

APPENDIX J – PUBLIC COMMENTERS' ORAL PRESENTATIONS

CHAIRMAN STAPLES: Thank you very much, it was very helpful.

We are now going to proceed. We are not going to take our break right now. We are going to go to the public comments.

Let me call the first public commenter, Joyce Rechtschaffen.

We now have a timer with lights, and so what we will have here is, each speaker has five minutes, but you will see a yellow light after four, and then a red light after five on this box right here, as well as one on your table.

MS. JOYCE RECHTSCHAFFEN: On the table?

CHAIRMAN STAPLES: On the table. So, that gives you the indication that your time is almost up and then that it is up. So, we look forward to hearing from you. Thank you for being here. Go right ahead.

MS. JOYCE RECHTSCHAFFEN: Thank you very much. My name is Joyce Rechtschaffen, and I'm the Director of Government Affairs for Princeton University. I appreciate this opportunity to make a

few comments on behalf of our President Shirley Tilghman, who, as you just noted has submitted written comments.

Let me just say that President Tilghman stands ready to work with all of you and she would be delighted to have further conversations at any time with the members of the Committee.

I want to make two points this morning. The first is to reiterate her hope that as you identify aspects of the current system of accreditation that are in need of reform, you will, as everyone has said, "do no harm" to those institutions that make the United States the world leader in higher education, and make our higher education system among the America's most globally competitive enterprises.

In the face of increasingly intense international competition for students and ideas, this would be exactly the wrong time to do damage to those institutions that are national and international in scope, and that engage in teaching and research at the highest levels of quality. Or,

to do damage to the diversity of educational philosophies and pedagogical approaches that has long been the great strength of the American system of higher education.

What kind of damages do we have in mind?

One is the alarming increase in costs, especially in terms of staff time and bureaucratic reporting requirements associated not only with the decennial reviews, but with increasing required interim reviews. It is becoming common for the cost of a decennial review to exceed \$1 million, and occupy hundreds of hours of staff time. One institution reported a 250 percent increase in cost over the last 10 years. This includes highly regarded colleges and universities who have long been world leaders in teaching and research, and it comes at a time of great economic strain for all institutions. In our experience, most of these costs are associated with paperwork that provide no clear benefit to the institution or their students.

More important is a growing shift in decision making about accreditation from

knowledgeable peers to agency staff: A growing over-emphasis on standardized testing and an under-emphasis on graduation rates and career outcomes, and a growing tendency of staff to impose their views of what an institution's mission should be and how it should achieve it.

In Princeton's last review in 2004, we used the occasion to examine and enhance one of our highest priority educational initiatives, and we found the observation of our peer reviewers exceedingly beneficial. They commended us on our exceptional educational opportunities we were providing, and found clear evidence that we were committed to the goal to continuous improvement.

From our perspective, this is precisely how the periodic review process should work. But we have now been warned by agency staff that in the future, this kind of review would no longer be acceptable to the Accrediting Agency.

My second point is to encourage a thoughtful review of whether geography remains the most useful organizing principle for accreditation,

especially at a time when many of our leading institutions draw their students and faculty from around the country and throughout the world.

Perhaps a sector-specific national system should be developed. And, where appropriate, these more targeted agencies could work with universities and colleges that competitively draw students nationally and internationally to set threshold standards that are significantly more demanding than apply now within the regionally based agencies--such as high graduation rates, excellent placement records, demonstrated alumni satisfaction over time, and outreach to students from diverse backgrounds.

Institutions that meet these threshold standards should be judged to have met the principle purpose of accreditation -- assurance that they meet agreed-upon threshold standards of quality--so that time and dollars they devote to the accreditation process can be focused on the second purpose, to strengthen the institution's pursuit of its mission through measures that are appropriate to particular circumstances.

Developing a more flexible and nuance approach to accreditation is especially critical as the nature of education changes, with more students engaged in independent study, international study, and programs that reach outside the classroom. As such programs continue to expand and evolve, it becomes even more likely that a one-size-fits-all overall approach to accreditation will constrain innovation, creativity, and real improvement, even among institutions with a proven record of excellence in teaching and research.

We strongly support efforts to address issues of genuine concern in American higher education. But we can do irreparable damage if we do not do this in a way -- if we do this in a way that imposes inappropriate, or unnecessary, regulatory requirements on well performing institutions, or it takes an overly bureaucratic, least-common-denominator-approach to accreditation that runs a real risk of diminishing quality and educational achievement -- not enhancing it.

I appreciate the opportunity to speak this

morning and, as I said, President Tilghman stands ready to answer any questions you may have or to meet with you individually at any time.

CHAIRMAN STAPLES: Thank you very much.

Any members of the Committee have any questions?

(NO RESPONSE.)

CHAIRMAN STAPLES: Thank you for being here.

Our next speaker is Ralph Wolff.

MR. RALPH WOLFF: Good morning. I'm Ralph Wolff, I'm President of the Senior College Commission of the Western Association of Schools and Colleges. I figured since I flew all the way from the West Coast, I ought to at least say something, and I appreciate the opportunity to do that.

I thought I might make a few comments, partly in response to what I've heard and partly to some concerns that I'd like to bring before you all in your work.

First, just to clarify, I would reaffirm Peter's statement that accreditation is not well

understood, and I think it is wholly inaccurate to say it's an all-pass system, given the number of follow up sanctions that we get criticized that we sanction too often. So I would just say that the way in which we describe our actions is not well understood, and the way in which we monitor institutions is not well understood even within institutions, let alone by the public.

I also think there has been a failure to acknowledge the enormous change within the accreditation process, and I speak for regional accreditation. There is a highly successful Baldrige Process called AQIP in the North Central region. We, after receiving over \$2 million in grants, moved to a learning center model, three stages, that focuses heavily on educational effectiveness.

SACS has shifted from 430 or 60 must-statements to a very innovative, and I think successful, process. Northwest, you approved last time with a very innovative seven-year model. There is a lot experimental and a lot adaptation going on

within the regional community, which has not been acknowledged. That's not to say that we couldn't do better, and that there are changes that are needed.

One question that I think we all need to raise is: Who is our primary constituency? And, in the past, I think clearly we are institutional accreditors and it has been the institutions. They created us. They pay our dues, and our salaries. As we are looking at, in the WASC Senior College Commission, this question, we are framing it somewhat differently. And I think this is a question that we all need to address and that is: We accredit institutions, but our primarily beneficiary at this point is the student, and how do we make the process of accreditation focus more on the student?

I don't know that we will have the capacity to improve Stanford's research prowess, but we can at least engage in a conversation with Stanford about the quality of its educational process. That is certainly what we have done.

