

**APPENDIX G – MEETING TRANSCRIPT OF THE PERSPECTIVES OF THE
ACCREDITORS PANEL**

CHAIRMAN STAPLES: Panel, I appreciate you being there. We'll get started. We have a break after this panel, but we want to jump right into this, so that we get the benefit of your input and also, since there are five of you, I want to make sure that we don't cut the time short.

Again, thank you. I know you've sat here all day patiently. I'm sure you're looking forward to your opportunity to make your presentations, and our agenda -- we'll proceed in the order of the agenda, which has Barbara Brittingham going first. Welcome Barbara.

DR. BRITTINGHAM: Thank you. I'm Barbara Brittingham, and I'm President of the Higher Education Commission for the New England Association of Schools and Colleges, where I've worked since 2000.

I also serve on the quality assurance bodies in Ireland and Iceland, and I appreciate the opportunity to be with you today and appreciate your interest in this. NACIQI has demonstrated an

understanding of accreditation, and I also appreciate your stamina today, and I know that you've been looking forward to our sessions, as we have.

In regional accreditation, we take our responsibilities very seriously, both our federal responsibilities as reliable authorities on the quality of education, and the improvement function that we serve for our institutions.

As we look forward to the next reauthorization, I've spent a few minutes looking back to see how our regional accreditation has changed since the last reauthorization. We now have more frequent interaction with our institutions. We have better tools for monitoring institutions that are fragile, either financially or academically.

We have a program of special monitoring for institutions that have been sold or have a change of control. We have more workshops annually to train evaluators and support institutions, and we have more quantitative and qualitative evidence to support the reviews, with a greater focus on assessment and measures of student success.

In New England, we've started a series of meetings with the SHEEOs of the six New England states, and we've been joined recently by the head of the Boston Federal Financial Aid office. So we have our own little triad in New England.

So we have better tools to enable oversight that's stronger and targeted when it's needed, and I know this is true of the other regionals as well, that each have made their own changes.

For our commission, some institutions we see twice in ten years; for others, the commission may see it eight or ten times, through a combination of follow-up and substantive change initiated by the institution.

What's working well in accreditation? I would say I want to focus on three things. One, the participation by the members. Our commission is doing the mid-course review of its standards, and we held a series of meetings around our region. The invitation to participate was accepted by 90 percent of the institutions, and this ownership of the

standards builds understanding and commitment, which is fundamental to our system of self-regulation.

We have a system that I believe is a fundamentally sound system, and when we have a system that's as complex and decentralized as we have in this country of higher education and accreditation, I am worried sometimes about the potential for harm of any radical change.

We have some indicators that our system is fundamentally sound. I think first of all the quality of our volunteers, who are extraordinary; by the institutions that participate, who are regionally accredited without any Title IV incentive; and by the seriousness with which even our best institutions prepare for their reviews. Better that we continue to improve our system than to radically rearrange it.

We also meet what I think are interesting international expectations. The World Bank recently did a study of quality assurance organizations, and came up with three criteria of a good system. One has to do with ensuring minimal levels of quality; one has to do with ensuring improvement; and the third

one has to do with fulfilling both of those at a reasonable cost, not to exceed the estimated benefits.

I note these criteria are interesting because they include the minimum standards and promoting quality, which they see as complimentary and not intention or opposition. The U.S. system of regional accreditation, I think, is probably the most cost-effective system in the world, because we are able to rely on expert volunteers so heavily.

So when I look at the ratio of staff members to institutions, in New England it's 24 institutions per staff members. In some countries, it would be five or even three institutions per staff member. So this is an extraordinarily cost-effective system.

Can we make it a better system?

Absolutely, and I have -- we have three priorities for improvement, which we are working on and need to continue working on. One is to get better with learning outcomes and measures of student success.

There have been a lot of initiatives. You

heard about some of those. Our commission has some, as do the other regionals, but there's plenty more to do, particularly in ensuring that the data is useful for improvement.

We need to get better at helping the public understand accreditation, and you've heard about that as well, what accreditation does do and what it doesn't do, and we need to get better at assuring the public has the information they need about accredited institutions.

We believe that this information primarily comes from the institutions themselves, and that they have an obligation to provide information that's relevant to public needs, current, clear and easily accessible.

One of the topics that you had also was what's working and what's not working, and what could be better in the recognition process. I would say one of the strengths of it is the quality of the senior staff, and I would mention Kay Gilcher and David Bergeron, in particular, who have been extremely helpful to us in our work, and we're

grateful for that.

But I think there is room for improvement, and as you look ahead to the reauthorization, I would mention three things. One is our agency has been recognized continuously since the 1950's. Every time we come up for recognition, we feel like we are starting from scratch.

So while the regulations have remained constant in many cases over the years, we still must go back to ground zero. Second, I think -- thank you. NACIQI has very few tools to use. We've heard of the either/or with accreditation. I sometimes think that your committee is closer to that than would be useful either for you or for institutions.

Third, I would ask that you recognize the limits of regulations, illustrated by the NCAA handbook for Title I schools, which is 444 pages long, and I think demonstrates that more regulation doesn't always solve the problem.

Just in conclusion, what I hope for the future is that regulation should respect the diversity of institutions, especially when it comes

to student learning. Where you identify problems and challenges, you see an elegant or parsimonious solution. Finally, given the extraordinary quality and dedication of our volunteers, I ask that as you think of changes, you find ways not to harm the advantages that our system has now. Thank you.

CHAIRMAN STAPLES: Thank you very much.

Neil Harvison.

MR. HARVISON: Good afternoon. My name is Neil Harvison. I'm the Director of Accreditation and Academic Affairs for the American Occupational Therapy Association. In addition, I am currently serving as a member of the board of directors of the Association of Specialized and Professional Accreditors, also known as ASPA.

