

**Expert Report
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On Behalf of Gurnick Academy of Medical Arts

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Executive Summary

This report examines the landscape of institutional accreditation in American higher education, with particular emphasis on its implications for dental hygiene programs in California. The analysis reveals significant changes in the regulatory environment that have fundamentally altered the traditional understanding of accreditation standards.

Of paramount importance is the U.S. Department of Education's 2020 regulatory change, which formally eliminated all distinctions between regional and national accreditation. This watershed moment reflected the Department's longstanding position that all institutional accreditors must meet identical federal recognition criteria under 34 CFR Part 602. The terms "regional" and "national" accreditation, while deeply embedded in educational discourse, have never actually appeared in federal regulations.

The current accreditation framework recognizes two primary categories of accreditors: institutional accreditors, which evaluate entire institutions, and programmatic or specialized accreditors, which focus on specific programs. Within this framework, the Accrediting Bureau of Health Education Schools (ABHES) stands as a significant player, recognized by the Secretary of Education for accrediting private postsecondary institutions offering allied health education programs. ABHES's scope encompasses programs leading to certificates, diplomas, and degrees up to the master's level, and currently accredits over 400 institutions and programs. Its recognition by numerous prestigious trade and industry associations, including CODA, underscores its credibility in the field.

This report identifies several concerning inconsistencies in the Dental Hygiene Board of California's (DHBC) current regulatory framework. While the California Code of Regulations makes no distinction between regional and national accreditation, and CODA standards accept both regional and "appropriate national" accrediting agencies, the DHBC's practices, consistent with the language of Business & Professions Code Section 1941(c), appear to favor regional accreditation. This preference exists despite the California Education Code section 94885.5 requiring only institutional accreditation by an agency recognized by the United States Department of Education, with no distinction between types.

Through careful analysis, this report dismantles several persistent misconceptions about accreditation. It challenges the notion of regional accreditation as a “gold standard,” demonstrates that transfer credit restrictions based on accreditation type are institutional choices rather than regulatory requirements, and refutes claims about the absence of nationally accredited programs in California. The report also addresses the false dichotomy between professional and vocational education based on accreditor type.

Given these findings, the report recommends several actions for the DHBC. First, it should revise its existing criteria to recognize all institutional accreditation agencies recognized by the Department. Second, Gurnick Academy should be permitted to proceed with its RDH program application. Finally, the DHBC should petition the legislature to amend BPC Section 1941 to include all Department-recognized institutional accrediting agencies.

This report concludes that maintaining distinctions between regional and national accreditation is not only outdated but potentially harmful to the field. The DHBC’s continued reliance on regional accreditation could have serious consequences, potentially preventing qualified graduates from accessing federal student aid and sitting for licensure examinations. This situation demands prompt attention to align DHBC’s RDH education standards with current federal regulations and best practices in higher education accreditation.

Nationally Recognized Accrediting Agencies

Accreditation is critical in American higher education, as it establishes and verifies quality standards at colleges and universities. While accrediting agencies are private educational associations, they must be formally recognized by the U.S. Department of Education (the Department) under Title 34 CFR Part 602 provisions. This recognition authorizes them to evaluate whether institutions meet the quality standards required for their students to receive federal financial aid under Title IV of the Higher Education Act (HEA).

Under the HEA, the Department recognizes (approves) accrediting agencies that the Secretary of Education (the Secretary) determines to be reliable authorities as to the

quality of education or training provided by institutions of higher education, and the Department publishes a list of nationally recognized accrediting agencies.¹

As defined in 34 CFR Part 600.2, a Nationally Recognized Accrediting Agency is an agency or association that the Secretary recognizes as a reliable authority to determine the quality of education or training offered by an institution or a program offered by an institution.²

Historical Context

The concept of accreditation in the U.S. began in the late 19th and early 20th centuries. The primary goal was to ensure that secondary schools adequately prepared students for college-level work. The first regional accrediting agency, the New England Association of Schools and Colleges (NEASC), was established in 1885. Other regions followed suit, forming their accrediting bodies.

By the early 20th century, seven accrediting agencies serving specific regions of the U.S. had been established. These included, as they are known today, WASC Senior College and University Commission (WSCUC), Accrediting Commission for Community and Junior Colleges (ACCJC), Northwest Commission on Colleges and Universities (NWCCU), Middle States Commission on Higher Education (MSCHE), New England Commission of Higher Education (NECHE), Higher Learning Commission (HLC), and Southern Association of Colleges and Schools Commission on Colleges (SACSCOC).

These institutional accrediting agencies laid the groundwork for the formal recognition process by the Department in 1952 via the Veterans Readjustment Assistance Act of 1952.³ The accreditation system helped ensure a basic level of quality across educational institutions and provided a framework for continuous improvement and accountability in higher education.

¹ 34 Code of Federal Regulation (CFR) Part 602 and Section 496 of the Higher Education Act (HEA), as amended.

² [eCFR :: 34 CFR Part 600 -- Institutional Eligibility Under the Higher Education Act of 1965, as Amended](#)

³ The Journal of Higher Education, The Federal Connection for Accreditation, 1979, J. Proffitt, pp. 145-157

The Higher Education Act of 1965, the HEA amendments of 1972, and the 1965 National Vocational Student Loan Insurance Act expanded federal funding to all students and business and trade schools. Career-related accreditors emerged, having a national scope and accrediting mainly proprietary, career-based, single-purpose institutions, both degree and non-degree.⁴

Types of Accreditation

The Department recognizes different categories of accreditors based on their scope and role. These agencies fall into two main categories: institutional accreditors and programmatic, or specialized, accreditors. Institutional accreditors have the principal purpose of evaluating institutions of higher education rather than individual programs, and that accreditation is used to participate in federal student aid programs. In fact, institutional accreditors cannot accredit programs. Historically, institutional accreditors have been classified by those serving specific geographic areas and those typically focusing on professional or vocational institutions.⁵ It is important to note that “regional accreditation” and “national accreditation” have never appeared in federal regulations and are concepts educators and administrators use.