I would also say that I think that we do need to understand, identify and embrace a public

accountability role, and that minimum standards, or saying that we meet minimum standards, is not the same thing as public accountability. I think we need to be more clear about those things that the accrediting process is accountable for and to whom should that accountability be directed.

That leads to our own journey at WASC Senior. We are in a process of exploring how to redesign our 10-year-old learning centered process. We have commissioned six papers on the future of regional accreditation, which I would be happy to share with you. Peter wrote one on "The New Ecology for Learning." We wrote one -- Kevin Carey, wrote one on how to restructure accreditation. Art Levine, another. Community college presidents wrote on how the four- and two-year commissions ought to work together. We had somebody from Scotland write about how accreditation could assume a stronger public advocacy and leadership role. They have lead to my Commission thinking that -- or not "thinking," determining, that we need to redesign our process to focus on three key areas and we are just at the front

end of this, on completion, on defining learning, and transparency.

Now one of the challenges that we face is the regulatory process of going through NACIQI, because we will be right in the middle of this process at the time that we come before NACIQI. I've talked with Kay about it.

But one of the things that I think you all need to look at is: If you do want us to change, how will your process enable us to do so? Because I have already been advised--this is the law; this is nothing personal--that we are required to conduct comprehensive reviews of institutions in which every standard is looked at, and we want to focus on these key areas.

So we are going to need to negotiate. But I'm saying it's not asking for a deal, it's to say, you need to look at how this process will allow experimentation in a responsible way.

I also want to say that--

CHAIRMAN STAPLES: I'm sorry, we are at the five minutes. That's what that flashing red

light means here --

Do you have any final comments you want to make before we have questions?

MR. WOLFF: I do.

Let me just say, simply 602.16 is the Student Outcome, Student Academic Achievement regulatory provision. There are rules of construction now that say accreditors get to set standards on learning and institutions get to set standards about how to meet those standards about learning. I think the issue is not about standards, it is about, how do we know what is good enough? How do we work with institutions? And there is no single metric. Part of the experimentation that I think we and all of us need to enter into is how to work collaboratively with institutions. Not have the tyranny of a single metric, but whether it's rubrics like the AEC and New Values Project, whether there are some tests, but that is a conversation I would hope that we would be able to have with you, with our institutions, of what are appropriate metrics were we to move more fully into these public accountability

areas.

CHAIRMAN STAPLES: Thank you. Any questions?

COMMITTEE MEMBER STUDLEY: Yes.

CHAIRMAN STAPLES: I'm sorry, Jamiene.

COMMITTEE MEMBER STUDLEY: Some of the suggestions, and they were summarized this morning, included that accreditors be relieved of some of the responsibilities that have been added, or some would say, piled on. Are there any parts of what you are asked to do that you would relish somebody else, specifically, the Feds taking back? I'm thinking of the financial reviews, or any other part of the load, can you imagine them being separated or shifted?

MR. WOLFF: I think one of the things that we need to explore -- I can't -- I will let you know after we understand how to implement the credit hour regulation to know whether that could be one.

Just in speaking in response to not only what we just heard from Princeton, but what others have said, we need to find ways to take things off the table and have the Department respect that. So,

are there off-site reviews, are there data reviews, are there ways in which a visit is not necessary that we can save costs and relieve the process?

Barbara Brittingham, I believe, or Belle talked yesterday about when we come before it, it's all regulations all the time. We need to avoid that with institutions. All of our standards all of the time, if the institution has a long track record of high performance. So, I do think we need adaptive models.

I'm not -- I do believe we do a financial -- we do a good job with financial integrity. We've discredited institutions. We have reported issues of fraud and abuse to the Department. There may need to be better communication when there are problems. I think we've learned a tremendous amount about for-profit institutions and have changed our approaches quite dramatically in the last 18 months, all of us.

So I'm not sure there are specific roles as much as the need to be able to adapt those roles appropriately to different kinds of institutions.

CHAIRMAN STAPLES; Anne.

COMMITTEE MEMBER NEAL: Thank you. It's good to see you, as always.

Following up on Princeton, which was concerned, as I heard it, about the over reach of accreditors in some instances in the planning and judgment of the institutions. I also noticed in the testimony that was submitted by a former trustee of the University of Hawaii, a concern there that the accreditors were very much supplanting or attempting to second guess the governing bodies in their ongoing visits. She raises the question of regents were being quizzed at length on governance procedures, and then lectured to at length about how we should govern.

Then she goes on to talk about WASC and the University of California, and how the University of California's Academic Council in objecting to the culture of interaction at UC, the complaint that the Board caused harsh treatment of administrators, faculty and staff, prompted the Board of Trustees to spend considerable time responding to and correcting WASC's allegations.

So she raises a concern that rather than focusing on the educational quality, that sometimes she has found that the accreditators are overreaching into governance areas which are already held by those trustees. And I would just be interested in your response.

MR. WOLFF: First, I have not seen any -- I have not seen her comments, or his comments. I believe you said it was a trustee or regent of the University of Hawaii, I'm not sure of, but first-- Secondly, this was also an issue raised in our last recognition. And I addressed it there.

Governance is one of our standards. We have a standard that it is the expectation that the governing board and the senior leadership exercise strong performance in leadership. There have been cases where we have found that not to be the case, where boards have failed to exercise appropriate oversight, and when that has occurred, we have called that into question. That is not an area in federal regulation, but it is an area that we believe is indispensable to quality. In fact, we have found

that almost in every case in which we have found an institution in difficulty, that there have been serious governance and leadership issues, and that the board -- and most frequently in those cases -- needed to take greater oversight responsibility or a different kind of oversight responsibility.

So I would stand by the action of our teams and our Commission in those cases. In both cases, the issues have been resolved and we think that we've had follow-up reviews that commended both boards for the steps that they've taken, and so I don't know that those issues are current. They're quite--with the University Hawaii, they are some years ago. With the University of California, probably about four years ago.

CHAIRMAN STAPLES: Arthur.

COMMITTEE MEMBER ROTHKOPF: Two questions, if I might.

First, you referred briefly to one of your goals as you move forward in your move to more innovation, the issue of transparency. And I would be interested in what you would consider under that

rubric, because I think there are those who think that is a good idea, and others who are concerned about it because of the effect on "vulnerable institutions". That was one.

And the second, question I meant to ask yesterday of the -- of your colleagues from the C-RAC, and that is: What would your view be of a requirement of more public membership on your commission?

MR. WOLFF: With respect--let me say, I think there are three dimensions of transparency that we're addressing. We have a task force meeting in March on this, so I'm not ready to say what we'll end up with.

The first dimension is public reporting by institutions, and I think that's probably the strongest leg that we need to stand on. We already have what we call a criterion for review that requires that institutions make public information on retention, graduation and student learning outcomes. And we say "in a manner determined by the institution."