ASPA represents United States agencies that assess the quality of specialized and professional higher education programs in schools. ASPA member accreditors set national educational standards for entry into 61 specialized disciplines and defined professions.

Currently, 41 of our agencies are

recognized by the Secretary, which represents over 70 percent of the agencies currently recognized. I've been asked to provide some brief remarks on what is working and not working in the current system.

Fortunately from the perspective of specialized and professional accreditors, there's more working than not, as far as we're concerned. The overwhelming majority of our agencies are experiencing a growth in programs and institutions seeking accreditation at this time.

Our accredited programs enjoy high graduation and employment rates, and continue to attract students from around the world that recognize United States' programs as the gold standard in their respective fields. In addition, professional organizations and educational programs in foreign countries frequently adopt our accreditation processes and seek Accreditation by U.S. agencies.

The strength of our system lies in a number of important principles that are supported in the current statutes, and should be protected through the next reauthorization. Just briefly, some of

these principles would include the independence of the institutions of higher education, accrediting organizations, the federal government and the state government.

Secondly, the respect for the decision and independence of the institution as accreditors in academic matters. Thirdly, the protection of procedural fairness, which is required for the purposes of trust, consistency and effectiveness.

Fourthly, the respect for the differences in institutional purposes, missions and goals, and the differences in disciplines and professions that inform a variety of structures and approaches to higher education, i.e., the one-size-fits-all regulation doesn't always work.

Then finally, the strength of our peer review process. Continuing to respect and fulfill the requirements of these principles is essential to the success of higher education accreditation and their relationship. We would ask the Committee, when preparing their report for the Secretary, to support the protection of these basic principles that have

served as the foundation for what is right about recognition and accreditation.

We recognize that this will be a challenge. Our concern is the first response of any perceived or real crisis in higher education is to call for increased regulation. While the authors of these changes had the best intentions, many of these regulations lead to unforeseen consequences that violate the basic principles underpinning of the strengths of our higher education system.

Ultimately, the protection of the stakeholders remains the primary concern to us, the professional and specialized accreditors. When developing regulations and criteria for the recognition process, we would ask that certain points be taken into consideration.

One, regulations remain consistent with the text and the intent of the law. Two, regulations only address the operational practices of the accreditor under law, and are not used to regulate programs and institutions by forcing accreditors to require programs and institutions to address specific

content, use particular methodologies, etcetera.

Thirdly, regulations that recognize and support the diversity of the type of knowledge, disciplines and professions, by recognizing that this content diversity also requires methodological diversity in accreditation and education.

I would add that we do appreciate the many strengths and benefits about the U.S. DoE and CHEA recognition processes. The existence of both a governmental and non-governmental recognition body plays a vital role in ensuring the quality of Accreditation in the United States.

In summary, we're not surprised that many, much of the debate in the field focuses primarily on what some stakeholders perceive as being wrong with the system of recognition and accreditation. We would argue, however, that there are many strengths in the system that should be protected through the next reauthorization.

The stakeholders in professional and specialized accreditation continue to support this process, and identify the benefits that the

accreditation process brings to our programs and professions. Thank you.

CHAIRMAN STAPLES: Thank you very much.

Michale, Mikhail McComis.

MR. McCOMIS: Thank you. Good afternoon.

Thank you for the invitation and the opportunity to speak here this afternoon. My name is Michale McComis. I am the executive director with the Accrediting Commission of Career Schools and Colleges. It's not a typo, Cam, I know. It's just spelled funny, and I've been the executive director since 2008 and have been with the organization since 1994.

I've provided to you some written comments, and I'm not going to read those. I'm sure you can do that on your own. I thought I would take a few minutes and talk a little bit about some of the things that I've heard here today, and maybe react to some of those, but keeping it within the context of the primary question of what's working and what's not.

So based on my experience, accreditation

works best when those that participate in it believe and contribute to the betterment of the institutions, what I call the accreditation compact, and it requires both the accreditors and those institutions to act in a partnership, to bring about what is the best level of quality of education for their students, and that institutions get out of accreditation what they put into it.

What Professor Arum talked about today, as an alignment of core values, and that it's very difficult to legislate or maybe even impossible to legislate behavior, and that really that this issue comes down to the role that the institutions play with their accreditors, to really engage in that process at a very high level.

I was interested to hear Dr. Rhoades say that the faculty need to have a threat of failure to participate in this institutional improvement process. Really, this is quite different than what Dr. Ochoa indicated as a provost, as one of the most, a very meaningful opportunity that he experienced going through that.

So you have really two different sides, and much of it is dependent upon the attitude of both sides, but very much the leadership in the institution, both on the administration, the faculty and within the accreditation community.

I believe that regulation, whatever we come up with or whatever we determine it should be, should be an expression of best practices in the accreditation process, just as accreditation standards should be an expression of best practices in institutional operations and delivery of education, and that we should all embrace our role as gatekeepers, but the requirements to serve as a gatekeeper in that function should be appropriate and allow for the type of flexibility and innovation that brings about the best results.

I want to maybe speak a few minutes to debunk a few myths that I think were mentioned today. One of those is that this is -- nobody ever loses accreditation. Well certainly that's not true for mine or many other accrediting agencies.

Now this really cuts as a two-way sword,

because when we remove an institution's accreditation, we're told that oh well, you take it away from so few, it's really meaningless. On the other side, oh, you had to take accreditation from somebody. That means that your schools are bad. So either way, we end up really stuck in a pickle.

But certainly the accreditors do their role along those particular lines. But it's not just a pass/fail system, because there are a variety of interim steps and probations and show cause orders and reporting and heightened monitoring and all of these things that over time seek to achieve the mission of improving institutional success.

