

UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

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PUBLIC HEARING

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TUESDAY,
SEPTEMBER 11, 2018

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The Public Hearing convened in the Xavier University Convocation Center Annex, Room 111, Building 62, New Orleans, Louisiana, at 9:00 a.m., Aaron Washington, Facilitator, presiding.

PRESENT

MICHAEL BRICKMAN, Senior Advisor, Office of the Undersecretary, U.S. Department of Education

AARON WASHINGTON, Office of Postsecondary Education, U.S. Department of Education

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1 P-R-O-C-E-E-D-I-N-G-S

2 9:00 a.m.

3 MR. BRICKMAN: All right. Good
4 morning, everyone. Thank you for being here. My
5 name is Michael Brickman. I am Senior Advisor in
6 the Office of the Undersecretary at the U.S.
7 Department of Education.

8 On behalf of Secretary Betsy DeVos, I
9 am pleased to welcome you to this public hearing.
10 I'm joined at the table by Aaron Washington, who
11 is from the Office of Postsecondary Education at
12 the Department.

13 First, let me say how much we appreciate
14 our hosts at Xavier University for having us here.
15 It is a beautiful campus, and we're really
16 appreciative of the opportunity to join you all
17 here in New Orleans.

18 This is the second of three public
19 hearings that we're convening to gather input
20 regarding regulations that govern programs
21 authorized under Title IV of the Higher Education
22 Act of 1965. Later this week, we will hold a

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1 similar hearing in Wisconsin.

2 Secretary DeVos has challenged us to
3 rethink education. And to us, rethink means
4 everyone questioning everything, to ensure nothing
5 limits students to be prepared for what comes next.

6 In postsecondary education, we have
7 focused largely on breaking down barriers to
8 innovation and reducing regulatory burden, while
9 protecting students and taxpayers from
10 unreasonable risk.

11 To this end, we are seeking input
12 regarding the number of regulatory provisions,
13 including issues related to the recognition of
14 accreditors; distance learning and
15 competency-based education, including the
16 definition of regular and substantive interaction,
17 direct assessment, and prior learning assessment;
18 state authorization; the definition of credit
19 hour; and roles and responsibilities of
20 institutions and accrediting agencies in the
21 teach-out process.

22 More specifically, with respect to

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1 accreditation, the Department is interested in
2 improving the recognition and oversight process to
3 ensure consistent and equal treatment of all
4 agencies.

5 In this work, we wish to recognize the
6 autonomy and independence of agencies, support the
7 need of today's students, and honor the missions
8 of various types of institutions.

9 We would like to hear your thoughts
10 about how to simplify the Department's process for
11 recognition of accrediting agencies and how to
12 emphasize the criteria that focus on educational
13 quality, rather than administrative minutia.

14 We are also interested in revising any
15 accreditation regulations that are ambiguous,
16 repetitious, or unnecessarily burdensome, as well
17 as reducing duplication of oversight
18 responsibilities between the Department of
19 Education, states, and accrediting agencies, and
20 ensuring the Department is more accountable and
21 responsive to those it serves.

22 In addition to the accrediting

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1 regulations, we are exploring some specific
2 regulatory provisions that are not directly part
3 of the accreditation regulations, but that impact
4 the work institutions do and the way that work might
5 be evaluated by accreditors.

6 Those provisions include the
7 development of a single job placement definition
8 and a single methodology for calculating job
9 placement rates; the determination of reasonable
10 program length for clock-hour programs that result
11 in certification or licensure; the elimination of
12 barriers to innovation and competition in
13 postsecondary education or to student completion,
14 graduation, or employment, including barriers
15 created by unnecessary credential inflation or
16 other practices that are unfair to students; the
17 ability for an institution to contract with other
18 entities to provide a percentage of an educational
19 program, including to promote innovation and
20 enable more rapid responses among career and
21 technical programs to employer and workforce
22 needs; and the simplification and clarification of

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1 program requirements to minimize inadvertent
2 grant-to-loan conversions for TEACH Grant
3 recipients.

