

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

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

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

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

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

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.

In order to best use the time of the committee, prior to its first meeting we plan to provide draft proposed regulatory language for discussion by the negotiating committee and the subcommittee, rather than the issue papers we have 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.

With respect to the logistics for 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.

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.

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.

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

To put this in perspective, even if a program should only be one semester in length, as required by the targeted occupation, removal of 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.

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

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.

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

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 Columbia, Puerto Rico, and the U.S. Virgin Islands  
11  
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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I'm focusing my substantive comments today on one of the other issues you proposed to address in negotiated rulemaking, the issue of 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.

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

I never would have spent over \$60,000

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on tuition and over \$30,000 on living expenses had  
I know that three years after I graduated, I never  
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](http://alumni.fullsail.edu).

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

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

I quickly learned that I did not need  
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.

I was constantly out of work and competing with others to jump on the next new project. That was never discussed during my time 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.

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

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

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

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

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

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

1 statement on transfer credit and award of the  
2 credit that states, institutions and accrediting  
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

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

I am not a proponent of regulations as  
a solution to fix every issue. I support each  
institution's responsibility for establishing its  
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.

I understand why so many states have passed regulations to provide for the transfer of 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.

If you haven't signed it, please sign  
in at the table here with the sign-in sheet. I did  
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.

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.

22 MR. WASHINGTON: We're going to break

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1 from 11:00 to 12:15.

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.

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

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