Programmatic accreditors operate nationally and review and evaluate programs, departments, or schools within institutions and single-purpose institutions. These agencies perform accrediting activities in their respective fields of study, maintaining expert program evaluators, specialized curricular standards, and emphasizing student and professional achievement. Some accreditors, like the Accrediting Bureau of Health Education Schools (ABHES), perform institutional and programmatic accrediting activities and maintain separate distinctions for their members.

Institutional Accreditation in California

The University of California (UC), California State University (CSU), and the California Community Colleges (CCC) system campuses began receiving grants of accreditation from the Western College Association (WCA), the predecessor to WSCUC

⁴ Council for Higher Education Accreditation, An Overview of U.S. Accreditation, 2015, J. Eaton, p. 2

⁵ [College Accreditation in the United States-- Pg 2 | U.S. Department of Education](#)

and ACCJC, in the 1950's and 1960's. At that time, WCA was the only institutional accrediting agency whose scope included California, and therefore, the only option for accreditation for these Institutions of Higher Education (IHE). In 1962, WCA split into two higher education commissions, WSCUC for senior colleges and ACCJC for junior colleges. The UC and CSU systems remain accredited by WSCUC and the CCC by ACCJC.

2020 Regulatory Changes in Accreditation

In 2019, the Department implemented significant changes to accreditation regulations through a comprehensive negotiated rulemaking process. Effective July 1, 2020, these changes formally eliminated all regional and national accreditation distinctions. As communicated to State Leaders on February 26, 2020 (Exhibit 1 - USDE Letter), since the Department "holds all accrediting agencies to the same standards, distinctions between regional and national accrediting agencies are unfounded."

This regulatory change reflected the fact that the Department has *never* maintained different recognition standards for institutional accreditors. Regardless of their historical categorization, all institutional accreditors must meet identical federal recognition criteria under 34 CFR Part 602, follow the same application procedures, undergo the same review process, and demonstrate the same types of evidence to ensure quality.

The final regulations, released on November 1, 2019, were developed by a diverse negotiated rulemaking panel, including Presidents from three historically regional accreditors (WSCUC, MSCHE, and NECHE) and the Council for Higher Education Accreditation (CHEA). These negotiators and others reached a consensus in April 2019, removing the regional and national distinctions and reaffirming that the Department has always recognized all institutional accreditors as "nationally recognized accrediting agencies."

While historical reputational differences may persist between institutional accreditors, these distinctions are based on tradition and perception rather than regulatory reality or quality differences. The focus has shifted toward institutional quality

and student outcomes regardless of accreditor type. This evolution reflects the modernization of accreditation to serve higher education better while maintaining rigorous standards for institutional quality.

In fact, following the 2020 changes in federal regulation, all historically regional accrediting agencies proceeded expeditiously in petitioning the Department and receiving approval from the Secretary to modify their scope as nationally recognized accreditors, including WSCUC and ACCJC.⁶

WASC Senior College and University Commission

WSCUC petitioned the Department to change its scope as recognized by the Secretary from its historically regional foundation in California, Hawaii, and Guam to performing accrediting activities “...throughout the United States.”⁷ Once approved, It also modified its website to state, “WSCUC is proud of the diverse missions and characteristics of the public and private higher education institutions it accredits *in the United States and around the world* [emphasis added].”⁸

WASC Accrediting Commission for Community and Junior Colleges

Similarly, ACCJC also sought and received approval from the Department soon after the 2020 regulatory changes to perform accrediting activities throughout the U.S. It described its new nationally recognized scope on its website as follows: “ACCJC accredits institutions *in the United States* [emphasis added], its territories and affiliates, with a primary mission of granting associate degrees; institutions accredited by ACCJC may also award certificates and other credentials, including bachelor’s degrees, if those credentials are within the institution’s mission and authorized by their governmental authorities. ACCJC may also accredit non-domestic institutions, which have as a primary mission, the granting of associate degrees.”⁹

⁶ [College Accreditation in the United States-- Pg 3 | U.S. Department of Education](#)

⁷ [College Accreditation in the United States-- Pg 3 | U.S. Department of Education](#)

⁸ [About WSCUC Accreditation](#)

⁹ [About Us - ACCJC](#)

Accrediting Bureau of Health Education Schools (ABHES)

The Secretary recognizes Accrediting Bureau of Health Education Schools (ABHES) for the accreditation of private, postsecondary institutions in the United States offering predominantly allied health education programs leading to a certificate, diploma, and degrees at the level of the Associate of Applied Science, Associate of Occupational Science, Academic Associate, Baccalaureate and Master's; and the programmatic accreditation of medical assisting, medical laboratory technology, and surgical technology programs, through the Associate degree, including those offered via distance education. ABHES members include public and private institutions and programs offering certificates and degrees up to the master's degree level. ABHES accreditation is recognized by many prestigious trade and industry associations, state agencies, and national boards, including but not limited to the Commission on Dental Accreditation (CODA), American Association of Medical Assistants (AAMA), American Medical Technologists (AMT), Accreditation Commission for Education in Nursing (ACEN), The National Board of Surgical Technology and Surgical Assisting (NBSTSA), The American Registry of Radiologic Technologists (ARRT), Texas Higher Education Coordinating Board (THECB), and the Pharmacy Technician Certification Board (PTCB).¹⁰

The agency accredits over 400 institutions and programs¹¹ across different health disciplines, including Fortis College (campuses in MD, GA, AL), Pima Medical Institute (campuses in NM, WA, TX), and MedQuest College (campuses in KY) that provide CODA-accredited programs in Dental Hygiene - Associate of Science and Associate of Applied Science Degrees.