4 Additionally, in light of the recent
5 Supreme Court ruling in Trinity Lutheran, the
6 Department will review provisions and our
7 regulations related to the eligibility of
8 faith-based entities to participate in Title IV
9 programs and the eligibility of students to obtain
10 certain benefits under those programs.

11 We welcome your perspectives as we work
12 on updating our regulations in each of these areas.
13 We anticipate bringing these issues and any others
14 that might be added, including at the public's
15 suggestion, before a negotiated rulemaking
16 committee that will begin its negotiations in
17 January of 2019.

18 We also plan to create two
19 subcommittees, with one focused on
20 competency-based education and the other focused
21 on the eligibility of faith-based entities to
22 participate in Title IV programs. The

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1 subcommittees would consist of experts in those
2 areas, who would not make decisions, but would
3 report their recommendations back to the full
4 committee for deliberation during public
5 negotiations.

6 In the late fall, we will
7 publish a notice in the Federal Register seeking
8 nominations for negotiators and subcommittee
9 members. We hope that you and your colleagues will
10 consider serving in that capacity at that time.

11 In order to best use the time of the
12 committee, prior to its first meeting we plan to
13 provide draft proposed regulatory language for
14 discussion by the negotiating committee and the
15 subcommittee, rather than the issue papers we have
16 used in the past.

17 This will enable the committee to
18 consider concrete proposals before the
19 negotiations and to begin more of its essential
20 work during the first session.

21 With respect to the logistics for
22 today, many of you have already signed up for times

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1 to speak, and Aaron will call you up to the
2 microphone accordingly.

3 We still have some time slots available
4 for today, so if you have not signed up and would
5 like to speak, please see Aaron and sign up for a
6 time.

7 Speakers are asked to limit their
8 remarks to five minutes. If you get to the end of
9 your five minutes, Aaron will ask you to wrap up,
10 and we ask that you do so within 20 seconds.

11 Please note that this hearing is being
12 transcribed, and the transcription will be posted
13 on our website in the next few weeks. Although the
14 Department is not preparing a video or audio
15 recording of the hearing, this is a public hearing,
16 and it's possible that a member of the public may
17 record your remarks.

18 If you have written comments you would
19 like to submit here today, you can give them to me
20 or Aaron. We are also accepting those written
21 comments via regulations.gov through Friday,
22 September 14, at 11:59 p.m. Eastern Daylight Time.

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1 We have three scheduled breaks today.
2 Or, actually, two scheduled breaks today. One in
3 the morning from 10:30 to 10:40 and one in the
4 afternoon from 12:00 to 12:15. We may extend those
5 breaks if we do not have people scheduled to speak.

6 In consideration of others, please
7 silence your cell phones while you're in this room.
8 You're welcome, though, to make calls out in the
9 lobby.

10 When you're called to speak, please
11 provide your name and affiliation. We look
12 forward to your comments.

13 Thank you for your time in sharing your
14 expertise with us. We look forward to an
15 interesting and productive day.

16 MR. WASHINGTON: Mike Saunders?

17 MR. SAUNDERS: Good morning. My name
18 is Mike Saunders. I'm the Legal Advocacy Director
19 of Veterans Education Success. I appreciate the
20 opportunity to share my thoughts and concerns with
21 you regarding the Department's proposed regulatory
22 changes.

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1 Veterans and military service
2 organizations stand united against waste, fraud,
3 and abuse by bad actor colleges. Veterans,
4 service members, their families, and survivors are
5 often targeted by bad actor colleges with deceptive
6 and aggressive recruiting for subpar education.

7 We understand the desire to encourage
8 and improve innovation in higher education but take
9 issue with several of the regulatory rollbacks that
10 we believe will undermine critical protections for
11 students, while permitting low quality education
12 providers to waste or fail to provide an adequate
13 return on taxpayer dollars.

14 The Department must stand strong
15 against this poor behavior and not become an
16 abettor to it.

17 Of the numerous proposed changes today,
18 I want to focus on the following two key issues,
19 the reasonable relationship between programs and
20 entry-level requirements and outsourcing
21 education.

22 The requirement that higher education

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1 institutions demonstrate a reasonable
2 relationship between the length of a program and
3 the entry-level requirements for the recognized
4 occupation for which the student is studying is a
5 common sense regulation that was put in place to
6 combat fraud from unscrupulous schools.