We are looking at whether we want to strengthen that and to give guidance. And we've issued a resource guide those institutions, for institutional representatives, I think an excellent resource guide, on how to do that. What are good ways to do that? What kind of information? What would make sense? Publically available free of charge.

Whether we want to go beyond that and to say how many clicks on a website should it be? I've been going visiting websites and say, "where can you find retention and graduation data?" Our own and others, and with some institutions it's more readily known and in some institutions you have to have a private investigator's license. So, that's one issue.

The second issue is: What information would we make public? Public disclosure of the accrediting process. Whether or not we make our action letters, which sometimes can be very detailed, or the team reports, is a different issue from a report card or an executive summary that may be more

useful to third-parties.

So, we are exploring the issue of what that might be. What the timeframe might be for that. Whether it would be a-- for example, has done this where they have a red light, yellow light, green light, in certain key areas. One of the things that the Commission has discussed is whether following an accrediting review, that would be something.

We have a rubric on educational effectiveness. Whether we would make that public, the team evaluation of where the institution is on our many standards on educational effectiveness. There are real issues about institutional comment on it, on what it means, how it would be understood. This is clearly a learning journey.

The third issue is what I would say is an aggregation role. There are serious issues. When I've read the press accounts, or the executive summary, of Academically Adrift--I also have bought the book. But I read the executive summary that is several pages long on their website. The data on their own are very concerning. They would raise a

lot of concerns. And the question is, when we look at all of our team reports worth exploring, do we want to issue some commentary on what are some key issues that we are seeing when we evaluate institutions? What are some key issues about student success, learning? Partly that is to improve the performance of our institutions and partly it is to improve the communication with the public.

We are looking at all three of those areas, and the Commission is very committed to improving transparency, but we want to do it collaboratively with institutions and explore how that might be done to promote good practice, but not to do harm.

COMMITTEE MEMBER ROTHKOPF: I thank you Ralph.

The other question was on board public members of your commission.

MR. WOLFF: The current law not only defines one to seven, but it defines who may be a public member, which cannot be a trustee, a current,

sitting trustee of an institution.

What I would say is that public members in our experience have contributed mightily. One of the challenges that they face is in dealing with issues of what is good enough. I mean, the interstitial elements of what makes for good practice, I would say the public voice is absolutely indispensable. And whether it is increased, I would hope that it would not be as much legislated as we talk about what is the kind of public voice that is really appropriate to have in our commissions to add to the mix.

In the same way I feel, and Belle made this comment yesterday, one option is a sector-specific approach, but having people from different institutions -- from a Cal State campus, or an adult-centered institution -- work at a unit to evaluate a univer-- to sit in and look at a report on the University of California campus or a Parmona College, and vice versa is really helpful.

So, it's one approach, and I think the one we have adds some value.

CHAIRMAN STAPLES: Thank you very much

Ralph, we appreciate your testimony.

Karen Moynahan is next.

MS. MOYNAHAN: Good morning. My name is Karen Moynahan. I am the Associate Director of the National Association of Schools of Music, The National Association of Schools of Art and Design, The National Association of Schools of Theatre, and the National Association of Schools of Dance--the fine and performing arts, if you will. I've had the opportunity and the good fortune to serve these organizations since 1981. Thank you for taking the time to ask these questions, and thank you for listening today and yesterday.

I would like to speak to four issues, if I may. One is a follow up of yesterday and three ideas, if you will.

First, I don't think the fox is guarding the hen house. Rather, the experts, knowledgeable of their fields are continuing to add brick and mortar to the foundational legacies in their respective fields. Using a robust sample size of over 21,000 commission actions during my time in accreditation, I

have yet to encounter a single individual that feathered the nest of his/her own discipline. In reality, I have witnessed true passion for the arts, great concern for its success, great responsibility to ensure that success, and expected and demanded rigor to ensure that students, the public and civilization are served by its mere presence.

Second, I'm not sure that I think education is a commodity. I don't think it's a product to be consumed. It seems to me that it's an experience. It's an event to be experienced. Many are needed to create the boundaries of the experiences so that the willing participants can take advantage of the event. The participants must share in the responsibility if success is to be ensured. Yesterday we touched upon the responsibilities of institutions of accreditors of the government, all very important to consider. But we didn't speak much of the responsibilities of students. We didn't because if education is understood to be a product, then it is merely to be consumed and I'm not sure this is the purpose.

In this equation, students have responsibilities as well. Demands must be placed upon students. Expectations must be clearly spelled out. Students must come to class. They must engage. They must study. The finest educational system in the world will falter if those involved in its activities are not engaged and expectations are not defined.

Third, these are difficult issues. In discussing them, many aspects, many perspectives, are added to the mix and rightly so. However, at times there are so many, it's possible to forget the heart of the issue. In our deliberations, and our actions, it is important to always remember and stay true to that which is at the center, students and student learning. So often in our offices we talk with callers who, confused in telling them long stories, are unable to find a solution or solutions until you ask them the issue of most importance. When the focus remains on and when, after straying, returns to students and student learning, clear answers tend to appear. It is my hope that discussions will always

center on the heart of the issue, for in these students we entrust the future of our nation.

And lastly, guide us in your wisdom, centered in the law, good law, but in doing so please avoid the tendency seen in the past to extend the conversation beyond the law, and to layer the law with stifling regulation. The beauty of the system lies in its balance. If it becomes unbalanced or prescriptive, the freedoms that rest at the heart of its success and innovations will be bound. Such an occurrence would surely prevent it from obtaining our goals and our aspirations.

Thank you.

CHAIRMAN STAPLES: Thank you. Any questions?

MS. MOYNNAHAN: Thank you.

CHAIRMAN STAPLES: Thank you.

Bernard Fryshman?

MR. FRYSHMAN: Hi.

CHAIRMAN STAPLES: Good morning.

MR. FRYSHMAN: Good morning. My name is Bernard Fryshman. I have been head of a nationally

recognized accrediting body since 1973, and I've been teaching physics at the college level since 1962, and I find it a little bit, sometimes divorcing one from the other, so the perspective I'm going to give you is going to be both.

And I'm afraid that, having listened to all the talks and all of the things taking place, I'm going to be a little bit negative today. I hope you will understand that five minutes is not much time to cover the scope of a whole day's work.

I am very troubled by what has taken place and what seems to be on the horizon with respect to the measurements of the numerical data. Thirty years ago, we were promised and then bullied into, changing the very nature of accreditation. Accreditation used to be a very personal thing: Accreditors went and spoke to students, spoke to faculty, went into classes -- some of that continues -- but the focus, the main focus, now is on numbers -- measuring things.