The agency codified Dental Assisting (DA) I and II Program-Specific standards in April 2010 and implemented the standards on July 1, 2010.¹² These standards bear some similarities to the CODA standards for Dental Hygiene, which require program content for basic science courses, clinical skills, and patient care. Regarding percentage overlap, the

¹⁰ [About Us | \(abhes.org\)](http://abhes.org)

¹¹ [Accrediting Bureau of Health Education Schools | CHEA](#)

¹² [Final Dental Assisting Program-Specific Standards | \(abhes.org\)](#)

foundational science courses and basic clinical skills in DA I and II might account for around 30-50% of the Dental Hygiene curriculum.

Dental Hygiene Board of California (DHBC)

As outlined in the DHBC Laws and Regulations, the Board is governed by several regulatory frameworks, none of which are accreditation authorities. In reviewing the multitude of accreditation references in these frameworks, I found inconsistencies and potential compliance issues that warrant the DHBC's attention. These concerns primarily arise from the interaction between state regulations, frameworks, and recent changes in federal education policy.

California Code of Regulations

Title 16, Division 11, Sections 1100 – 1153 of the CCR contain the regulations for the DHBC and make no distinction between regional and national accreditation, even though multiple sections, including 1105 (Requirements for RDH Educational Programs) and 1105.1 (Faculty), mandate the need for institutional accreditation. Specifically, sections 1105(f)(1)(A), 1105.1(a)(2), and 1105.1(b) describe institutional accreditation requirements as "...an agency recognized by the U.S. Department of Education or Council for Higher Education Accreditation."¹³¹⁴

Section 1103(c) defines approved accreditation standards as "...those standards issued by the Commission on Dental Accreditation (CODA) in Business and Professions Code (BPC) section 1941.5."¹⁵ BPC Section 1941.5, which also relies exclusively on CODA programmatic accreditation as the educational and compliance standard for RDH programs, does not reference regional or national accreditation.¹⁶

Commission on Dental Accreditation

CODA is a programmatic accreditor and was approved by the Secretary as a nationally recognized accrediting agency for dental and dental-related education

¹³ [16 CCR § 1105](#)

¹⁴ [16 CCR § 1105.1](#)

¹⁵ [16 CCR § 1103](#)

¹⁶ [BPC § 1941.5](#)

programs in 1952.¹⁷ It performs accrediting activities throughout the United States. Its accreditation standards for allied dental education programs, including dental hygiene, mandate that the program "...must be sponsored by institutions of higher education that are accredited by an institutional accrediting agency (i.e. a regional or appropriate* national accrediting agency) recognized by the United States Department of Education offering college-level programs."¹⁸ The CODA policy manual provides examples of evidence to demonstrate compliance, including institutional accreditation from the Accrediting Bureau of Health Education Schools (ABHES).

While the CCR and BPC rely heavily and exclusively on CODA's programmatic standards for Registered Dental Hygiene (RDH) programs, CODA itself adheres to and relies on the Department's regulations and institutional accreditors that are nationally recognized by the Secretary, making no distinction between regional and national accreditation.

California Education Code

The California Education Code (CEC) establishes the Bureau for Private Postsecondary Education (BPPE) framework. Section 94885.1 of the California Private Postsecondary Education Act requires degree-granting institutions approved by the BPPE to be institutionally accredited by an agency recognized by the Secretary. The CEC makes no distinction between regional and national accreditation.

The BPPE oversees private postsecondary educational institutions operating in California and promotes and implements licensing standards for institutions by conducting workshops and approving or denying applications. The BPPE also reviews institutions through qualitative review of licensing applications and approves and monitors accreditation plans.¹⁹

Four institutions, Carrington College, West Coast University, San Joaquin Valley College, and Concorde Career College, have both BPPE and DHBC approval. The BPPE also licenses Gurnick Academy of Medical Arts, aka Gurnick Academy.

¹⁷ [College Accreditation in the United States-- Pg 4 | U.S. Department of Education](#)

¹⁸ [CODA Dental Hygiene Accreditation Standards p. 15.](#)

¹⁹ [Schools - Bureau for Private Postsecondary Education](#)

Title IV of the Higher Education Act

Title IV of the HEA sets forth three requirements to ensure program integrity in postsecondary education, known as the program integrity triad. The triad includes state authorization to operate, institutional accreditation by an accrediting agency recognized by the Secretary, and approval by the Department to participate in the Federal Student Aid programs, including PELL and student loans. The triad is intended to provide checks and balances for Title IV eligibility requirements. The state's role is to provide consumer protection, the accreditor affirms quality assurance through continuous improvement, and the Department enforces administrative and fiscal integrity of Title IV programs at IHEs.

All IHEs must successfully navigate the triad to participate in Title IV programs. No state requires regional accreditation, institutional accreditors are no longer regional, and the Department removed any reference or distinction to regional accreditation. Thus, there is no distinction between regional or national accreditation across the triad.

Moreover, 34 CFR 668.14(b)(32), which took effect on July 1, 2024, requires IHEs to ensure that their programs satisfy state educational requirements for professional licensure or certification in states where students intend to seek employment. The regulation also mandates that students must be able to qualify for any necessary licensure or certification examinations upon program completion.