7 The current regulation limits the
8 length of a program that a school can offer, so that
9 the number of hours provided in the program cannot
10 exceed by more than 50 percent the minimum number
11 of hours required for training in the recognized
12 occupation for which the program prepares the
13 student.

14 Removing this regulation will allow
15 schools to arbitrarily choose any number of hours
16 they wish, essentially charging the student for
17 excess education that is not required in that field
18 of study.

19 To put this in perspective, even if a
20 program should only be one semester in length, as
21 required by the targeted occupation, removal of
22 this regulation would allow a school to require

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1 student veterans to use all 36 months of their GI
2 Bill benefits.

3 At many of these low quality schools,
4 students finish a course of study and are unable
5 to get certified or find employment.

6 In a 2015 published report, Veterans
7 Education Success documented that 20 percent of 300
8 GI Bill-approved programs in licensed occupations
9 did not leave the veteran eligible to even sit for
10 the licensing exam.

11 Equally disturbing, with the rollback
12 of this regulation, the school would have no
13 incentive to ensure their students complete their
14 program of study. This would result in schools
15 putting much effort into recruiting veterans and
16 service members to get them in the door and to the
17 first few days of class, receiving the money for
18 the GI Bill for only a few short days of attendance,
19 with no incentive to encourage persistence and
20 completion of a program, and leave the student on
21 the hook for paying back the VA for their wasted
22 GI Bill.

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1 Unfortunately, this is not a
2 hypothetical example, as it has happened in the
3 past, and it is why these regulations were
4 instituted in the first place.

5 Additionally, the cap on the ability of
6 Title IV eligible colleges to outsource
7 instruction to private companies and ineligible
8 institutes is of high importance. Currently,
9 schools must be approved by accrediting agencies
10 authorized by the state and approved by the
11 Department of Education before they can receive
12 federal aid.

13 As it stands, ineligible institutions
14 can enter into outsourcing agreements with
15 eligible institutions to provide 25 percent, but
16 no more than 50 percent, of the educational program
17 the student receives.

18 Repeal of this cap would undoubtedly
19 hurt students by undermining the quality of their
20 education. Weakening the limitations on school's
21 ability to outsource the educational programming
22 would also undermine the oversight system tasked

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1 with ensuring sufficient educational quality and
2 eliminate the deterrence factor currently in place
3 that attempts to prevent these schools from
4 engaging in deceptive tactics.

5 Unscrupulous schools who were deemed
6 ineligible to receive federal financial aid by the
7 Department will partner with approved schools to
8 continue receiving Title IV funding.

9 The Department's own Inspector General
10 found institutions were inflating the value of
11 college courses with little or no oversight from
12 accreditors, demonstrating that there are bad
13 actors attempting to defraud students and the
14 government.

15 The weakening of these regulations
16 would pave the way for similar bad actors to charge
17 excessive fees for no real education, to ultimately
18 hurt those that we represent, service members,
19 veterans, and their families, who use their hard
20 earned military education benefits to go to school
21 and are often the targets of predatory schools
22 looking to capitalize on these benefits.

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1 It is reprehensible that those who have
2 been willing to sacrifice all for our country and
3 chose to pursue necessary training that leads to
4 a successful career would find themselves the
5 victims of predatory schools who defraud them of
6 their hard-earned benefits.

7 It is even more upsetting that the
8 Department would choose to turn a blind eye to this
9 behavior and remove common sense protections that
10 were put in place because this behavior did indeed
11 happen.

12 In conclusion, the Department of
13 Education must be a good steward of taxpayer
14 dollars and keep quality standards that protect
15 both students and taxpayers.

16 MR. WASHINGTON: Thank you. Jimmie
17 Bilbo? Jimmie Bilbo?

18 Okay, we're going to move on to Marshall
19 Hill.

20 MR. HILL: Shall I begin?

21 MR. WASHINGTON: Yes, you can.

22 MR. HILL: Good morning. My name is

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1 Marshall Hill. I'm Executive Director of the
2 National Council for State Authorization
3 Reciprocity Agreements. Thankfully, we have an
4 acronym, NC-SARA, which is a bit easier to manage.