For decades, literally decades, states and faculty -- states and universities measured almost

anything that had a number attached to it. And there states with trillions and trillions of data items, data elements, data facts, just warehoused doing nothing, producing absolutely no policy initiatives, no insights, no improvements, nothing for scholarship, nothing for learning, nothing for teaching, just a waste. This wasteful activity continues even today among my colleagues, among people who are at other schools -- people tear their hair out over the requirements they have to do, the data that just has no relevance, has never been validated, and never has shown any results.

Today, in fact, we heard Peter Ewell say that with respect to student learning outcomes, quote/unquote, "we're not there yet." Well, that's what some of us have been saying for decades -- we're not there yet. Now the question is: Where do we get back the vast time and effort, money, student lives lost as the whole focus of academia was shifted away from the essentials of what a higher education is all about to gathering numbers?

This was an exercise that should have

taken place on a small scale, a pilot project, scientific standards, rather than imposed on the nation as a whole.

We had the experience of coming before NACIQI and we were told, "Well, we know what you do. We see your assessment, and you got to have some numerical outcomes as well." So we do the numerical outcome business. It's a waste of time, no results, totally useless, but we do it because the Department of Education told us to do it.

I could go on and on. We aren't able to do our job. Sometimes accreditors are not able to make the good conclusions because they don't see what is really happening. They see numbers. Numbers divert. Numbers paper over realities. Numbers enable bad schools -- really bad schools -- to hide the fact that they are not doing their job because they can submit numbers. Numbers can be gamed. Numbers can be manipulated. Numbers don't mean very much, except to other people who know about numbers. Sometimes accreditation becomes a fourth-level process. The institutional research people gather

numbers, they manipulate them into a picture, and they are sent to other institutional research people who evaluate this and then provide an answer to the accreditor who then turns around and makes it a conclusion based on irrelevant data that really has nothing to do with the realities.

Right now we are being told to consider -- we're being told that there's a major foundation that's engaged in supporting the Degree Qualification Profile. Well there's nothing wrong with experimentation. Ralph has described experiments. We've tried some experiments, as small as we are. But they have to be experiments. They have to be done on a small scale. They have to be examined, the way any kind of scientific activity is done. But when you have a major foundation funding something which seemingly applies to Europe with its ministerial approach to education, applying that to American higher education can have devastating consequences. And, again, nothing has been validated. Nothing has been proved to be relevant, and certainly not reliable.

I'm sorry that my only opportunity to talk here is with this negative tone, but I did want to put it on your agenda. You must look into a complete reorientation, a restructuring of the government's imposition of numerical student learning outcomes, and other proxies for education onto accreditors.

Thank you very much.

CHAIRMAN STAPLES: Thank you. Any questions?

Yes, Anne.

COMMITTEE MEMBER NEAL: You and I are always debating on whether or not we are on the same side, and I really think that we are, and I think the accreditors can actually solve your problem. I think the focus on metrics is because if you look at what accreditors now request, for the most part, there is no expectation of a coherent core. There is no expectation of writing proficiency. There is no expectation or framework of learning being set forth by the criteria of the accreditors.

Instead, we have these broad standards which are often utterly meaningless, and which have

produced, I would submit, the kinds of problems that we are seeing in the Arum Report, The National Assessment of Adult Literacy, The Business Roundtable's effort to try to reach out to students.

So, I actually think that you are absolutely right. That if we had a framework of real expectations of what students should learn and know, and match with metrics, that we would have a much better system than we do know. But currently, we have very vague and meaningless standards which allow the problems that you are talking about.

MR. FRYSHMAN: There are two items that I would add, Anne.

Number one, who decides precisely what the curriculum should be? Every agency, every set of experts, every field knows what the curriculum should be. It's not for government and not for anyone else to impose. Curriculum dictates onto a faculty.

The other one is that the results that have happened are, at least the Arum Report, in my opinion, is based on the CLA. And the last time I heard about the CLA there were schools which were

paying students money to take the test. That was reported at a federal meeting, and as far as I'm concerned I'm a little bit suspicious -- I'm concerned that the conclusions that were drawn are not particularly relevant to higher education.

I do agree with you that what is happening now in accreditation when we've got to measure things that are simply numbers, just for the sake of having numbers, is simply irrelevant. This is not to say that there are accreditors, they are not accreditors who find good value in numbers, and I stand up and I admire them. But those of us that want to go back to the old style of accreditation, look at accreditations as a very personal collegial process with judgment being made by experts, that's certainly where I think we should be going.

I would add something else. There are really two kinds of higher education. There is one with an occupational aspect, and one with a scholarship aspect. And setting standards for both simultaneously, sometimes just doesn't fit. So what might be very useful in measuring the ability of

people to become nurses, or doctors, or lawyers, or anyone whose ultimate goal is that of a specific occupation, numbers might make sense. For those of us that are trying to create the transformation in the student, and enhance critical thinking, develop people who have an interest in the life of learning, those measurements simply don't make any sense.

CHAIRMAN STAPLES: Thank you very much for your testimony.

Sally, Sally Tom is next.

MS. LEWIS: I'll see that the document is posted on the member's website. Thank you.

MS. TOM: Good morning. Thank you for the opportunity to provide comments for consideration in the upcoming reauthorization of the Higher Education Opportunity Act. I'm Sally Tom and today I'm representing the Accreditation Commission for Midwifery Education, known as ACME. I am a Certified Nurse Midwife, and I'm on the faculty of the Frontier School of Midwifery and Family Nursing, which is a graduate nursing school that prepares people to become certified nurse midwives, and family nurse

practitioners. It is also the oldest of the online distance education programs in higher education and nursing.

We, at ACME, accredit programs that prepare to become certified nurse midwives and certified midwives, and we now have 39 accredited, or pre-accredited programs. ACME would like to offer you two ideas.

First, we currently have midwifery education affiliated with schools of nursing, allied health, medicine, and public health. We have programs located in states, in the District of Columbia, and the Commonwealth of Puerto Rico. To encompass and encourage this diversity of institutions and jurisdictions, we have aimed to write high standards into our criteria while aiming to avoid prescribing mechanisms for implementing those standards. For example, we require that programs demonstrate that they meet the relevant national professional educational standards, the standards required of the various types of schools in which our programs reside, and the standards of the

legal jurisdictions in which they are located.

We encourage NACIQI to similarly craft wording that simultaneously upholds the highest standards of education, while being broad enough to embrace the variation in programming needed to meet differing professional and jurisdictional standards.

Second, as noted yesterday, many programs deliver content by combining asynchronous distance educational methodologies with synchronous face-to-face methodologies. In writing our criteria, we have chosen not to write different standards for distance education and brick and mortar classroom education. We have yet to hear of a standard for distance education that could not, or should not, be applied to classroom education. And we have also yet to hear of a standard for the classroom that could not, or should not, be applied to online or other distance methodologies.