DHBC's Continued Reliance on Regional Accreditation

The DHBC's continued reliance on regional accreditation leaves the Board and its new and renewing RDH programs vulnerable as it is inconsistent with the CCR, CEC, and the Department's regulations, as well as the accrediting scope and standards of CODA and all institutional accreditors including WSCUC and ACCJC, the primary accreditors for the Board's RDH programs.

As outlined, regional accreditation is a perception and is not recognized by state or federal regulations. If not addressed expeditiously, these inconsistencies may prevent qualified graduates from DHBC-approved programs from being eligible to sit for their licensure examinations or access federal student aid.

Analysis and Rebuttal of Common Misconceptions

During recent Board meetings, including July 19, 2024, several assertions were made that require review, clarification, and correction. Some of the statements reflect common misconceptions and assumptions about nationally recognized accrediting agencies, but others surrounding accreditation standards and practices were incorrect.

Claim 1: Distinction Between Regional and National Accreditation

During the July 19, 2024 Board meeting, Ms. JoAnn Galliano was called upon by Board members to expound on matters involving accreditation. Notably, having been introduced by the Board as a subject matter expert on accreditation, Ms. Galliano quickly pushed back stating, “I don’t know that I’m an expert.”

Ms. Galliano began describing regional accreditation as the “gold standard” and it’s “the highest level of accreditation.” (See, Board meeting minutes). As outlined throughout this report, these comments reflect Ms. Galliano’s opinion and perceptions and are not grounded in CCR, CEC, or the Department’s regulations, before or after the 2020 regulatory changes. Regardless of how institutional accreditation may or may not have been traditionally categorized, the HEA authorizes the Department to formally recognize one standard and one level of institutional accreditation, and those agencies are required to meet the same recognition standards promulgated by the Department. The fact that UC, CSU, and the CCC system campuses obtained their grants of accreditation before 1972 when institutional accreditors operated in regions is irrelevant, and incorrectly associates accreditor type with program quality.

Claim 2: National Accreditation is Typically Restricted to Proprietary Schools

While her statement is not untrue, it’s important to note that many of the largest proprietary schools in the nation are institutionally accredited by one of the original seven accrediting agencies that operated regionally including:

- Academy of the Art University (WSCUC)²⁰
- American University of Health Sciences (WSCUC)²¹

²⁰ [Accreditation | Academy of Art University \(academyart.edu\)](https://www.academyart.edu)

²¹ [AUHS ACCREDITATIONS – American University of Health Sciences](#)

- California Preparatory College (ACCJC)²²
- University of Phoenix (Higher Learning Commission)²³
- DeVry University (Higher Learning Commission)
- Strayer University (Middle States Commission)²⁴
- Walden University (Higher Learning Commission)²⁵
- Grand Canyon University (Higher Learning Commission)²⁶

Moreover, many non-profit IHEs with programs in all disciplines are institutionally accredited by agencies that have always operated nationally, demonstrating that the tax status of an institution is not the most accurate correlation and may represent personal bias.

Claim 3: Transfer Credit Restrictions

Ms. Galliano asserted, “If I’m graduating from a national program, I would not be able to transfer my credits to a UC or a CSU.” Transfer credit acceptance by an IHE is a policy decision, not a state or federal regulatory mandate. Moreover, credit transfers of any type – from any IHE – are infrequent and students are often required to navigate a complex series of ambiguous institutional policies and practices that often involve the need to enroll in credit bearing transfer-related courses and hefty fees.

For example, the two UC institutions offering advanced dental degrees – UCLA School of Dentistry and UCSF School of Dentistry – have transfer policies that make no distinction regarding regional or national accreditation:

- UCLA’s transfer credit policy focuses on quantity rather than accreditation type, requiring 90 semester units or 135 quarter units, with community college coursework accepted up to 70 semester or 105 quarter units. Their only specific restriction relates to online classes, which are not accepted.²⁷
- UCSF’s policy similarly emphasizes credit quantity, requiring 139 quarter units or 93 semester units from accredited U.S. or English-speaking Canadian institutions.

²² [CPC | Accreditation \(calprepcollege.com\)](http://calprepcollege.com)

²³ [Accreditation | University of Phoenix](#)

²⁴ [Accredited Online College Degrees | Strayer University](#)

²⁵ [Accreditation | Walden University](#)

²⁶ [Accreditation - Fully Accredited Since 1968 | GCU](#)

²⁷ [Prerequisites for Admission | UCLA Dentistry](#)

They allow up to 96 quarter units or 64 semester units from community colleges, with a minimum of 43 quarter units or 29 semester units from four-year institutions.²⁸

While I could find no CSUs offering advanced degrees in dentistry or dental hygiene, a review of allied health programs at two representative institutions reveals inclusive transfer credit policies:

- CSU East Bay explicitly accepts credits from both regional and national accrediting agencies, with final authority delegated to each university campus.²⁹
- CSU Los Angeles accepts college-level credits from both regionally and non-regionally accredited institutions through their standard transfer process.³⁰

Private universities in California that offer dental programs also maintain transfer credit policies that include all accreditation types. This pattern further demonstrates the broader institutional approach to transfer credits in dental education:

- Herman Ostrow School of Dentistry at USC requires prerequisite coursework from any accredited college or university in the United States or Canada, making no distinction between national and regional accreditation.³¹
- Western University of Health Sciences College of Dental Medicine similarly requires only that prerequisite courses be completed with a grade of “C” or better at an accredited college or university, with no preference specified for accreditation type.³²
- Chabot College Dental Hygiene Program permits transfer credit of elective credits from Unitek College, which is institutionally accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC).³³

²⁸ [DDS Admissions Prerequisites | School of Dentistry](#)

²⁹ [Transfer Students - CSU East Bay - Modern Campus Catalog™](#)

³⁰ [Transfer Credit Process | Cal State LA](#)

³¹ [Doctor of Dental Surgery DDS - Herman Ostrow School of Dentistry of USC](#)

³² [College of Dental Medicine](#)

³³ <https://www.chabotcollege.edu/nursing/docs/nursing-equivalency-chart.pdf>

These policies align with the approach taken by the UC and CSU systems, demonstrating that California's IHEs focus more on course completion and academic performance rather than accreditation types or categories.