5 NC-SARA is an independent 501(c)(3)
6 nonprofit organization that provides a voluntary
7 regional approach to state authorization and
8 oversight of postsecondary distance education that
9 crosses state lines.

10 Forty-nine states, plus the District of
11 Columbia, Puerto Rico, and the U.S. Virgin Islands
12 are members of SARA. About 1,875 institutions
13 participate, including Xavier University.

14 Our close partners in this work are the
15 Midwestern Higher Education Compact, the New
16 England Board of Higher Education, the Southern
17 Regional Education Board, and the Western
18 Interstate Commission for Higher Education.

19 The matters identified by the
20 Department to be addressed in the proposed
21 negotiated rulemaking are critically important to
22 both students and institutions.

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1 Clear, workable, and effective rules
2 about them best serve all legitimate interests.
3 The issues identified by the Department have all
4 been significantly affected by recent and
5 accumulating changes in higher education, and
6 ensuring that they are addressed in ways that meet
7 the national interests and the needs of students
8 is a goal we support.

9 I'm focusing my substantive comments
10 today on one of the other issues you proposed to
11 address in negotiated rulemaking, the issue of
12 state authorization of distance education.

13 NC-SARA supports the Department's 2016
14 requirement, the one now delayed, that
15 institutions participating in Title IV programs
16 must be able to demonstrate that they have obtained
17 all necessary authorization to offer distance
18 education in each state in which they enroll
19 students.

20 We appreciate the Department's
21 previous determination that institutions could
22 demonstrate that compliance either by documenting

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1 each individual state's approval or through
2 institutional participation in a State
3 Authorization Reciprocity Agreement that covered
4 the states in which the institution enrolls
5 distance education students.

6 We do have some concerns about the
7 late-2016 rule's definition of a State
8 Authorization Reciprocity Agreement, and we urge
9 that that definition be addressed and clarified
10 during the upcoming negotiated rulemaking process.
11 I have provided details of our concerns and
12 suggestions for addressing them in the written
13 materials I have submitted electronically.

14 Finally, having served on four
15 negotiated rulemaking panels convened by the
16 Department, including two of them dealing with
17 accreditation, the number, breadth, and complexity
18 of the regulatory issues proposed to be addressed
19 appear to me to be exceptionally daunting.

20 If a reduction in the number of topics
21 does not meet the Department's goals, I suggest you
22 consider establishing several additional

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1 subcommittees, similar to those you currently
2 propose on direct assessment and the eligibility
3 of faith-based entities for participation in Title
4 IV programs.

5 Thank you for allowing me to comment,
6 and best wishes as you begin this process.

7 MR. WASHINGTON: Thank you. Renee
8 Seruntine?

9 MS. SERUNTINE: Good morning. My name
10 is Renee Seruntine. I'm a student veteran, and I
11 just recently made ten years in the Army National
12 Guard.

13 I went to Full Sail University in Winter
14 Park, Florida, from 2004 to 2005, and received an
15 associate's degree. Between living expenses and
16 tuition, I left school with about \$95,000 in
17 student loan debt.

18 Full Sail University made it seem like
19 after attending their school, I would be able to
20 earn a lucrative salary, which their job placement
21 service would help me find.

22 I never would have spent over \$60,000

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1 on tuition and over \$30,000 on living expenses had
2 I know that three years after I graduated, I never
3 used that education again.

4 Their career development program,
5 which was featured prominently when I enrolled,
6 turned out to be a joke. When I called their career
7 development office, they told me to go to the alumni
8 section of their website, at alumni.fullsail.edu.

9 The website currently says that Full
10 Sail's career development program can provide you
11 with industry resources and valuable information,
12 not that they do or that they will, but that they
13 can.

14 I was not concerned about that at the
15 time I graduated because New Orleans was the number
16 three location in the country for film production.

17 After living in Orlando for six more
18 months because of the devastation wrought by
19 Hurricane Katrina, I returned home to my chosen
20 profession.