That is the role of accreditation first and foremost. It is not to be a police force. It is not to be an enforcer of federal regulations, although of course there is the gatekeeping role. So there are also maximum time frames and adverse actions that must be taken when those maximum time frames are very close.

Now we've also heard about people talk about there should be gradations of accreditation. I

think that's a very good idea. We haven't quite gotten there yet in my agency, but we do do things like award of school of distinction or a school of excellence to those that go through the accreditation process and achieve certain levels of student achievement.

So let me talk about student achievement with regard to outcomes, and what I've heard about no outcomes or outcomes that aren't good enough. My agency has the luxury of having a quantitative and qualitative approach, because we do career education, we do vocational education.

Therefore, we're able to really focus in on graduation and employment rates quantitatively, to look at benchmarks, and then to compare those benchmarks, and for those institutions that fall below them, to focus on how to improve those programs, because we see that as a primary role and goal that we have within that process.

So there are outcomes that exist. There are outcomes that look at graduation. There are outcomes that look at employment specifically, and I

will say we've had those outcomes measures in my agency for about 15 years. We've been measuring and collecting data for about 18, and it wasn't an easy process to get there, and it wasn't clean and it was messy at times.

But it has made our institutions better and it's made our institutions more accountable. But again, we're a career and vocational accreditor, and we have the luxury of being able to look at those things, and to look at them outside of the vacuum of more complex questions revolving around liberal arts-based education.

Some say that there's an inability to see value in accreditation. We recently went through a systematic program of review with the National Center of Higher Education Management Systems, Peter Ewell's group, and received exceedingly high marks from both institutions and students and employers as well, indicating that our standards of accreditation are relevant and do lead to quality of education.

We also just recently completed our petition for re-recognition with, for the June

meeting of NACIQI. So I imagine that you'll be reading that with great pleasure and commitment. We use our petition process as one of a self-evaluation process, because we believe that, just as an accreditation, this is an important way for us to improve ourselves.

We look at the federal regulations as an opportunity to say what are we doing well and where can we exceed what are some of the minimum requirements of those, and how can we make our organization better? We've looked at the way that we do student achievement. We look at the way that we do information-sharing. We understand that there are ways still in those areas that we can improve.

Finally, I would just say that we really look forward to the opportunity to be working together with NACIQI, with the Department and with the Congress, to come up with a reauthorized Higher Education Act that does reflect again the best practices in accreditation, that lead to the best opportunities for students. Thank you.

CHAIRMAN STAPLES: Ms. Wheelan.

DR. WHEELAN: Thank you, Mr. Chairman. I am Belle Wheelan. I serve as President of the Southern Association of Colleges and Schools Commission on Colleges, which is the regional accrediting body for the 11 southern states, Latin and Central America. We have one institution in Dubai.

I thank you for giving all of us this opportunity and thank you for accepting the challenge to deal with this very heady issue. I have submitted remarks that dealt with two of the issues that had been identified in your list of things to consider.

One was the role of the triad of federal government, state government and accreditors, and the other was the recognition process itself. I think we have probably said as much as we can say about the role of those three triads, so I'm not going to reiterate those.

I wanted to spend the time I would have done that talking about some of the things that were addressed this morning, just so I could get my say in.

Number one, to Mr. Miller's comment, I am not aware of any prohibition by any regional accreditor of any of its members serving on any of the One Dupont Circle organizations. I mean it just doesn't happen.

Some of our members, you know, are presidents of those organizations. So I'm not sure why his organization prohibits that, but none of the rest of us do. I'm sorry. I also failed to mention that I serve as chair of the Council on Regional Accrediting Commissions, which is all seven of the regional accreditors and their chairs.

A comment was made about the cost of accreditation. I've been a college president and a college provost, and I've had to put those bills together. Because they happen once every ten years, it seems like an exorbitant price. But I'm always reminded of that bumper sticker that says "If you think education is expensive, try ignorance."

It does seem like it's a lot, but when you pro-rate it out over the ten years for our region, it's not really that, as much money as it seems. But

more than that, some of those costs are also a direct result of federal regulation that has gone in place.

A classic example is the student authentication mandate, that just came in with the last HEA, where institutions are going to have to find ways to authenticate the enrollment of students who are distance learning courses.

Transfer of credit has also been an issue, and someone alluded to the fact that the regional accredited institutions don't accept credits from nationally accredited institutions. I have SACS-accredited institutions that don't accept credits from other SACS-accredited institutions.

So it has diddly to do with whether it's a national or a regional accreditor; it's because the faculty at the institutions determine what they want to accept and what they don't. More often than not, since the national accreditors are newer, when you look at the age of the regional accreditors, and many students who have come from them have not been prepared in the faculty's mind, then they're a little reticent on accepting those credits, which is why I

think the national, I mean the for-profits especially, have come to regional accreditors.

There are more similarities than differences among the regionals, and I think that's evidenced by the rules and regulations of the federal government, with which we all have to be in compliance. So we have regular meetings of the execs and our chairs to talk about, you know, what are we doing.

I think that the problem is that because we have a different process in each region by which to carry those out, then people don't always see the similarities and they see us as seven discrete entities, when we really have more in common than not.

I think there is a lot of creativity that's going on. The NILOA study that was alluded to earlier, it's sad that the main reason that institutions are doing assessment of student learning outcomes at all is because accreditors have pushed it.

So I take credit for that. Thank you very

much. We appreciate that positive compliment today, and it is because we don't have that standard, if you will, across the board, that institutions are allowed to demonstrate compliance because of the creative thinking of the faculty and administrators within their institutions.