We encourage NACIQI to consider whether a quality standard that starts out being thought of for one methodology is not also equally applicable to other methodologies. We have found that regardless

of whether the program delivers content in person or via pixels, what is good for the goose is good for the gander. And I must add, in response to Mr. Fryshman, that in nursing and in the other healthcare professions, we aspire to create people who are scholars, who are critical thinkers, and who also aspire to a life of continued learning and contribution. I don't see the distinction between scholars and occupations that he made, and I doubt that my colleagues in healthcare would see that distinction as well.

Thank you and thank you for the opportunity to speak to you today.

CHAIRMAN STAPLES: Thank you very much.

Any questions?

Thank you for --Oh, sorry. Jamiene?

Yes.

COMMITTEE MEMBER STUDLEY: When you put it that way, the comment about having the same standards for asynchronous and classroom and other kinds of delivery, seems virtually inarguable. But was that a hard one to come to? And did it require a lot of

discussions in the field and as you developed it? Or once you had that insight, did it fall out pretty neatly?

MS. TOM: It's been an evolution. When the distance programs first came along we would often stop and think, "Oh well, that exists now, and we'd better write something special for that." But once we had crafted that special thing, then we thought, "well, shouldn't it apply the other way as well?" What particularly brought it to mind was the requirement that online programs must verify that the students taking tests and submitting work are in fact the students who are enrolled.

The same kinds of issues of potential cheating come up in the classroom education as well. So, we didn't see a reason to make any distinctions between the two settings.

COMMITTEE MEMBER STUDLEY: Thank you.

CHAIRMAN STAPLES: Any further comments?

(NO RESPONSE.)

CHAIRMAN STAPLES: Thank you very much.

MS. TOM: Thank you.

CHAIRMAN STAPLES: Anthony Bieoa, please?

MR. BIEOA: Good morning. I'm Anthony Bieoa, I'm Director of External Affairs for the Accrediting Council for Independent Colleges and Schools, ACICS. And I appreciate the opportunity to address you briefly this morning, and to reiterate some of the elements of our written testimony, which was submitted by Dr. Al Gray, our CEO and Executive Director, who could not be here this morning.

The work of this panel, of course, is coming at a critical juncture for our system of higher education and the commissioners at ACICS and our executive leadership are fully aware of the tremendous challenges involved in reviewing and making recommendations about the future of our system of voluntary peer accreditation.

This morning I would just like to talk to you a little about ACICS' role, historically, some of the external forces that have brought us here today, and why ACICS can continued to be a resource for an educational, regulatory and quality assurance community, that must address these challenges

together.

ACICS, was founded in 1912 as a voluntary quality assurance provider for an Association of Business Schools. We have since grown to become the largest accreditor of private post-secondary institutions offering degree programs in the United States. We are currently one of only two national accreditors that are recognized both by the Department and CHEA -- Council on Higher Education Accreditation.

Now during the last 99 years, the structure, techniques, and the name of ACICS have changed and evolved in response to the changing nature of applied career-based education. In short, ACICS has adapted. All of this has been in response to shifts in economic, social, and political realities, and in response to changes in the way post-secondary education is provided in the U.S. Some of these shifts have been minor, some of them have been major -- and we are in the midst of one of those major shifts today.

Access to economic prosperity through

employment in heavy industries, or manufacturing, as you know, has all but vanished, leaving high school graduates with fewer viable options for translating their high school credentials into opportunities to participate in our economy.

In fact, many entry-level careers that once required only a high school diploma, have become professionalized as more and more employers require technical and specialized skills beginning on day one. That's what our institutions have as a primary role.

Two days ago, a front page story in The Washington Post highlighted the skills' mismatch that economists are blaming for persistent unemployment even though jobs are available. This was particularly Fresno, California. The dilemma, the Post wrote, is becoming more common across the country as employers report increasing numbers of jobs openings, but many of those jobs are not a good fit for those who are out of work.

Over the last few decades, the participation by Americans in career colleges has

grown substantially, by as much as 225%, according to the National Council on State Legislatures -- far exceeding the enrollment growth, as you know, of traditional liberal arts and research based higher education.

So, what do we make of all this? The forces that have altered the higher education landscape are largely organic and involuntary. They reflect the changing nature, we submit, of our economy and the changing needs and expectations of the current generation of adult learners. More than 850 institutions accredited by ACICS are at the leading edge of these changes, and we like to assume that we are as well, in terms of a quality assurance provider.

For example, we've developed and are testing a system of evaluation and accreditation that is unique to multi-campus institutions. The reality is that the single campus model is no longer the only appropriate unit of measuring and evaluating educational quality and student services.

Another example, ACICS has deployed

distance learning experts, whose primary job is evaluating the effectiveness and the best practices of online programming at our member institutions. These are but a few of the tools that we've applied to an educational landscape that was reshaped by natural forces. We will continue to apply those same tools on behalf of the student population very different from that of even a decade ago. These are tools that complement our most valuable resources as an accreditor of career colleges and schools. For example, boots on the ground at each of the schools that we accredit in strong numbers with experienced evaluators every three to four years on average.

Also, a deep understanding of the specific type of education being offered at each of our institutions and, more importantly, with our nearly 100 years of existence, the authority and the legacy that enables us to demand appropriate reforms when they are needed on behalf of students.

I think we would all agree that a one-dimensional system of higher education is not practical or desirable for this century or even this

decade. But a multi-dimensional system needs an accreditation structure that is resourceful, knowledgeable and innovative enough to stay ahead of those changes. There is value in seeking solutions that empower accreditors like ACICS to establish appropriate standards for student learning and achievement on an institution by institution basis, and that embraces the positive changes to higher education.

Thank you again, and I welcome the opportunity to answer the questions that you all may have.

CHAIRMAN STAPLES: Thank you very much. I don't see any questions?

All right, thank you for your testimony.

Ronald Blumenthal is next.

Mr. Blumenthal and the next speaker submitted advance requests for testimony. Please proceed.

MR. BLUMENTHAL: Good morning, I'm Ronald Blumenthal, Senior Vice President of Administration at Kaplan Higher Education, the current Chairman of

the Accrediting Commission of Career Schools and Colleges, ACCSC, and a former member of NACIQI.

It gives me great pleasure to present comments today on behalf of Kaplan Higher Education, a subsidiary of the Washington Post Company. Kaplan Higher Education is a company that serves more than 100,000 students, mainly adults juggling work and family obligations who are under-served by traditional institutions. We offer the full range of post-secondary educational programs, from certificates to graduate and professional degrees.