21 I quickly learned that I did not need
22 a degree, especially the \$60,000 one that I got from

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1 Full Sail, to work in the jobs that were available
2 in the industry.

3 The pay was good, \$18 an hour plus time
4 and a half after eight hours each day. A very
5 demanding schedule of 15 to 16 hour days. But
6 because of the nature of the industry, the jobs only
7 lasted for a few weeks or a few months at a time.

8 I was constantly out of work and
9 competing with others to jump on the next new
10 project. That was never discussed during my time
11 at Full Sail.

12 Due to the physically demanding work of
13 being a set lighting technician and a grip,
14 something that I should have learned prior to
15 graduation if my training at Full Sail had been of
16 adequate quality, three years after attending
17 school and \$95,000 in debt, I joined the National
18 Guard.

19 Today, I work in the public affairs,
20 doing photojournalism for the Louisiana National
21 Guard, and the debt hangs over me daily.

22 When I went to school, I believed that

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1 it was a quality school since the school was able
2 to offer federal financial aid. I believed that
3 the government's approval of that school to use
4 taxpayer dollars was a stamp of approval on the type
5 of education they offered.

6 I would have never guessed I would be
7 here, 13 years later, still dealing with the
8 pressures of having such high student loan debt for
9 a worthless degree.

10 I thought the Department of Education
11 was looking out for and protecting, but instead,
12 they approved a school that has done nothing but
13 cause me heartache and stress, as I struggle to pay
14 down unnecessary student debt that grows in
15 interest.

16 The Department of Education has a
17 responsibility to protect students like me from
18 schools that take advantage of unsuspecting
19 students.

20 We go to these schools to learn
21 information that will enrich our lives, not to find
22 out afterwards that our futures were sacrificed for

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1 short-term profit.

2 I implore the Department to please
3 consider the impact of their decisions on students
4 like me and to please keep protections for students
5 in place, so others will not find themselves in the
6 same situation I am currently in.

7 Thank you for your time and
8 consideration.

9 MR. WASHINGTON: Thank you. Dr.
10 Michele Ernst?

11 DR. ERNST: Good morning. My name is
12 Dr. Michele Ernst. I am the Dean of SAE Institute
13 North America and the President of Central States
14 Private Education Network, or CSPEN.

15 I appreciate the opportunity to talk
16 today about some of the key issues that are
17 impacting the future of higher education.

18 I've had the privilege of being a peer
19 evaluator for two national accreditation agencies
20 over 20 years. Additionally, my dissertation
21 research reviewed the differences between national
22 and regional accreditation in the implications of

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1 higher education.

2 Accreditation agencies across the
3 country were created as a way to ensure quality in
4 higher education, while also ensuring
5 standardization of expectations of students
6 entering colleges and universities.

7 This fundamental expectation was
8 changed when the accreditation agencies were made
9 the gatekeepers of Title IV with the Higher
10 Education Act.

11 No longer was accreditation about
12 ensuring quality in higher education, but it also
13 became a way to police schools for receiving
14 federal financial aid.

15 We need to refocus on the purpose of
16 accreditation agencies being responsible for
17 ensuring quality, instead of determining whether
18 an R2T4 was calculated properly or whether an
19 institutional loan is administered correctly.
20 While those questions need to be answered, it
21 shouldn't be the role of an accreditation agency.

22 As many are aware, the credit hour

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1 definition was created by the Carnegie Foundation
2 over 100 years ago. It was a system created to aid
3 in the calculation of college professor pensions
4 by gauging how many hours an instructor was
5 teaching.

6 As stated by the Carnegie Foundation,
7 it was never intended to function as a measure of
8 what students learned. Yet, that is what it has
9 become.

10 A student spends so much time sitting
11 in a class and earns a grade of a B, and the
12 expectation is that the student has mastered the
13 learning outcome of the course in order to earn a
14 grade of above average. Unfortunately, this is
15 not always the case.

16 We need a system that determines how
17 much financial aid a student is qualified for,
18 while also communicating to the student, to the
19 public, including the employers, what a student
20 actually learned.