What else is working? Well, I think with the Department, we have been able to have a very effective data-sharing system that goes on. Much of the action that is taken by the Department on an institution comes from the reports that we submit to them.

So I think that we have had wonderful cooperation that's been going on since the 50's. I think having the involvement in the conversations and the negotiated rulemaking process, and the guide that was developed for you all, we have that opportunity to say, you know, what makes sense, what doesn't to us and the Department listens to that.

What's not working. Well, we have a few things that aren't working, I think. One of them has to do with shifting from policy adoption to mandatory

implementation. When there is a finding by the staff that's called for correction, then that agency has to demonstrate that it's adopted it with a policy or protocol immediately.

The problem is none of us make changes without input from our members, and so there's a time there where we get caught, if you will, in trying to implement that protocol. Also, long before the agency comes before NACIQI, we have to address new requirements that are under legislation.

Under our own policies and federal regulations, no new policies affecting institutions can be adopted without first circulating a draft for comments among all the stakeholders.

It's also happened sometimes that one agency will get cited on something, and then all of us suddenly have to change what we're doing as a result of it when, you know, we've already got policies and that just lengthens the whole process.

I had some suggestions for improvement that were also there. One was to provide greater advance notice of the acceptability and agency

efforts to address new legislation and regulatory provisions, rather than waiting until each agency individually comes up for recognition.

Another is to take greater account of the cost and burden of developing and implementing regulations, and expecting new policies to be developed within a very short period of time; to establish within each regulatory area a compendium of findings of certain agency responses found acceptable.

We often don't know what worked or what was accepted in one agency's report, unless we just happen to talk to each other or see each other over coffee. We don't know. So if there could be some way that we could know already what worked and what didn't.

And create opportunities for challenge to staff interpretations. We have different staff in the Department that are interpreting things differently, and oftentimes we have two different staff members coming up with two different interpretations. So to which one are we held

accountable?

So I think there is room for change, but all in all, I think it's a wonderful system. This is my 37th year in higher education. I know I look good for that long length of time of service --

(Laughter.)

DR. WHEELAN: And every agency at which I've worked has been a regionally accredited organization. I have witnessed firsthand the growth that happens in institutions when peers from outside of their institution and even outside of their state comes in and says this looks good, this is working, the exchange of information back and forth, the professional development that occurs is the best that we've had since 1890-who? When did you start, 1885.

I think that because there's more money attached to it now, then it's gotten more attention, and I can certainly understand that. The golden rule is he who has the gold makes the rules. But nonetheless, I think we have a system that works and with some strengthening and tweaking, it can be even better. Thank you.

CHAIRMAN STAPLES: Thank you. Mr. Williams.

DR. WILLIAMS: Thank you, Mr. Chair, members of the Committee. I've been education, higher education for only 34 years, five of them at George Washington University, another seven operating a voctech school, and the last 20 as executive director of the Accrediting Council for Continuing Education and Training.

ACCET has been recognized by the Secretary or actually the predecessor Commissioner of Education in 1978, almost lost its recognition before this body in 1989, and I was brought in 1990, at which stage I presented before this body probably three times in a period of three years, likely not ever a good sign of our status at the time.

We have, however, worked very hard over these many years since, focused very heavily on what we consider to be important outcome measures, very much aligned with Michale here, relative to the vocational component of our institutions, about 50 percent of which are classified as vocational.

The other half makes us somewhat unusual, in that they are largely continuing education in the classic mode. Many institutions offering intensive English programs and a number of corporations. We accredit, for instance, the Saudi Aramco Oil Company's technical and engineering training department, continuing education departments, and we do get paid in barrels of oil incidentally, which we think is very profitable these days.

I do have some remarks that I think are fairly brief. Accreditation of our postsecondary institutions remains sound in concept, and while facing increasingly skeptical questions of its validity and reliability in practice.

Agencies should be challenged to raise the bar in my opinion, far more than they have in the past, although there's certainly been a good deal of progress, I would say, in the last ten years, in order to be deemed worthy of the formal recognition by this body as reliable authorities on the quality of training offered.

Ultimately, two questions, I believe, must

be answered affirmatively, with demonstrated evidence of support. One, the accrediting standards and evaluation processes of the agency, are they actually improving the quality of education, as opposed to institutions that are simply good, regardless of accreditation, so as to make the benefit of the public, to the public apparent in the accomplishment of student learning outcomes, the most critical element of all, and to the institutions themselves relative to the costs and demands on their staff.

Two, the question is there a discernible pattern of specified grounds and corresponding actions taken by the agency over time, that an annual report to the Department and the general public would serve to provide convincing evidence, something that's greatly lacking right now, of the rigor in the decision-making process.

Accreditation is too important to our nation's future to be harnessed to the past, with accountability so frequently challenged to be demonstrated with results. Higher expectations, particularly by this body, would better preserve the

benefits of our agency's independence, to the ultimate benefit of the students, the taxpayers and the institutions themselves.

To that end, I would offer just five items abbreviated to consider. The accreditor should establish evaluative rubrics appropriate to mission-compatible groupings of institutions, recognizing that there is a great deal of variety in our higher education, including expected qualitative and quantitative performance criteria to be assessed as benchmark measures of successful student achievement.

Until such time as agencies have fully developed and implemented a set of rubrics, at minimum, a standard that specifically requires the institution to have its own internal evaluative system in place to assess its effectiveness should be required.

The agency should also be allowed considerable latitude beyond this general requirement, so as to inspire the great potential of peer review in such a complex endeavor, which would otherwise be stifled or likely worse by an overly-

prescriptive statute or regulation.