In 2010, more than 43,000 students graduated from these programs. Kaplan Higher Education institutions are accredited by either a national or regional accrediting body recognized by the U.S. Secretary of Education.

As you know, accreditation is critical in providing assurances to students, employers and the government regarding the quality of an institution of higher learning. I would like to make several recommendations concerning how the accreditation process could be improved.

First the Federal government and accrediting bodies should further encourage institutions to: 1) clearly identify the learning outcomes delivered in their college-level educational programs; 2) assess graduate's achievements of those outcomes; and 3) more frequently and publicly document the evidence of student outcomes through a variety of assessment methods.

These methods should demonstrate that the skills and knowledge acquired from education can be applied by students to a variety of contexts. A firm focus on student outcomes, including such indirect measures as graduation and job placement rates, will actually encourage institutions to create distinct ways of promoting student success.

By tracking student outcome data, we also promote organizational learning by institutions. Tracking the learning effectiveness of educational programs at Kaplan Higher Education is a crucial part of what we do. Kaplan Higher Education campuses track graduation and placement rates to very rigorous standards. At Kaplan University, we have the course

level assessment. For a given course, groups of professors create common curricula, alignments, and assessment tools. This permits comparability and accountability driven by a set of explicit learning outcomes based on real world standards. We define what success looks like, and we have a common tool to deliver, measure and improve it.

Second, there is little outcome data that can be compared effectively across all types of institutions, which would allow students, parents and taxpayers, to understand what they are getting in return for their time and money. The primary metric of student success measured by the Federal government is the Cohort Graduation Rate, using IPED's data. However, it is well known that this metric, which tracks only first-time, full-time students, does not reflect the majority of today's learners. We recommend that the Federal government develop metrics through IPEDs that more appropriately track retention, graduation, and other student outcomes.

Moreover, comparable evaluation is meaningless unless an accepted framework of common

standards is present. A shared framework for learning standards is perfectly feasible to obtain without sacrificing institutional autonomy. The European Bologna Process frameworks and standards have the greatest possibility to becoming universal benchmarks for evaluation of higher education, leading to a quality assurance scheme that would permit recognition of college credentials across institutions and borders.

It is reasonable to expect U.S. based standards and outcomes to be compatible with those of the Bologna Process. Common standards could ease the transfer of credits among institutions reducing cost for students, parents and tax payers throughout post-secondary education. Federal government can and should find ways to encourage accrediting agencies and institutions to move in this direction.

Third, like the institutions they accredit, accrediting agencies themselves could benefit from implementing continuous quality improvement practices derived from performing; and more widely sharing the results of internal data

tracking and self-study. These results could be validated by independent nongovernmental third-party review, perhaps undertaken by the Council on Higher Education Accreditation.

Finally, I would like to turn to another institutional quality related provision in the Higher Education Act, the 90-10 requirement. This provision requires proprietary postsecondary institutions to obtain a minimal percentage of their revenues from sources other than student aid. While Congress intended this rule to be a measure of educational quality, the 90-10 provision is a financial metric that performs poorly as a proxy for quality. Further, it has had the unintended effect of putting upward pressure on tuition that must come from non-Title IV sources. Whenever the Federal government increases Title IV grant and loan availability. We believe the 90-10 requirement should be repealed. At a minimum, the Federal government should provide relief from this requirement for colleges that demonstrate educational quality in other ways, or that reduce tuitions.

In closing, I appreciate this opportunity to share our views, and I would be happy respond to any questions.

CHAIRMAN STAPLES: Thank you very much.
Arthur?

COMMITTEE MEMBER ROTHKOPF: Thank you very much for your comments. I guess I'm not sure we have within our purview the 90-10 Rule, I have a feeling that's above our pay grade. But I guess I have to ask the question as a devoted free-market person, why is it that -- I appreciate entrepreneurs going out there and coming up with new methods and new innovative methods, whatever it may be, whether education or otherwise -- but I think you are asking for the Federal government to be funding that activity, funding it more than 90 percent. And why is that consistent with free-market principles?

MR. BLUMENTHAL: I think it's consistent because, when you look at the population of students that we are serving, which are essentially at the lowest end of the social-economic scale, and the poorest students, the 90-10 requirement requires that

there be a gap between the cost of education and the amount of money that is available through Title IV funds. And as the amount of funds, Title IV funds, increase we have to increase tuition in order maintain that gap. Otherwise, we're in violation of 90-10 and we are unable to serve the same numbers of students who require higher education, and that is not available to them in traditional sectors.

COMMITTEE MEMBER ROTHKOPF: I hear it. I would like to think about it. Thank you.

MR. BLUMENTHAL: Okay.

CHAIRMAN STAPLES: Any further questions?

(NO RESPONSE.)

CHAIRMAN STAPLES: Thank you.

MR. BLUMENTHAL: Thank you.

CHAIRMAN STAPLES: Dr. Jallai.

I'm sorry, did you have a comment?

COMMITTEE MEMBER KEISER: Ron?

MR. BLUMENTHAL: Oh, I'm sorry.

COMMITTEE MEMBER KEISER: It's interesting that you bring up the Bologna courts, and the fact that a good part of the world is moving to a

different structure, in terms of the way degrees are designed. And why do you think the United States should move in that direction, versus the rest of the world moving towards our direction?

MR. BLUMENTHAL: Well, it's because the world keeps getting smaller, and it seems to me that we're living in an age when, in a global arena in which it behooves us to be able to function effectively in that milieu. And I think that the fact that we have inconsistent requirements for degrees and that they mean different things, is confusing to a lot of people. It would help clarify things if we moved in a direction that was more consistent.

CHAIRMAN STAPLES: Thank you. Dr. Jallai?

DR. JALLAI: Good morning. My name is Dr. Jallai, I'm from Fort Lauderdale, Florida, which is nice and sunny.

First of all I would like to thank this committee for allowing me to address my comment, which I also put a written comment to this committee in reference of my objection to continual recognizing

American Osteopathic Association for accrediting agency for an osteopathic medical school. And the reason for my objection, as I have stated there in detail with supporting document in my written comment to this committee, is that AOA not only has failed to comply with the terms and conditions of 34 CFR Section 602.31, which states that accrediting agency -- which in this case is AOA -- must complies with the criteria for recognition listed in subpart B. AOA also has violated numerous section of subpart B, which more specifically, Section 602.16 -- 602.22. This failure to comply in violation of 34 CFR Subpart B, by AOA, clearly robbed me out of my tuition money, which I gave from a student loan, which I paid to the university that I have attended. It also robbed me out of a degree that I have earned. Therefore, that's my objection to -- for this entity to become again certified as an agency to recognize institutions.

