking themes that are suggested by this. One is the independence of accrediting agencies from the advocacy or the industry, if you will, and I think we'll acknowledge that all the parts of it, in that sense, are the industry, taken together.

On that score, I would be interested in whether you think that the kinds of both formal requirements and practices are effective in creating the kind of separation that you speak about on page two, that led to the pulling apart the two aspects of advocacy for the field and accreditation.

Are the formal requirements adequate, but is that independence really -- how can we be sure that there is sufficient separation, and I'm thinking you raised it, but I can think of lots of other professional fields and others where these issues are important as well?

MR. MILLER: Well certainly at the staff level, there is maybe too little interaction. We're so separate that we rarely even talk or consult.

They do their thing and we do our thing, and other than occasionally asking each other for information, there is no attempt to pretend that we know what we're doing in terms of their role on accreditation, and I don't see them engaging in advocacy.

If anything, as I said, I've encouraged them when I've talked to them, not that they have to listen to me, to be more at least informational/educational, to spend more time educating people on the Hill. But that's up to them to decide.

So at least certainly at the staff level,

the distinction is totally separate and we totally operate in separate spheres. At the member level too, I mean I think that you will find some people who are active at AASCU have at times been active on accrediting bodies and have served both.

I believe Dr. Keiser, at one point you served on an accrediting body, and now you're serving on the AASCU board. But there's a very clear separation. If you want to be an accreditor, you have to not -- you have to give up all your activities, including serving on the board at AASCU, and vice-versa if you want to be active.

So from a volunteer level, there is no overlap. As far as I know, the volunteer boards do not interact. In fact, as far as I know -- I know for certain volunteer boards in my association do not interact with the accreditation leaders. There simply is perceived as a different world.

One of the problems we have in the policy world is that some people on the Hill say well, some policymakers say well why doesn't AASCU do more self-regulation of the sector, or of higher education?

What we have to explain to them is that's not our role. To the extent there is self-regulation by higher education, it is done by the accreditation body.

Yes, we have a code of conduct. We do educate our members a lot on compliance and the importance of compliance. We do try to make sure our members stay aligned, but of course we have no formal role whatsoever.

Whether someone is or is not a member of AASCU has nothing to do, for example, with our Title IV eligibility. It has nothing to do with whether I'm advocating on their behalf, whereas clearly being accredited is an important gateway for them to be Title IV eligible.

COMMITTEE MEMBER STUDLEY: One specific. You made a point just now and say here that a person cannot be both on your board and an accrediting agency commissioner.

But they can participate in all of the other questions, including the peer review and accreditation visits while serving on your board.

That's not a restriction.

MR. MILLER: I'm not sure. You have to ask the accrediting bodies. I don't know if that's a fact or not. I don't know whether the accrediting bodies somehow restrict their accrediting visitors based on their level of activity at AASCU. I don't know the answer to that question.

COMMITTEE MEMBER STUDLEY: I wonder if anyone else wanted to speak to that one? Maybe not. The companion is raised in your first paragraph, on the issue of multiple accreditors.

Many institutions have a choice of which accreditor to work with in going through the accreditation process, and I'm thinking back to what Professor Baum said earlier, multiple accreditation with multiple expectations means a lot to those participants, and perhaps within the sector.

But it's incomprehensible externally, except in those few markets that have very specific requirements, that a certain accreditor allows you to stand for licensure or some other linkage that makes it clear that there is a qualitative difference among

them.

I would be interested in anybody's comments about how the, what lawyers would call forum-shopping, affects the ability of accreditors to be rigorous and do the kinds of very effective standard-setting that we're talking about, when nobody knows what consequences follow from that.

Either how do we address that, or how might we change the system to -- because we're standing in the way of our own incentives to be better accreditors if you can just say "Well that's fine. You can do whatever you want, but I'm going to the one around the block" that's much easier.

Students have that all the time, right? I'm not going to take the section of Biology that has the tough grader, if my objective is to pass as opposed to learn Biology deeply. So whoever wants to tackle that.

MR. MILLER: Well, my understanding is, and again, I'd ask you to talk directly to the accreditors, but my understanding is among the major national accreditors, there actually is a higher bar

and a higher set of expectations if you are trying to move from one major national accreditor to the other, that that sort of sets off a whole bunch of warning bells and signals, why would you want to switch from one major national accreditor to another?