Bullet item two. The maximum grant of accreditation should be no longer than that allowed by the Secretary for the maximum period of recognition for accrediting agencies, unless the institution can demonstrate compelling evidence of systematic and effective monitoring during the period of the grant, to ensure appropriate ongoing review for compliance with the agency's standards.

ACCET has found a midpoint quality assurance unannounced visit to be very effective, above and beyond the annual reporting requirements that include completion and placement data under our system.

Additionally, agency petitions should include an analysis of the varied lengths of accreditation granted over time. Favorable consideration might be given where the pattern suggests determinations that take into account the great diversity of American higher education, recognizing exemplary institutions for their higher order achievement of the agency's standards.

Similarly, shortened grants of recognition by NACIQI would offer a comparably salutary impact on agencies, a practice that was done many years ago and has since not been utilized.

Item three, a uniform attendance requirement should be established during the first academic year for all students, and should be considered a definitive element of satisfactory academic progress. Students who do not regularly attend classes are encumbered by poor learning and unproductive if not ruinous debt.

With the increasing likelihood of radically shrinking budgets, looming large in both our immediate and long-term future, reserving funding for access to those both in need and making the effort to maximize their odds for success by attending classes regularly would greatly enforce its importance to this benefit.

Item five, the issue of increasing transparency of agency practices and actions has often been raised as an important step for improving public awareness and confidence in our agencies. By

way of example relative to a concern that we have for transparency purposes is the need for consistency of well-defined criteria for the data that is collected and published.

Those agencies, for instance, utilizing placement rates as an outcome measure, which ACCET does and a number of the other national accrediting agencies do, would need to be aligned with some mutually agreeable reporting requirements, such that the basis of its reporting followed sound practice for documenting the results, wherein training-related employment would be defined with some restraints to the overly-broad interpretation.

Otherwise, the validity of the data would be subject to question and marginalized in its benefit to the public, as well disadvantageous to those institution that more rigorously follow good practice.

Finally, the administrative appeal process mandated by the previous HEOA for agencies to follow should be revised, to allow the Commission to consider the panel's findings, but to be the final

decision-maker, as opposed to the appeals panel itself.

The Commission is the properly elected and recognized body for such determinations, and we think that that change would be a very important step in the right direction. Thank you.

CHAIRMAN STAPLES: Thank you, and thank you all for your comments. Members of the Committee with questions? Susan?

COMMITTEE MEMBER PHILLIPS: I've got a couple of questions. A number of you spoke about the possibility of a tiered system or reacted to that idea of accreditation. I wonder what you think about that idea for the institutions that you accredit, and I also wonder what you think about that as a system for the recognition of accreditors? Anybody can reply.

DR. WHEELAN: I've never been at a loss for an opinion, thank you. If we're talking about a seamless system of education, then that makes little sense to me, because this way we've got institutions from all sectors of higher education, accredited by

the same body, doing the same standard, so that there is a better flow and understanding, and actually trust of senior institutions of community college work, of technical programs, of for-profit programs.

So I'm not sure a tiered accreditation system would help anything, would serve any purpose. This way, we know the set of standards; we can talk about what's necessary to transfer to another institution when you talk about English 111 at one institution, you know. Then you can kind of have some comfort that it's across the board.

So for me, having a regional accrediting body accredit institutions at all levels, rather than sectors. Is that not what you were asking?

COMMITTEE MEMBER PHILLIPS: Oh no. I'm thinking more of a --

DR. WHEELAN: One star, two star?

COMMITTEE MEMBER PHILLIPS: You passed the bar, you're way above the bar, that kind of recognition.

DR. WHEELAN: Oh. Yes, I got you.

COMMITTEE MEMBER PHILLIPS: Exemplary

versus minimum.

DR. BRITTINGHAM: We've heard that a lot and I, you know, I guess I would have a couple of concerns about it. One is that our system relies a lot on candor, of institutions being willing and able to examine themselves very closely and put forward, you know, what their concerns are.

One of my concerns about that is that it would up the pressure to look good. I would bet a dollar of my own money that the tiers would immediately be absorbed by the ranking industry, and that would -- one star, two star. So that, I think, would feed that reluctance to be candid in the self-study process. Those would be my concerns about it.

DR. WILLIAMS: I would take an opposite position. I think that for our agency, for instance, about half the schools that we accredit get a three-year grant. The maximum allowed is a five-year grant, and I think in point of fact that that results in people aspiring to a higher level.

When I made my comment with regard to this agency's perhaps considering shortened grants of

recognition, the same thing I believe occurred in the early 90's, when that was a fairly common practice, because no one wants to get less than the maximum. It's embarrassing frankly, but it's also, on the other hand, inspirational is perhaps a more positive way to look at it.

I think institutions that do not all just meet what some people call minimum standards, but rather meet standards and demonstrate that they go above and beyond, should be recognized accordingly.

MR. McCOMIS: Yes. I'm certainly intrigued. As I said, we don't have these distinctions, but we give awards, and those awards are based upon whether you are above average through the majority of your programs and with regard to our student achievement outcomes, or if your -- all of your programs outpace what our standards, our minimum standards or benchmarks require.

So we've thought about that, again as a way to incentivize institutions to reach for the highest level of performance, and certainly when those institutions get those awards, they aren't shy

about sharing that information.

So I could see it going to Roger's point about developing these rubrics, about you know, scalability is very important in accreditation, but you can still achieve compliance across a wide swath of different types of institutions using those scalable approaches, and also make some determinations using appropriate rubrics about whether they minimally or far exceed those standards. So it certainly is an intriguing idea.

MR. HARVISON: I'd agree. We have terms of accreditation, and I think that that works. Programs strive to get the full term of accreditation. That's what they're looking for, and what the benefits that go with that. I have lots of concerns about ranking systems, and what that brings to it, because it does bring it to high stakes, which has the potential of increasing costs all around.