Claim 4: Nationally Accredited Programs Don't Exist in California

Ms. Galliano's statement that nationally accredited programs don't exist in California is demonstrably incorrect. In the context of RDH programs, Concorde Career College has enjoyed approval from the Board for more than a decade. Beyond RDH programs in the State, there exist many institutions and programs in California that are institutionally accredited by agencies that operate nationally, including the American Career College, California Career College, California Career Institute, Marsha Fuerst School of Nursing, United Nursing College, Unitek College, Xavier College, California Nurses Educational Institute, Contra Costa Medical Career College, Institute of Technology, National Career College, Northern California Nursing Academy, Regan Career Institute, Stanbridge University, Summit College, Angeles College, Arizona College of Nursing, CNI College, all of whom are approved by the California Board of Registered Nursing and/or the California Board of Vocational Nursing and Psychiatric Technicians and most are institutionally accredited by ABHES.

Claim 5: Professional vs. Vocational Education

Ms. Galliano's statement "all the UC's, CSU's and California community colleges are only regionally accredited they because again like I said it's in California it's been considered the gold standard is much more stringent the accreditation requirements for a regional accrediting agency in California is much more stringent and seen as the way to distinguish between a professional program and a vocational education program," reflects a misunderstanding of institutional accreditation.

Foremost, all institutional accreditors must meet identical federal recognition criteria under 34 CFR Part 602, follow the same application procedures, undergo the same review process, and demonstrate the same types of evidence to ensure quality.

Secondarily, ACCJC's scope is the accreditation and pre-accreditation (otherwise known as a candidate for accreditation), of community and other colleges, which have a

primary mission, granting of associate degrees, but which may also award certificates and other vocational credentials, not to exceed the bachelor degree level, where the provision of such credentials is within the institution's mission. During the August 2024 NACIQI meeting, the Executive Director of ACCJC, Dr. Mac Powell, indicated his member institutions awarded 105,000 certificates. Additionally, during this meeting, it was noted that 74 ACCJC institutions are in the lowest quintile of graduation rates, and 49 are in the next lowest quintile. With one institution, Jaffe College, on their college scorecard graduation rate was 28 percent. In response to this comment, Dr. Powell ACCJC indicated, "Not that many of our students really go into a program expecting to graduate with an associate's degree. They go perhaps to a certificate, perhaps to gain some additional credentials, perhaps to level up in workforce, so you know, the idea of a, you know, two year IPEDS graduation rate for people that are first time, full time, or even Title IV eligible, doesn't necessarily align with the students that we see in many of our institutions." Exhibit 2 – ACCJC NACIQI Transcript

Similarly, WSCUC institutional accreditation includes nondegree programs. In July 2016, WSCUC adjusted its definition of educational programs, and therefore its Substantive Change procedures for the review of new non-degree programs. This procedural adjustment was made to ensure that WSCUC conforms with the expectations of the Department, which defines "educational program" to include both degree and non-degree programs. WSCUC defines an "educational program" as a program of courses carrying academic credit leading to a credential (degree, diploma, certificate, etc.). Each institution will continue to determine its procedures for the awarding of academic credit and which courses or programs carry academic credit. Exhibit 3 – WSCUC Adjustment of "Educational Program" Definition.

Claim 6: Programmatic Accreditation Sufficiency

Public commenter Mr. Micah Young asserted that programmatic accreditation with CODA alone could previously provide Title IV eligibility, which is incorrect. CODA is not recognized by the Department as an institutional accreditor, nor a Title IV gatekeeper.³⁴

³⁴ **Title IV Note:** Accreditation by this agency does not enable the entities it accredits to establish eligibility to participate in Title IV programs. [DAPIP | Agency List](#)

The Benefits of ABHES' Institutional and Programmatic Accreditation

The DHBC should consider revising existing BPC criteria for approval by the legislature to recognize the validity and reliability of all institutional accreditation agencies recognized by the Department, such as ABHES, which has been recognized since 1969. ABHES maintains rigorous quality assurance and student achievement measures that align with DHBC criteria. ABHES maintains institutional and programmatic standards that set brightline thresholds for retention, placement, and national licensure passage rates.

Through its annual review process, ABHES monitors enrollment growth and outcomes, requiring members to demonstrate their continuous ability to maintain compliance with the standards.

More importantly, the consumer protection measures within the ABHES standards are evident in the licensure rates and job placement statistics of RDH programs at ABHES-accredited institutions. For example, Fortis College's Associate of Science in Dental Hygiene program in Maryland boasts a 100% pass rate on the National Dental Hygiene Board Exam for 2022-2023 and a 70% job placement rate.³⁵ Similarly, PIMA Medical Institute's RDH programs demonstrate similar outcomes, with job placement rates ranging from 79% to 94% and 100% pass rates on the National Dental Hygiene Board Exam for the 2022-2023 academic year.