CHAIRMAN STAPLES: Excuse, me. I just want to make a point and I will let you finish, but this hearing is about the reauthorization of the

Higher Education Act, and I'm not sure your comments are really pertinent to that. I will let you finish your comments, but I just want to acknowledge, or would like to at least mention that that is the focus of this proceeding, and if you have anything pertinent to that issue and the issues that we have raised here, I think that would be more appropriate for your testimony.

DR. JALLAI: Well, I think it's clearly that it has something to with the Higher Education Act, because the certification of accrediting agencies, such as American Osteopathic Association, when they accredit institutional university, it makes those schools eligible for Title IV student loan, which is clearly part of the Higher Education Act program, and because of that accreditations, students like us we go to that university. And then, these accrediting agencies are supposed to be the watch dog, to monitor and implement the rules and regulations that it was based upon them to monitor the university to comply with all those rules. So that way the student can go to university, pay their

tuitious and get their degree and get on with their life. Instead of going over there and allowing the university to kind of basically change the rules without any notification, and without any follow up on it. As I said, the 34 CFR rules is very clear to state that the accrediting agency must monitor, must enforce the accreditation rules and policies, which effect the Title IV Higher Education Act program. Because if they don't do that, then there are a lot of student -- they don't get their degree, they owe money to the government, the default rate goes up, and the student will be left with nothing. And the university cannot take the student money and give them -- not give them what they was promised.

Right now, in my case, I have student loans of hundreds of thousands of dollars, but I don't have a degree for it, because I paid the money to university because AOA failed to monitor university and tell the university, "you can't change the rules without first notifying us," and now they come in front of this agency and say, well, rubber stamp us again so that way we can just stick our head

into the sand and allow university to do whatever they wanted to do. That is not acceptable, because right now I am liable for student loans that I borrowed that, based on the promise that this agency, and based upon approval of this committee and the U.S. Department of Education they will monitor this university to ensure that I will get a fair deal of my education if I do the job right, if I pay my tuition, if finish my classes. And that's clearly has a lot to do with Higher Education Act and Title IV.

So, I mean I don't know how more I can explain it, but, I mean, I think I'm pretty much in the right place, given the fact this agency is coming in for accreditations on June or July to be recertified or restamped again, that as a watch dog. But, yet, they are not doing their job. And because of that now I got U.S. government breathing down my neck, "well pay us the student loans." Well, for what? I don't have any degree because I paid the money and when you tell them, why don't you monitor the accrediting agency to implement those rules that

you asked them to do it when they came for an approval, seems like it falls on a deaf ear.

So, as I said, I believe I'm in the right place, and, you know, I appreciate the opportunity that was given to me, so that way I can go on the record and maybe when this committee will again convene on June or July when American Osteopathic Association comes in for reaccreditations, somebody will ask them if we going to approve you again, if we are going to rubber stamp you again, are you going to do what you what you were supposed to by 34 CFR Section 602.16 all the way to 602.22. These are not my rules, these are United States Department of Education rules--which this committee then reports to.

Thank you.

CHAIRMAN STAPLES: Thank you. And I would just note that probably the better time would be for you to sign up at the time that they come before this NACIQI. So, you may in the right place, but the wrong time. So, I would imagine that you've had your comments and I appreciate them. I'm just saying if

you have specific issues with that agency, when they become before NACIQI, that is an appropriate time for you to raise concerns about that agency. And, I would suggest that you consider that.

DR. JALLAI: I appreciate it. I just follow the protocol that I was given to me and they stated that I would have to put a written comment and then follow up by oral comment if I need to, and that's the time that was given. I asked them if it was something --

I will definitely be there at that time, you can bet your money on that.

(Laughter.)

DR. JALLAI: I just wanted to make sure -
- I have my reservation ahead in advance.

CHAIRMAN STAPLES: Okay.

DR. JALLAI: Thank you so much.

CHAIRMAN STAPLES: Art, did you have a comment?

COMMITTEE MEMBER KEISER: Well, just because he did submit written testimony, we put that on the agenda for when it comes up. We can do that

in advance, can't we?

MS. LEWIS: If I may?

CHAIRMAN STAPLES: Sure, Melissa.

MS. LEWIS: The written testimony is on the member's website, and I also referred it to the Accreditation Division for possible action.

CHAIRMAN STAPLES: Thank you for your testimony.

DR. JALLAI: Thank you, have a nice day.

CHAIRMAN STAPLES: Diane Jones, will be our last testifier. Please come up.

MS. JONES: Hi. Thank you. My name is Diane Jones. I'm the V.P. for External and Regulatory Affairs for Career Education Corporation. I'm also a Board of Trustees member for AALE, formerly a national accreditor and the only body that exists to preserve traditional high quality liberal education in the United States.

But I offer my comments today as an individual and as person who has a great deal of experience with peer review. As this body continues to consider the role of peer review, especially in

the evaluation of quality, I would encourage you to look carefully at the considerable volume of work that has been done by the National Academy of Sciences and other scientific societies, because, from time to time, this same question arises about the role of peer review and the identification of high quality proposals. Going back to the late '70's, the National Academy has looked at this very issue, and I think what they have found time and time again, is that peer review is a lot like democracy. It has its imperfections, but it's the best system we have--with two caveats. And I think these caveats are of importance to this body as you move forward.

Peer review has been found to be a very reliable process for the identification of high quality proposals and thereby high quality academic programs, with the exception of new entrants to the field and innovation. And all of those scientific bodies have recommended to the scientific agencies, including NIH and NSF, that in order to combat these two difficulties that they have a separate set of requirements -- a separate set of provisions, and

even a separate set of programs -- that allow new entrants into the field who cannot and who do not have a track record by virtue of being be a new entrant.

In addition, there are programs specifically focused on those who want to propose innovative ideas. The finding has been over and over again that peer review panels tend to be biased toward that which they know, and that which they have experienced; and there is a certain degree of risk aversion when it comes to evaluating innovative ideas. Again, NSF and NIH have had to come up with a new set of provisions specifically to deal with innovation, understanding that with innovation there is higher risk and there is also higher pay-off.

So, I think that that body of work is important and worthy of your consideration because it may well be that in looking at the role of peer review in the accreditation process, that we do need to identify a new series of rules and a new set of provisions specifically focused on the evaluation of new entrants who cannot have a track record, because

they are new, and those who choose to pursue innovation in higher education--again, understanding that there may be risk associated, but quite substantial pay-off. And, perhaps, a different set of rules would be required to assess and evaluate, and, frankly to assume some level of risk, understanding that sometimes you have to try things that may or may not work well in order to identify those things that are going to have spectacular results.

So, I offer that as my comment, and I thank you for your time.

CHAIRMAN STAPLES: Thank you. Jamiene, did you have a question?