CHAIRMAN STAPLES: Arthur and then Art.

COMMITTEE MEMBER ROTHKOPF: Question for the two regional accreditors. I don't think that it sort of pertains to the others. There's been, you

know, lots of criticism leveled today, and you all are reporting. I look at your testimony and what I hear, that you know, everything's going pretty well. You obviously need to do some things better and we always want to improve.

What reaction do you have to Professor Arum's research, which at least if you accept it, indicates that students really are not -- I mean I don't want to do blanket, but some students are doing pretty well, but a lot of students are not doing very well, and they're not showing progress, either very little or not at all from Year 1 to Year 4.

How does that square with the sort of positive view that you have of accreditation as ensuring quality?

DR. BRITTINGHAM: I've bought the book but I haven't read it, so I'm going to refrain from giving an opinion about it. But the day I read the articles about it, the first day, one of the interesting things to me was David Brooks' column in the New York Times, and he was talking about the skills of negotiating the 14 year-old lunch room, and

how important those skills really are.

I thought how interesting for him, in particular, to be writing about those skills, which are not very well related to the Collegiate Learning Assessment. Then, there are whatever those things students are learning now from all this technology, that I don't think we've begun to understand what it is they're learning.

So I have bought the book and I want to read it, but I think it's -- you know at best, it's part of the picture.

DR. WHEELAN: I have not read the book either. I've read the executive summary, and the first questions I had was the sample, you know, and how large it is. We have a very bad habit of making gross generalizations based on what I consider a small sample, and when you consider that they are over four million students in higher education, to have 2,500 or whatever in it doesn't seem that many to me, number one.

Number two, it could very well be that those students came with the skills that they needed,

that that assessment is measuring. It could be a problem with the assessment, as opposed to, you know, a problem. I mean I don't know, because I don't know what level it was -- the students had when they came in, and you know, pre/post test kind of thing.

There is a reality that we have a different student today than we've ever had before, and they are much more into reacting to things than trying to interpret things or think about things. So from the critical thinking skill scale, I agree that our students are lagging behind.

Many of our institutions, however, are aware of that as well, which is why in my region, when they're doing their quality enhancement plan, they're focusing on improvement of critical thinking skills or math skills or writing skills or reading skills, because they recognize that those are the skill sets needed to be successful in whatever career they are.

Many students are also focusing on -- they're bored, because in many of our general education courses, it's the same content, in their

mind, that they had in high school, and they didn't like it then and they're not going to like it now. Which is why many faculty are taking to try to find ways to adopt to more contemporary issues the same skill sets that, you know, we had taught differently.

So I think there are a lot of pieces that you could ask about that. Is there a problem? Sure, there's a problem, because we're coming in with many more students who left high schools less academically prepared today than they were 25, 30 years ago. More to be learned today. Students don't necessarily have that.

So yes, I think there's some problems with the learning that's occurring, but I hesitate to make gross generalizations based on one study.

COMMITTEE MEMBER ROTHKOPF: I just would say I used to do, at a different organization, what Susan Traiman did at the Business Roundtable, and I have to say that the employers that I talked to and we talked to at my organization just found that the skills of the students, even graduates of four year colleges was coming out, these writing skills, these

analytical skills and so on, were not there.

I mean I think it's worth all of us sort of seeing whether or not -- I mean I don't know whether that research is the final thing, but you know, we talk about Race to the Top competition.

I'd like to see some money go into determining, you know, what is a way to evaluate student outcomes, and putting some money into that kind of activity, because I think we need to know it if we're going to produce graduates who will go into the workforce and be able to be competitive with the rest of the world.

COMMITTEE MEMBER KEISER: Well, it's good to see three of my accreditors here, and I really appreciate what you've said, and frankly we have 21 accrediting agencies that we deal with. So along with Mr. Greenberg, I'm a younger junkie of accreditation.

This is directed to Mr. Harvison. One of the things that I hear and we heard today a number of times, that the specialized accreditors are kind of a guild process, where they create a market or limit

the market for folks to enter into specific careers, and specifically in the health care fields, and we are an ATOA program.

What do you say by that, and you know, how do you justify the use of specialized accreditation to -- for the public, to understand quality assurance within the program, and it's not just one of keeping certain people out of the industry?

MR. HARVISON: It's not the first time we've heard that guild thrown around. It's pretty frequent. I think first of all, just go back to the current statutes. There's a lot in the statutes about independence of the accrediting body from the professional associations.

The truth of the matter is most of the professional associations, mine, there are 140,000 practitioners in this country. We're not that big. There has to be some interplay between what's happening within the profession and then what's happening within the body that accredits the schools within the profession.

Do we limit access to the profession? No.

I mean look at my own accreditation body at the moment. Within the last three years, I've had 50 new programs come on. That's a 47 percent growth rate in the associate degree programs we offer at the OTA level, because there's a market demand out there at the moment for occupational therapy assistants.

I know my colleagues in similar professions are going through the same growth periods. We are not in any way blocking access to educational programs. Do we have concerns about how these educational programs are going to be able to compete in the marketplace? Is there a need for that many programs? Yes, we have that concern.

We do the best we can through the application process, to look that they've done due diligence when they want to open a new program, that they've got the availability of the -- in our case, we have to do clinical field work. So we're looking to see do they have access to the clinical field work, do they need to do it.

We're trying to protect the students in the process, but we're in no ways blocking access to

the profession. Just one other -- can I make just one quick comment about the speaker before, who said about limiting specialized and professional accreditors, and he made comment to the fact that, you know, should specialized accreditors be out there if they feel that their accreditation isn't necessary to enter the profession?