In contrast, some ACCJC-accredited RDH programs lag in providing transparent, up-to-date information about their program outcomes. For example, Sacramento City College still has not recorded "employment in a dental office or continuing education (6 months post-graduation and 1-year post-graduation) for cohorts from 2019 to the present."³⁶ They have also failed to report 1st and 2nd attempts National Dental Hygiene Board Exam pass rates for the 2020-2023 cohorts. Similarly, Southwestern College has not reported National Dental Hygiene Board Exam pass rates since 2019 on its program website.³⁷

³⁵ [Landover Placement Rate.pdf](#)

³⁶ [Dental Hygiene | Sacramento City College](#)

³⁷ [Examinations for Licensing](#)

Given the demonstrated success of ABHES-accredited programs and the stringent standards in place, and in light of the full contents of this Report, the DHBC should allow Gurnick Academy to proceed with its application for DHBC approval for its new RDH program. Specifically, the DHBC should interpret Section 1941 in the most reasonable and practical way, which is that an institution that is accredited by an agency recognized by the Department satisfies the accreditation requirements of that section. DHBC should also petition the legislature to amend BPC Section 1941 to include all institutional accrediting agencies recognized by the Department. By doing so, the Board can ensure that prospective students have access to high-quality programs that meet rigorous standards and prepare graduates for successful careers in the dental hygiene field.

Exhibit 1



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF THE UNDER SECRETARY

February 26, 2020

Re: FINAL ACCREDITATION AND STATE AUTHORIZATION REGULATIONS

Dear State Leaders:

This letter is to inform you that the U.S. Department of Education (Department) has published final regulations relating to the accreditation of institutions of higher education, as well as State authorization requirements for distance education, which may have an impact on your State.

The final regulations published this year were developed by a diverse negotiated rulemaking panel, which reached consensus in April 2019.¹ The Department published a Notice of Proposed Rule Making based on the consensus language, and received approximately 200 comments from the public regarding the proposed regulations. The Department responded to those comments, as appropriate, in the final regulation. With the exception of a few provisions relating to the recognition of accrediting agencies, which will take effect on January 1, 2021 and July 1, 2021, the accreditation and State authorization regulations will take effect on July 1, 2020.²

Below we highlight several key provisions of the final regulation that could have an impact on States. We are providing this notification to help you plan appropriately.

Regional versus National Accreditation

The Department is aware that some States have enacted laws and policies that treat institutions and the students who attend them differently based solely on whether the institution is accredited by a “national” accrediting agency or a “regional” accrediting agency. For example, some States limit opportunities to sit for occupational licensing exams to students who have completed a program at a regionally accredited institution. In other instances, transfer of credit determinations at public institutions, and other benefits provided by States, are limited to students who attended regionally accredited institutions.

Because the Department holds all accrediting agencies to the same standards, distinctions between regional and national accrediting agencies are unfounded. Moreover, we have determined that most regional accreditors operate well outside of their historic geographic borders, primarily through the accreditation of branch campuses and additional locations. As a result, our new regulations have removed geography from an accrediting agency’s scope.³ Instead of distinguishing between regional and national accrediting agencies, the Department will distinguish only between institutional and programmatic accrediting agencies. The Department will no longer use the terms “regional” or “national” to refer to an accrediting agency.

¹ 84 FR 58834

² The new regulations delay implementation of changes to the Department staff’s review of accrediting agency applications for initial or renewal of recognition under 34 C.F.R. § 602.32(d) until January 1, 2021. See 84 FR 58927. The new regulations also delay implementation of changes to the Department staff’s process for responding to accrediting agency applications and allowing agency responses within 180 days under 34 C.F.R. § 602.32(h) until July 1, 2021. See 84 FR 58928.

³ See 84 FR 58917-58918 (amending 34 C.F.R. §§ 602.3, 602.11).

Because the Department will no longer distinguish between “regional” and “national” accrediting agencies, we wanted to provide States with advanced notice of this change so that State leaders will have sufficient opportunity to adjust State laws, regulations, or policies accordingly.

State Authorization

The Department’s revised Accreditation and State Authorization regulations also make changes to State authorization requirements.⁴ For example, in order for a distance education provider to serve students in a State other than the one in which the institution has a physical presence, either the State in which the institution is located or the State in which the student is located must have a process in place to receive and review student complaints.⁵ We encourage all States to implement the appropriate policies and processes to accept, investigate, and respond to student complaints.

In addition, because it is important for all students – and not just those who enroll in distance education – to understand whether the program in which they are enrolled will qualify them to work in certain occupations in a given State, the revised regulations require both ground-based and online programs to notify students whether the program will or will not meet licensure requirements in a particular State, or in the event that the institution has not made that determination, where a student may obtain that information.⁶

The revised regulations continue to recognize State reciprocity agreements, such that an institution participating in a State reciprocity agreement will have satisfied the Department’s State authorization requirements in any State that also participates in the reciprocity agreement.⁷ In response to public comments, the Department provided further clarity that, while States participating in a State authorization reciprocity agreement may still enforce their own general-purpose State laws and regulations outside of the State authorization of distance education, States participating in a reciprocity agreement may not impose additional distance education regulations or requirements upon institutions that participate in such agreements.⁸

The Department of Education has developed informational webinars to help States, institutions of higher education, and accreditors understand what is required of them under our new regulations. The webinars are located on the Department’s website at <https://www2.ed.gov/policy/highered/reg/hearulemaking/2018/index.html>.

