**CYoshitomi - Department of Education Regulatory Negotiations**

**Conference Agenda**

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**Topic 2:   DOE Regulatory Negotiations: Accreditation - Separate and Independent Part A**

The Department also seeks recommendations from negotiators on how it could discourage or prevent accreditors from aligning with state licensing bodies, professional organizations or other vocational credentialing boards to exclude individuals who prepare for work through apprenticeship, the military, or other work-based learning pathways from sitting for licensing exams that they could otherwise pass.

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| 1. | **Christy's headline test** This is test to show how a headline and the detail segment differ when you enter ideas. Please remember to enter "add my idea" below the "detail" box after each idea or thought. |
| 2. | **Possible Solution to exclusion of military members from licensure - Laura** This process is not controlled or, in any cases of which I am aware, even influenced by accreditors. Most regulatory (state) boards will have laws in place that if completion of an accredited program is required for licensure, then options are in place for individuals whose education and qualifications are substantially equivalent to individuals coming out of accredited programs, to advance to licensure. These credential evaluation services should work with states. Can the Department work with States to facilitate this? |
| 3. | **Importance of contact with practitioners/employers for specialized accreditors - Laura** I agree that accreditors should not be "lobbying" or even "aligning" with credentialing bodies (or whatever happened with a letter to DOL??? Please keep in mind that bad behavior by a few can happen no matter what he regs say - deal with those instances specifically rather than collaterally damaging those agencies who have never engaged in the practice). However - it is CRITICAL that specialized and professional accrediting bodies maintain contact with professional organizations and licensing bodies. Accreditors do not lead professional fields - they respond to the needs of the profession by incorporating into their standards requirements for students to demonstrate certain skills or gain certain knowledge to be safe and effective practitioners. Agencies are small with limited staff and resources which are mostly spent (appropriately) on quality assurance. It is not reasonable to expect agencies to independently (without the benefit of a convener) "survey" the vast array of employers over a national geographic area eg, urban, rural, cities, tribes, etc.) and the large variety of possible practice settings. This assessment is done - but it is done with our communities of interest (practitioners and employers). What is the best way to access a wide array of practitioners and employers? At meetings and through networks of a professional association. Preventing lobbying or aligning is reasonable - preventing simple association with or use of networks established by our practice communities is not. Is it possible to prohibit recognized agencies from officially advocating the position of affiliated trade or professional organizations or credentialing bodies? This would allow the Department to address the actual concern rather than implementing regulations which might have the unintended impact of cutting agencies off from employers or practitioners in their fields of practice. |
| 4. | **Comments on 'alignment.'** I haven't a clue why this is here. Surely, you don't expect the specialized accreditors not to talk to those in their specific professions in order to assure their criteria are relevant. |
| 5. | **Comments on 'alignment.'** I haven't a clue why this is here. Surely, you don't expect the specialized accreditors not to talk to those in their specific professions in order to assure their criteria are relevant. |
| 6. | **Including work-based learners** Knowing nothing more about this than the question, I'm wondering whether there might rather be an OPPORTUNITY for accreditors to align with state licensing bodies et al. to INCLUDE such individuals? As post-secondary education becomes more conversant with competency-based education, is there not the possibility of CBE credentials earned by work-based learners to be accorded licensing eligibility equivalent to that of traditional degree recipients  https://tags.fmcs.gov/images/expand1.gif  Comments (1)   1. through the good offices of accreditors overseeing/accrediting CBE activities? |
| 7. | **work-based learning** In reading the context provided by the Department, it seems to me that the issue is broader than alignment between licensing bodies and accreditors. As written now, the question invites defensiveness, and will surely result in opposition. I agree with the previous commenter that the question should be flipped to one of inclusion and opportunity--how can the Department encourage accreditors and institutions to accept a broader range of work-based or prior learning experiences? In the questions to negotiators, the background section mentions that licensing bodies "once honored dual-pathways" to eligibility. What happened? Is there a way to encourage or incentivize dual pathways with entities the Department has authority over--accreditors and institutions--to return to this practice? Can registered apprenticeships or military work experience, for example, be the source of expanded pilots or experiments? I absolutely agree that many pathways should be recognized, and if programs are based on valid assessments and quality outcomes, then what is the issue? We should remain agnostic to the source of learning. -Christi |
| 8. | **Unclear on the conflicts; may be too broad/Gellman-Danley** I agree with Christi. Let's look at this as an opportunity then move from that place to the PARAMETERS to make it safe and without conflict. I think the "sharing a copier" is overboard and prescriptive. |

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