To me, the problem with that statement is that I'll be honest. In my profession, you need to graduate from an ATOA-accredited program in order to be able to get the certification exam and licensure. But in those programs, and the specialized ones we're talking about, there is no requirement for anybody to be accredited by them.

Yet the professions, the community, the stakeholders have come out and asked for accreditation to be established in those fields for a reason, because of concern about some of the educational programs and the quality of the graduates of those programs.

So you know, it's the market that's driving the existence of those specialized

accreditors, for a need.

COMMITTEE MEMBER KEISER: Well, that kind of brings me back to the question, where you become the gatekeeper for the national certifying exams or the examinations, to enter into a profession. Doesn't that create kind of a limitation and it limits the market, limits the competition for students who want to enter the profession?

MR. HARVISON: I think you have to go back to the history of that. I'm going to use my profession as an example. The national certification exam is run by a separate organization completely. Now there are occupational therapists on there obviously.

They, in the same way that my agency is recognized by the USDE, their agency is recognized by regulatory bodies. One of the requirements of that regulatory body is how do they guarantee that the candidates for their exam have the education they need to do it? They chose to use the accrediting body for educational programs as the gatekeeper for that, the same way that USDE uses us as a gatekeeper

for financial matters related to federal funds.

We happen to be the only accreditor out there, and that happens in a lot of our professions. I mean we're not that big and there really isn't any financial incentive for somebody to come up and create an accreditation body. There really isn't.

CHAIRMAN STAPLES: Larry.

COMMITTEE MEMBER VANDERHOEF: Let's change the subject just a little bit, but Dr. Brittingham, you said in your written -- you reported in your written materials that you have certain workshops that are offered. How long have you offered those? I have just three quickies on that. How long have they been offered?

DR. BRITTINGHAM: We've offered some basic workshops for about 25 years, as nearly as I can tell. We have increased the number of workshops. We have a two-tiered system for training evaluators now. We have a workshop for chairs and personalized training for chairs who can't come. We have a workshop for the fifth year report. So we've added some workshops and beefed up some.

COMMITTEE MEMBER VANDERHOEF: So those are primarily for teams, not for people from the university that are wanting --

DR. BRITTINGHAM: They're both. There's a series for teams and team chairs, and there's a series for institutions.

COMMITTEE MEMBER VANDERHOEF: With regard to the ones for people from institutions, how much do they cost, the workshop?

DR. BRITTINGHAM: I think the self-study workshop is two days. I think it's \$500. That includes hotel room and meals, two lunches a dinner, a breakfast, a social hour. The other workshops are for institutions are free unless we have so many we have to move them to a hotel, and then we charge \$50, I think.

COMMITTEE MEMBER VANDERHOEF: Do you have any notion that an institution might fret about not getting accredited because they don't attend the workshop? I mean not just based on the information they would get there.

DR. BRITTINGHAM: No, because they can

decide how many people they want to bring, and generally institutions bring -- some of them bring seven or eight people. Some of them bring a person or two. So I have not heard that as a concern.

COMMITTEE MEMBER VANDERHOEF: Thank you.

CHAIRMAN STAPLES: Anne?

COMMITTEE MEMBER NEAL: Jean Tatibouet, who is a trustee, wasn't able to come, but I received a copy of her testimony, and she asked first, why in this era of instant telecommunications and global competition are colleges and universities bound to work with one single regional accreditor that has complete authority over its federal eligibility?

I'd like to ask that as well, particularly since Belle, as you've told us, SACS oversees not only the southern states but Dubai and Latin America. That doesn't sound very reasonable to me. Why not give institutions an opportunity to choose, since we want competition in this business, and presumably that might lead to greater quality?

DR. WHEELAN: Because currently, that's the way the structure is in place, and nobody has

asked us to change it. I mean that's really the only reason that we have. I've only been in this position 5-1/2 years, but I've been in this region, in my region for, like I said, 37, and those determinations were made way back in the 50's when the Department and the accreditors got together and decided, you know, how they were going to put things together.

COMMITTEE MEMBER NEAL: But when you asked for your geographic region, you asked for the southern states. You could say I'd like to do it nationally, and then perhaps NACIQI would say great.

DR. WHEELAN: Ms. Neal, you know, I think there's a culture of geography, just like there are cultures within institutions, and I think that there are some institutions that would have, in the New England area, for example, that might feel kind of disconnected to El Paso Community College way out in, you know, the southern part of the state.

Remember now, our organizations started as -- they were by institutions. This was not an agency that came up, you know, any other way. Our institutions started these and put them together, and

so that's where that comfort zone, that collegiality, that organizational structure came from, and that was in place when the Department came and said, you know, we want to partner with you.

It was just limited, and I wasn't there then. I was two years old in '52 when that came along, thank you very much.

(Laughter.)

DR. BRITTINGHAM: In 1885, I was two years old.

(Laughter.)

DR. BRITTINGHAM: I mentioned that we started having these meetings with the state higher education authorities in the New England area, and I think those have been useful to us. New England is the only, maybe the only region in the country where there's a single correct answer, what are the states in New England.

And by getting together with the state authorities, and we've only done it three or four times, but I think we're trying to make sure that our work is complimentary and we're not overlapping each

other; we're not putting additional burdens on the institutions, that we've got a good sort of mini-triad there.

New England's very compact, so we can drive, you know, and that's for us a big bonus.

COMMITTEE MEMBER NEAL: Well, you've raised something I also wanted to ask about, because it's come up on numerous occasions. You all maintain that the cost is really quite minimal, and as I indicated earlier, Shirley Tilghman says as far as she's concerned the cost can be quite prohibitive.