Should you have any questions, please feel free to contact the Accreditation Group at the Department of Education at aslrecordsmanager@ed.gov or 202-453-7615.

Sincerely,



Diane Auer Jones
Principal Deputy Under Secretary
Delegated the Duties of Under Secretary

⁴ See generally 84 FR 58914-58915 (amending 34 C.F.R. § 600.2); 84 FR 58915-58916 (amending 34 C.F.R. § 600.9).

⁵ See 84 FR 58915 (amending 34 C.F.R. § 600.9(c)). See 84 FR 58845-58846 (comments and discussion).

⁶ See 84 FR 58932 (amending 34 C.F.R. § 668.43(a)(5)).

⁷ See 34 C.F.R. § 600.9(c)(1)(ii).

⁸ See 84 FR 58841-58842, 58914-58915 (amending 34 C.F.R. § 600.2).

Exhibit 2

U.S. DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION
NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND
INTEGRITY
(NACIQI)

WEDNESDAY, AUGUST 7, 2024

The Advisory Committee met at 9:00 a.m.

NACIQI Members:

Kathleen Alioto
Roslyn Artis
Jennifer Blum
Wallace Boston
Deborah Cochrane
José Luis Cruz Rivera
Keith Curry
David Eubanks
Molly Hall-Martin
Arthur Keiser
D. Michael Lindsay
Robert Mayes
Mary Ellen Petrisko
Michael Poliakoff
Claude Pressnell, Jr.
Robert Shireman
Zakiya Smith Ellis

Department of Education Staff:

Herman Bounds
Laco L.G. Corder
Elizabeth Daggett
Paul Florek
Antoinette Flores
Monica Freeman
Brian Fu
Nicole Harris
Charity Helton
Donna Mangold
Stephanie McKissic
Nasser Paydar
Scott Prince
Reha Mallory Shackelford
Christle Sheppard Southall
Angela Sierra
Karmon Simms-Coates
George Alan Smith
Mike Stein

Monica Yassa

Tyla Chase, Intern

RENEWAL OF RECOGNITION:

NATIONAL ASSOCIATION OF SCHOOLS OF THEATRE, COMISSION ON
ACCREDITATION (NAST)

NACIQI PRIMARY READERS:

ZAKIYA SMITH ELLIS

JENNIFER BLUM

DEPARTMENT STAFF:

KARMON SIMMS-COATES

AGENCY REPRESENTATIVES:

KAREN P. MOYNAHAN, EXECUTIVE DIRECTOR

RICHARD F. MANN, LEGAL COUNSEL, KELLER AND HECKMAN, LLP

THIRD-PARY COMMENTERS: NONE

RENEWAL OF RECOGNITION:

COUNCIL OF EDUCATION FOR PUBLIC HEALTH (CEPH)

NACIQI PRIMARY READERS:

ARTHUR KEISER

DEBBIE COCHRANE

DEPARTMENT STAFF:

ELIZABETH DAGGETT

AGENCY REPRESENTATIVES:

LAURA RASAR KING, EdD, MPH, EXECUTIVE DIRECTOR

MOLLIE MULVANTITY, MPH, CAE, DEPUTY DIRECTOR

SHARONDA WALLACE, PhD, MPH RDH, DEAN, MPH DEGREE PROGRAM,
CHAMBERLINE UNIVERSITY

THIRD-PARTY COMMENTER: NONE

RENEWAL OF RECOGNITION:

NEW YORK STATE BOARD OF REGENTS, NURSING

EDUCATION (NYBRN)

NACIQI PRIMARY READERS:

MOLLY HALL MARTIN

MICHAEL POLIAKOFF

DEPARTMENT STAFF:

PAUL FLOREK

AGENCY REPRESENTATIVE:

JEANNE-MARIE HAVENER, ACCREDITATION

COORDINATOR FOR NURSING EDUCATION PROGRAMS

THIRD PARTY COMMENTERS: NONE

RENEWAL OF RECOGNITION:

MARYLAND STATE BOARD OF NURSING (MDBN)

NACIQI PRIMARY READERS:

KATHLEEN ALIOTO

ARTHUR KEISER

DEPARTMENT STAFF:

NICOLE S. HARRIS

AGENCY REPRESENTATIVES:

RHONDA SCOTT, EXECUTIVE DIRECTOR

DR. CAMILLE FORBES-SCOTT, DEPUTY DIRECTOR

MICHAEL CONTI, BOARD COUNSEL

DR. SHEILA GREEN, LEAD EDUCATION CONSULTANT

THIRD PARTY COMMENTERS: NONE

RENEWAL OF RECOGNITION:

ACCREDITING COMMISSION FOR COMMUNITY AND

JUNIOR COLLEGES (ACCJC)

NACIQI PRIMARY READERS:

WALLACE BOSTON

MARY ELLEN PETRISKO

DEPARTMENT STAFF:

MIKE STEIN

AGENCY REPRESENTATIVES:

MAC POWELL, MBA, PHD, PRESIDENT

LORI GASKIN, PHD, COMMISSIONER, PAST CHAIR

GOHAR MOMJIAN, EDD, VICE PRESIDENT

THIRD PARTY COMMENTERS:

DR. ARDIS ESCHENBERG, CHANCELLOR, WINWARD

COMMUNITY COLLEGE

DR. RYAN CORNNER SUPERINTENDENT/PRESIDENT,

GLENDALE COMMUNITY COLLEGE

DR. JOHN HETTS, EXECUTIVE VICE CHANCELLOR, AT

CALIFORNIA COMMUNITY COLLEGE

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PROCEEDINGS

9:00 a.m.