What has gone wrong or what is going wrong, and they're going to probe perhaps more deeply, raising questions about what has led you to believe that this is a better, more appropriate forum for the major purpose for which we exist, which is to assure academic quality? Why do you think this particular accreditor is better than that accreditor?

So at least among the national accreditors, I think this idea that schools blithely move from one to the other is absolute nonsense. In terms of moving from national accreditor to regional accreditor, there's still the prestige thing that's out there, part of it. Let's be candid about it.

There still is a sense that somehow being regionally accredited is better. I don't happen to agree, but some people do. There is the issue of transfer of credits, even though the Justice

Department opined back in the mid-90's, that it is inappropriate for schools to deny transfer of credit based on the source of accreditation of the sending institution, even though that's in CHEA's policy, I believe, and everybody else's policy.

There still is this widespread urban myth that schools that are regionally accredited don't have to accept credits from students that transfer in from nationally accredited institutions.

So I think there is a proclivity for schools to continue to move from national accreditation to regional accreditation, partly because of the prestige factor, partly because they believe that may give their students a higher probability, if they choose, to transfer, to be able to transfer some credits.

I'd also make the point, Ms. Studley, that the process works in reverse too. We have a situation now, for example, where the American Dental Association a few years ago created two distinctions of dental hygienist, Dental Hygienist 1 and Dental Hygienist 2. I'm not quite sure what the difference

is; I guess it's the sharpness of the objects they're allowed to hold in their hand while you're in the room with them or something like that.

There's a certain examination one has to take obviously to qualify, and the Dental Association, which is all tied up with its accreditors and its process, like to pretend they're distinct but I would argue they're not all that distinct, decided that they wanted to have a policy that only programs that are accredited by their accreditor could sit for the exams.

So they run around to various states around the country and tried to get the state legislatures to enact those provisions, which would say only if you attend an institution accredited by our approved accrediting body can your students then sit for our exams, unless they did something else like practice for two years. But of course you can't even practice because you haven't passed the exam. So the students are put in a Catch-22.

So for example, the Commonwealth of Virginia did adopt the recommendation of the American

Dental Association, and did adopt the requirement that you be -- the program in Virginia be accredited by their accreditor, the ADA's accreditor, whereas the Pennsylvania legislature rejected it, and you can be accredited by other accreditors.

So that's sort of a reverse forum-shopping; it's guild-building, building the guild even higher, making it more difficult for programs to open, or if you're going to open, you have to use only one accreditor.

The ADA was not claiming that the other accrediting bodies were inferior; they were just claiming that they knew better, and their lobbyist was very effective in Richmond, and their lobbyists weren't as effective in Harrisburg. So they won in Richmond and they lost in Harrisburg.

I would contend that the dental care in Pennsylvania is no better or worse because the ADA lost there and won in Richmond or vice-versa. But that shows you the forum-shopping can work the other way too.

MR. TANNER: If I could just make the

remark that certainly for land grant universities, to this point shopping for institutional accreditation has not really been an issue.

DR. HOWARD: It's not an issue for us.

MR. TANNER: If you project out on -- if you project out in, you know, an online world at a different point, the one place where you get into ambiguity sometimes is programs that may be accredited under one professional framework or another, and there may be things going on there. But it's not been really an issue in my experience.

DR. HOWARD: Yes. All of our institutions are regionally accredited and have expressed no interest in national. But I do think it's an issue that NACIQI should take a look at.

CHAIRMAN STAPLES: Anne, your question?

COMMITTEE MEMBER NEAL: Dr. Rhoades, you talked about how higher ed's strength rests in its innovation and creativity, which I certainly agree with, and I'd like to hear from you and the other panelists your response to some really considerable concern that the current accreditation regime and

peer review in fact undermine innovation and creativity, that the accreditation models are largely ones that look at traditional brick and mortar-type arrangements, and look askance often at models that may have a standardized curriculum or even adjuncts.

And also the criticism that the peer review teams are often self-referential, cozy teams of faculty and administrators who are more interested in their peers than they are the public. I guess having heard from Dr. Arum, certainly raised some concerns in head that faculty are not pushing students in ways that will help them think critically and write persuasively.

Could you and other members of the panel respond to those critiques of the accreditation system?

DR. RHOADES: Multiple critiques. I don't think Richard's findings are primarily or solely that faculty and academic administrators are not asking a lot of students.