21 This leads me to the discussion on
22 innovation in higher education. There are some

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1 institutions of higher learning that have been able
2 to push the envelope and create some very
3 innovative practices, such as Western Governors,
4 Capella University, Excelsior College, to name a
5 few.

6 However, these schools are the
7 exception, and we have not seen innovation
8 throughout higher education. Certainly, the
9 implications of attempting something unique that
10 might challenge this current system comes with
11 risk, especially with our regulatory environment.

12 As a school administrator, I have found
13 myself continually having to set aside what I know
14 to be a better approach to student learning simply
15 because I cannot make it fit into the current
16 regulations.

17 I've had the privilege of working with
18 a global group of schools, with over 50 throughout
19 the world. During my interactions with my global
20 colleagues, I hear about the innovations that
21 they're able to implement, but yet, very few are
22 things that we can replicate in the U.S., due to

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1 our regulations.

2 Competency-based and direct assessment
3 are innovations that I believe can be a game changer
4 in the U.S. The ability for a student to focus only
5 on learning what they don't know, instead of
6 spending time relearning what they already know,
7 seems like a poor way to teach.

8 I have triplets that are now in college,
9 all three of whom are attending traditional
10 four-year public universities. My son, after his
11 first semester, told me how easy college was
12 compared to high school, and it was in large part
13 because he was being taught what he already knew.
14 He thought he was smarter than everybody else.

15 As a parent and as a taxpayer, you can
16 imagine how disappointed I am, knowing that I paid
17 that much money for my son to learn what he already
18 knew.

19 Clearly, I support the need to commence
20 with a new round of negotiated rulemaking that will
21 address these critical topics. I applaud the
22 Secretary for having the courage to review these

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1 critical components of higher education in an
2 effort to make it better.

3 However, I am concerned about the sheer
4 volume of topics --

5 MR. WASHINGTON: Twenty seconds left.

6 DR. ERNST: -- that are scheduled to be
7 addressed. While they all need to be discussed,
8 it seems it would be difficult to cover completely
9 to reach consensus.

10 Thank you very much for giving me the
11 opportunity to voice my opinion on these matters.
12 I'm very passionate about all these topics and
13 believe that we have the ability to make great
14 changes to the current landscape, which will have
15 lasting effects on future college students, as well
16 as the employers who hire them.

17 MR. WASHINGTON: Thank you.

18 DR. ERNST: Thanks.

19 MR. WASHINGTON: Rachel Farris?

20 MS. FARRIS: Good morning, thank you
21 for this opportunity. My name is Rachel Farris,
22 and I serve as Registrar for Columbia Southern

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1 University, and have for the last 13 years.

2 Prior to joining CSU, I served in the
3 United States Navy for the same amount of time. I
4 take pride in my chosen profession, and I am
5 passionate about providing the necessary support
6 to see our students succeed, no matter where they
7 attend.

8 It is also my pleasure to support my
9 fellow veterans and active-duty military students,
10 which represent approximately 40 percent of CSU's
11 nearly 30,000 active student body.

12 CSU is a private, family-owned, fully
13 online institution that serves students across
14 many professions. CSU is accredited by the
15 Distance Education Accrediting Commission, which
16 is a national accreditor recognized by the U.S.
17 Department of Education and CHEA.

18 In addition, CSU participates in
19 Quality Matters, a nationally recognized
20 faculty-centered peer review process that
21 certifies the quality of online educational
22 courses.

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1 I appreciate the Department reviewing
2 the regular and substantive interaction, the
3 credit hour definition, and state authorization,
4 among many other areas affecting accrediting
5 agencies and institutions.

6 However, today, I would like to
7 specifically share an issue I see all too often as
8 the Registrar. Because CSU is nationally
9 accredited, our students are oftentimes denied
10 acceptance of their earned credit or are denied
11 entrance into a graduate program, a decision based
12 solely on accreditation, with no comprehensive
13 review of the program.

14 It is not uncommon for CSU students to
15 encounter transfer credit and admissions policies
16 that indicate only credits or degrees from
17 regionally accredited institutions are accepted.

18 This happens even though the Department
19 of Education and CHEA recognizes both national and
20 regional accreditation.