Excuse me, ma'am, we have a question or two.

COMMITTEE MEMBER STUDLEY: I find that analogy very interesting, but I think that there is a piece that precedes it, and maybe you could help us think about it, because this is an interesting outside-the-box analysis.

The question that I come to when I'm

writing that down is that, somebody has to decide what the risk aversion is, just like in any investment process that you make individually or for your endowment or in any other way. And it could be that the current risk tolerance for the investment of Federal student financial aid, which is the core activity, is set to be either relatively traditional, relatively risk averse--you know, a lot of CDs for a defined purpose.

But how would you help us think about where the right place to make that part of the judgment is? Because it could be a very different spot that the government says -- may say some share of what we are investing could be spent quite differently -- whether through federal aid or some other explicit new entrant, or new model, piloted kind of program. Could you take us upstream a little bit as you think about that part of it?

I would appreciate your opening up this new window for us.

MS. JONES: Sure, I mean I think that has always been the question among the scientific

associations, and so I mean if we look at Craig Venter's work, you know, the person who lead the Human Genome Project, he could not get funding from the NIH, because nobody at the NIH was willing to take the risk to invest the money that it would take to sequence the human genome, because what if it didn't work. And look what we have as a result of his willingness to say, "you know what, well, if I can't do it with federal funding, I'll go and do it with private funding," and then as soon as he sought private funding, of course, then the government jumped to action and Francis Collins opened his own center to be a competitor. And so, I think what we saw is a mistake made in history where the Federal government wasn't willing to take that leap, but then quickly realized their mistake and then jumped in to make the investment.

I think we have a similar situation here. We have a great deal of interest spoken by Secretary Duncan, by Secretary Spellings, probably by every Secretary of Education there has ever been. There is a strong interest in finding new ways to solve the

challenges that we have in higher education, and I would say the challenge now is really finding ways to serve nontraditional students as well as those who have been unsuccessful in the K-through-12 system.

And so, I think the focus of our innovation should be on serving that population of students that has not been well-served by the traditional system, and frankly, for whom the current evaluation metrics are irrelevant. And so, I would urge you to think about in the accreditation program, could there be, even for a limited period of time -- say for a three- to five-year trial -- openness to a separate set of rules, a separate set of provisions that will allow a new entrant in. Perhaps, saying that you are going to get provisional accreditation for three years, and then after three years you are going to be evaluated, and after five years you have to conform with the traditional standards. But I think there needs to be a period where a new entrant can come in under a different set of rules, so that they can develop the track record. It's a catch-22, if you are a new entrant, you can't enroll students

because they can't access Title IV, and because they can't access Title IV, and you can't enroll students, you can't develop a track record.

So, as I think the similarity is, you have a limited finite period of time. That's the way the scientific agencies do it. You have a three-year grant with potential renewal for up to five or seven years, however they structure it. But there tends to be an entrance period, and then you are evaluated based on a very different set of metrics than a traditional grant might be evaluated, and then you have an opportunity for continuation, and I think that model has some usefulness in the work you are doing.

COMMITTEE MEMBER STUDLEY: I think that the questions have usefulness, and I think that the area is very interesting. I think that if we decide to explore it any further, some of the questions that would come up naturally are, whether that is an appropriate role for this set of funds and for this process, or whether this -- take the scientific analogy relative to FDA where actual humans are

involved in putting themselves on the line, versus the risk that you would take in imaginative upstream research.

MS. JONES: But with all due respect --

COMMITTEE MEMBER STUDLEY: Because--Could I just finish my comment?

That this may be something that FIPSE or a Race to the Top equivalent, or a foundation initiative might be other ways to achieve those kinds of objectives, or whether that should be within the core Pell and Loan funding, and the accreditation process, would be things, I think, we'd want to think about.

MS. JONES: Well, with all due respect, I do think humans are involved here, and I think I'd like to remind this body that the Title IV programs, frankly, were developed at a time when there was a great deal of interest in specifically serving those students who did not have access to higher education.

Title IV was not created to allow middle-class kids to buy their way into elite institutions. That is what Title IV has become largely, but that

was not the origin of Title IV. And I'm not criticizing that expansion, I will be the first one to admit, I benefited from the Title IV program to allow my middle-class kids to attend elite institutions, so I am not critical of that expansion. But the purpose of Title IV was to allow disenfranchised and underserved students to access the higher education system, and the paradigm was that the student would get the money to make the decision that is best for the student.

Using programs like FIPSE -- and I could spend hours talking about the limitations of FIPSE, primarily being there's no money in FIPSE, and most of the FIPSE dollars are ear-marked. But again, in Title IV, we're not talking about a peer review body allowing an institution to try, yet again, another experiment. We're talking about a student making the choice to engage him or herself in an opportunity that is based on innovation. And so, if a student is making a choice with their entitlement dollars, I don't think that anybody should get in the way of that choice. Although there do need to be parameters,

and what I'm suggesting is that the accreditation system could set up a new set of parameters that still enforce student choice, but inform students about what kinds of choices they're making, and certainly put some boundaries on the field so that innovation has to be incremental. So that it has to be checked on more regularly.

But I do not think FIPSE is the answer for lots and lots of reasons.

COMMITTEE MEMBER STUDLEY: I think your points about thinking about the ultimate mission of the financial aid system are well taken. I didn't mean this as a defensive of the current state of FIPSE, but simply that there are different vehicles for achieving different kinds of change or approval.

MS. JONES: And none of them have ever been effective. If you look at all of the education grant programs at the National Science Foundation, if you look at the review of the FIPSE program, if you look at the review of the Tech Prep Program, every single review of a systemic change grant program, like FIPSE, like, name your program that is focused

on supporting innovative, there have been no results reportable beyond anecdote and beyond the initial investment of money.

I mean, the National Science Foundation has invested billions of dollars in reforming math and science education, and we are not seeing results. I think this is a different model. This is saying that we're not going to have a peer review panel pick their institution of choice to try yet another experiment that never goes to scale; and by the way, the problem with the grant programs is that they never go to scale, they never go beyond three years because once your three years is up, you're no longer innovative, you can't get out on funding.

And so, I think the grant programs have done a lot of work to try to innovate, to try to identify sources of innovation. None of them have ever been able to go to scale. And this is a model that says, we need to have, within the accreditation system, the recognition for the need of innovation, the ability to let students march with their feet, but with some very clear parameters that will allow

us to evaluate innovation more closely and to have students have more information about exactly what it is they are getting into. That perhaps this is an unproven methodology. That perhaps with this methodology, these are the risks that you might incur.

CHAIRMAN STAPLES: Thank you very much, and that concludes this portion of our agenda. We will now take a ten minute break before we begin our next session.