I think what he's suggesting is, and it's what I was suggesting as well, that if you're going

to talk about accreditation in isolation from all the other things that are driving organizations, and the way that they allocate their resources and invest in students' education, then you are as accreditors missing the point.

So that's why I was saying, a body that is concerned with the use of federal monies, that does not pay attention to the accreditation process, are on balance monies going to the basics, to the core academic missions, versus to a variety of ancillary activities, is missing the point.

That's the key about student learning that I think often gets missed, as well as the ways in which students attend. Your larger question about so what are the metrics that we use to accredit, and I guess I would like to suggest that we do know some things that work, and that are valuable for student learning, and we should not lose sight of, in paying attention to student learning outcomes, which we must, that we should not lose sight of some input factors that we know matter, not always for things that are easily measured, but for things that are

very important.

We know from reams of research that interaction between students-other students, students-other professionals, students and faculty, pay off in a whole variety of ways, not only in learning particular content, but in constructing professional networks that enable them to parlay their education into meaningful, gainful employment.

The problem with our measures as they exist now is they tend to be campus-based. They tend to be, you know, did you have like a question in NACIQI? Did you have coffee on campus with your professor? They're not adaptable yet to the model student, who is not spending all their time on campus.

I happen to think, I'm sure you won't be surprised, that we have lost too many of those input measures, without paying attention to yes, it is possible to construct meaningful learning environments in virtual space and in communities.

But it is not credible to simply say those learning environments and that engagement between

students and professionals is not meaningful, and so we're not going to pay attention to it. We're only going to look at these particular things that we can measure, because we know there's so much about higher education that is really unmeasurable, and it is part of what students are purchasing when they buy higher education.

So I actually think that the reduction in accreditation standards for a variety of the sorts of things that you're talking about suggests the problem isn't that we're constrained in these new learning models by accreditation; the problem is accreditation has not figured out how to measure those things equivalent to sort of a traditional, on-campus, Swarthmore education.

I think that's a challenge for all of us, and I think what you folks are doing, this is a message I'm hearing throughout the day. It's a creative tension if you push at the federal level, and the system, which genuinely is interested in and engaged in and wants students to learn, responds, generates some ideas, a little bit what you were

describing about using information.

But it's that next step that is really highly problematic, where at the federal level you think you can define particular proxies or measures or metrics, because that is what stifles what goes on at the local level.

DR. HOWARD: You know, in some ways I agree with Gary. I mean I don't think we can take one slice of research and say that's, you know, shows us what the whole world looks like. On the other hand, you know, we have to be careful to avoid a one-size-fits-all way of thinking as well, to sort of get at this issue.

I just think we're moving into new territory and we're going to have to work on this as it relates to how do we really review and look at student outcomes. You know, in my last classes that I taught, it really, really bothered me that my students did not take notes. I mean I really had difficulty with that.

But you know, when my assessment measures came up, whether there were exams or other

strategies, they knew the work, and I think there is something going on on how students accumulate knowledge and information, and how they deploy it.

I think our traditional methods are not necessarily capturing what those experiences are. We haven't studied it enough, and I don't think we know all of the answers to it. So always we want to educate the next generation the exact same way that we learned, and I think we have to really figure out how we break out of that mold, and understand what's coming forward in terms of how technology really is impacting the way people amass information, analyze it and then redistribute that knowledge.

So we're just in a, you know, this sort of valley that we're going to have to give ourselves some time, and we need investments. You know, I do agree with his presentation in terms that we do need more investment in research to help us understand things that we don't know about teaching and learning.

I agree that things we do know we need to deploy them more systemically and holistically. But

there's also a lot we don't know, and it's changing on us pretty fast.

CHAIRMAN STAPLES: We're just about at the end of our time. Did you want to respond to that question from Anne?

MR. TANNER: Yes, just one response. The only place where I've seen accreditation being battled because of its potentially stifling effects was in professional accreditation, and if you look at the history of computer science, there was a great tension there as to whether or not accreditation should be fought, because it would cause computer science to be frozen at a moment prematurely in time, or whether it had to be embraced because there were providers going out offering computer science degrees, where the students were not getting very good education. So that was in the early 1980's.

CHAIRMAN STAPLES: Thank you very much again for your discussion and for your presentations. I sincerely appreciate the time and energy put into that.