I guess as we continue this discussion, I hope this is something that we might be able to pin down a bit more scientifically, because it does seem to me that this is very much anecdotal and are hearing quite contrary perspectives on what the cost should be.

We heard the students this afternoon talking about the rising cost, and I think we really should be concerned whether or not this process is adding to the cost, and that rather than just simply depending on reactions and personal senses of it,

that we really ought to have a more definitive sense of that.

DR. WHEELAN: I don't disagree with you at all, but I think that there are times when our institutions feel like they have to buy the Rolls Royce version of the assessment program, when we don't mandate that at all. That's an institutional choice.

So some of the costs that are out there are decided by the institution, not by the accreditor. We encourage our institutions, for example, to partner with each other to use some of those systems so that it does indeed reduce costs, but some of them choose not to.

COMMITTEE MEMBER NEAL: One final question for Barbara. You indicated your desire perhaps not to always have to start over again with every new recognition cycle. And I find that a sympathetic idea.

Why not give that opportunity to the institutions, as well? So if you have accredited an institution, let's say it has a clean bill of health.

Why not let it self-certify in the next year, or the following year, rather than having to come back and start all over again with the process?

DR. BRITTINGHAM: That's a great question. You know, starting with us establishing eligibility, and so we do not go back and ask an institution to start from there and establish eligibility. But I think your question actually goes beyond that. And that is, tailoring the experience to where the institution is and making sure that the institution gets value out of it that they don't feel like they're starting over. And I think that is something that we work on.

We try to make visits to institutions. We have a meeting with presidents at the beginning of the process to help them figure out how to get value out of the process. And we do try to work with them.

We tell them that in part because of the federal recognition there are certain things that we're obliged to do, and therefore they are obliged to do that. Everybody has the same set of standards, but within that there are ways that we can work with

institutions, we hope, to make them not feel like they're starting over.

CHAIRMAN STAPLES: Susan?

COMMITTEE MEMBER PHILLIPS: Am I last call?

CHAIRMAN STAPLES: I think you are. We're just about out of time, yes.

COMMITTEE MEMBER PHILLIPS: Okay. Test question. What would you say, and each of you, I'd like to hear from each of you, what would you say are the most important strengths in the accreditation process that exists now that you would want to see retained? What are the most important strengths?

DR. WHEELAN: In the accreditation process, or the recognition process?

COMMITTEE MEMBER PHILLIPS: You can do either.

DR. WHEELAN: I'm not starting.

(Laughter.)

DR. WHEELAN: You can start down on that end there.

MR. WILLIAMS: I believe the most--the greatest strength of it is peer review. The

alternative that no one seems to explore at any great length is a much more bureaucratic process, I think, and one detached from the contemporary kind of ferment of ideas that you get with peers. So I really think that that involvement of peer review is essential to the process.

MR. McCOMIS: So I would piggyback onto that comment, and add the other foundational pieces. And it goes also to Ms. Neal's question about why not have us just kind of self-certify. And that is, through the peer review process the self-evaluation piece of that. That is meant to be a significant and ongoing process, not just one that's done every however many years you have to go through it, but one that is meant to be a part of the institution, part of its culture.

And what the accreditation process essentially would do, if done very well, is just ask those institutions that are doing what they do every single day to simply document it once every X number of years.

So it is that self-evaluation piece,

coupled with the peer review that Roger talked about. And then the opportunity for scalability within that framework; that a one-size-fits-all approach, and this goes to the peer review, is simply untenable because of the vast diversity and the opportunity that that has to stifle innovation.

MR. HARVISON: Seriously, they stole my ideas.

(Laughter.)

MR. HARVISON: I think the other thing I would add is, the current statutes do make it clear that the Secretary must respect the independence of the institutions and the accreditors in making those decisions, and that would definitely add to those first two points that were just added. So we'll just keep piggybacking, but that would be the third one that I would add to those two.

DR. BRITTINGHAM: We at this end of the table are trying to be kind by letting them say these things first.

I think the fact that this adds up to a system of self-regulation, you know, we're going

through the Standards Midcourse Review, listening to the membership, seeing what steps they think are important to take as we describe accreditation as the standards as what a institution of higher education needs to be and do in order to deserve the public trust.

And it has just been fascinating to go around and listen to the next steps, I would say, that the membership is willing to take, believes it's important to take in ratcheting up in terms of disclosure, in terms of looking at student achievement. So I would add that.

MS. WHEELAN: I'll say ditto, ditto, ditto, ditto for all that they have said. But I also think that the exchange of best practices that occurs among the institutions themselves as people come from, you know, one institution to review, to take back those things which creates a strength, you know, at those institutions that may not have even known that that best practice existed before, for example.

The fact that standards are developed, evaluated, and implemented by the peers themselves,

by the institutions. This is not bureaucratic in the sense of I and my staff sit there and say you will do this, you will not do that. This came from--this comes from institutions who work with students, who know what has worked in helping students achieve, what's not worked in doing that, and so the standards are regularly evaluated and revised as a result of new technologies that come in, new ways of doing things, you know, those kinds of things. So that, while the standards themselves may say things the way they're implemented and addressed, you know, are done so because of a free exchange of ideas among colleagues.

CHAIRMAN STAPLES: Thank you very much. We appreciate your time and discussion. We are going to take a break now and come back at five o'clock for our last panel today.

(Whereupon, a short recess was taken.)

CHAIRMAN STAPLES: The 5:05 panel. Thank you very much, and we're going to begin our last panel discussion of the day, "Perspectives From Outside the Box." I want to thank this panel for

joining us today.

You bring a very different world view from your various industries or perspectives, and we're looking forward to hearing that, and I think using that as a check against a lot of the other things we've been talking about and hearing today. So thank you very much for being here.