21 Furthermore, CHEA, the American
22 Council on Education, and AACRAO, issued a joint

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1 statement on transfer credit and award of the
2 credit that states, institutions and accreditors
3 should ensure that decisions about awarding
4 transfer credit are not made solely on the source
5 of accreditation of the sending program or
6 institution, and further states that students
7 should have reasonable explanations when credit is
8 denied.

9 Despite this strong support for merit
10 review when determining transferability of credit,
11 we continue to see the denial of earned credits with
12 no review or explanation, other than the sending
13 institution is not regionally accredited.

14 Interestingly, it is common for
15 admissions policies to accommodate international
16 students holding academic credentials from foreign
17 institutions to receive a review based on merit,
18 but exclude a U.S. citizen who has earned a degree
19 from a nationally accredited domestic institution.

20 In an effort to further assist these
21 students, my office prepares transfer packets
22 containing instructor credentials and curriculum

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1 information to encourage a merit-based review.
2 Unfortunately, these efforts do not work if the
3 receiving institution chooses to base transfer
4 credit decision based solely on accreditation.

5 Discussing the issue of denied credit
6 or a degree not meeting admissions requirements
7 because of national accreditation is disheartening
8 and a source of student frustration. These
9 practices do not honor the student's investment of
10 time and money, nor does it promote timely program
11 completion with minimal financial debt.

12 I am not a proponent of regulations as
13 a solution to fix every issue. I support each
14 institution's responsibility for establishing its
15 own academic policies.

16 However, I do believe that earned
17 credits from a recognized institution should be
18 granted a fair and merit-based review prior to a
19 decision to deny the credit.

20 I understand why so many states have
21 passed regulations to provide for the transfer of
22 credit between community colleges and public

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1 four-year institutions.

2 I hope the Department can further
3 explore this issue affecting so many students
4 during this negotiated rulemaking session and
5 determine a proper solution that respects the right
6 of institutions to establish its own policies,
7 while requiring transfer credit practice described
8 in the joint statement.

9 I believe that we all want to promote
10 timely program completion, the ability of a mobile
11 student population to transfer earned credits, and
12 for all students to be treated fairly.

13 CSU will follow up with written
14 comments.

15 MR. WASHINGTON: Twenty seconds
16 remaining.

17 MS. FARRIS: Thank you for the
18 opportunity to share my remarks.

19 MR. WASHINGTON: Thank you. We've
20 reached the end of our registered speakers. If
21 someone who has not already spoken wishes to speak,
22 you can come forward at this time.

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1 If you haven't signed it, please sign
2 in at the table here with the sign-in sheet. I did
3 notice a few folks came in after we began.

4 And I will be here until our first
5 break, if anyone wishes, that hasn't already
6 spoken, wishes to testify. Thank you.

7 (Whereupon, the above-entitled matter
8 went off the record at 9:32 a.m. and resumed at
9 10:31 a.m.)

10 MR. WASHINGTON: Hello, everybody.
11 We have decided to change the break schedule, based
12 on not having any speakers for the remainder of the
13 day. We are going to take a break from 11:00 to
14 12:15.

15 So we're not going to take a break now,
16 we're going to take a break from 11:00 to 12:15.
17 And we will reconvene at 12:15 until 1:00 p.m.
18 Thank you.

19 (Whereupon, the above-entitled matter
20 went off the record at 10:31 a.m. and resumed at
21 11:00 a.m.)

22 MR. WASHINGTON: We're going to break

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1 from 11:00 to 12:15.

2 (Whereupon, the above-entitled matter
3 went off the record at 11:00 a.m. and resumed at
4 12:17 p.m.)

5 MR. WASHINGTON: Hello, everybody.
6 We are reconvening for the rest of the day. So
7 anybody in attendance who would like to come and
8 speak that has not spoken, please come forward. We
9 will finish the day at 1:00 p.m.

10 (Whereupon, the above-entitled matter
11 went off the record at 12:18 p.m. and resumed at
12 1:01 p.m.)

13 MR. WASHINGTON: That concludes our
14 public hearing. Thank you all for coming.

15 (Whereupon, the above-entitled matter
16 went off the record at 1:01 p.m.)

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