WELCOME AND INTRODUCTIONS

G. SMITH: Good morning, and welcome to the second day of the Summer 2024 meeting of the National Advisory Committee on Institutional Quality and Integrity, also known as NACIQI. I'm George Alan Smith, the Executive Director and Designated Federal Official of NACIQI.

NACIQI was established by Section 114 of the Higher Education Act of 1965, as amended, or HEA, and is also governed by provisions of the Federal Advisory Committee Act as amended, which sets forth standards for the formation and use of advisory committees.

Sections 101(c) and 487(c)-4 of the HEA and Section 8016 of the Public Health Service Act, 42 U.S.C. Section 2966, requires the Secretary to publish a list of state approval agencies, nationally recognized accrediting agencies, and state approval and accrediting agencies for programs of nurse education that the Secretary determines to be reliable authorities as to the quality of education provided by institutions and programs they accredit.

Eligibility of the educational institutions and

programs for participating in various federal programs requires accreditation by an agency listed by the Secretary. As provided in HEA Section 114, NACIQI advises the Secretary in the discharge of these functions, and is also authorized to provide advice regarding the process of eligibility and certification of institutions of higher education for participation in the federal student aid programs, authorized under Title IV of the HEA.

In addition to these charges, NACIQI authorizes academic graduate degrees from federal agencies and institutions. This authorization was provided by letter from the Office of Management and Budget in 1954, and is available on the NACIQI website, along with 2011 guidance, and all other records related to NACIQI's deliberations.

Thank you for joining us today for this virtual meeting. I'll now turn the meeting over NACIQI Chairperson, Claude Pressnell.

CHAIRMAN PRESSNELL: Thank you, George, and welcome to everybody. I appreciate you joining us for day two of the NACIQI meetings, Committee meetings, and what I'd like to do now is introduce the Committee members, and so Committee members, please make sure you have your video on, so that I can recognize you in the introductions.

I am Claude Pressnell, currently serve as the Chair of NACIQI, and I'm in the final four weeks in my position as President of the Tennessee Independent Colleges and Universities. As I move myself into retirement, and yes, I can't get rid of this file. I'm thinking about it, it's so important. But let me introduce the Committee members, and I'll call on you, and then if you would introduce yourself that would be great. So, Mary Ellen?

M. PETRISKO: Mary Ellen Petrisko, Past President of the WSCUC Senior College and University Commission, and also very happily retired. Thank you.

CHAIRMAN PRESSNELL: Thank you Mary Ellen. Roslyn?

R. ARTIS: Good morning, Roslyn Clark Artis, President of Benedict College in Columbia, South Carolina.

CHAIRMAN PRESSNELL: Jenn?

J. BLUM: Jennifer Blum with Blum Higher Education Advising, good morning.

CHAIRMAN PRESSNELL: Okay. Debbie?

D. COCHRANE: Debbie Cochrane with California's Bureau for Private Postsecondary Education.

CHAIRMAN PRESSNELL: Molly?

M. HALL-MARTIN: (Speaks in Native Language).

Good morning. Molly Hall-Martin, Regional SARA Director for the Western Interstate Commission for Higher Education, and nowhere near retirement.

CHAIRMAN PRESSNELL: Good for you, and good for us. Wally?

W. BOSTON: Wally Boston, President Emeritus of American Public University System.

CHAIRMAN PRESSNELL: David?

D. EUBANKS: Good morning everyone. I'm David Eubanks with Furman University.

CHAIRMAN PRESSNELL: Robert?

R. MAYES: Good morning. Robert Mayes with the Columbia Southern University down in Orange Beach, Alabama.

CHAIRMAN PRESSNELL: Art?

A. KEISER: Art Keiser, Chancellor Keiser University here in Fort Lauderdale.

CHAIRMAN PRESSNELL: Great, Kathleen?

K. ALIOTO: Kathleen, continuing advocate for community colleges and early childhood education, and I know I should be retiring but I can't.

CHAIRMAN PRESSNELL: Very good, Bob

Shireman?

R. SHIREMAN: Bob Shireman, Senior Fellow at the Century Foundation.

CHAIRMAN PRESSNELL: Michael Poliakoff?

M. POLIAKOFF: Michael Poliakoff, President of the American Council of Trustees Alumni.

CHAIRMAN PRESSNELL: Zakiya?

Z. ELLIS: Hi, Zakiya Smith Ellis with Education Council. I am five-ish months pregnant, so I am constantly eating. If you see that, that's why, just putting this out there.

A. KEISER: Congratulations

CHAIRMAN PRESSNELL: Yeah, congratulations. That's fabulous. Keith?

K. CURRY: Keith Curry, President CEO of Compton College.

CHAIRMAN PRESSNELL: All right, great. That's all the members I can see. I don't know if we have any other members who are on, who have not turned on their video. I know we have some recusals, but if I missed anybody go ahead and speak up now. All right. Great. So, what I would like, Herman, if you could introduce your team, and then followed by George, if you could introduce yours, and have OGC also introduce their

folks. So, we'll start with Herman.

H. BOUNDS: All right. Thank you. Good morning, everyone. My name is Herman Bounds. I'm the Director of the Accreditation Group at the Department, and we'll start first with Monica Yassa?

MS. YASSA: Good morning everyone. Monica Yasso. I'm the ASL Records Manager with the Accreditation Group.

H. BOUNDS: Beth?

E. DAGGETT: Good morning everybody. Elizabeth Daggett, Analyst with the Accreditation Group.

H. BOUNDS: Reha?

R. SHACKELFORD: Good morning everyone. Reha Mallory Shackelford, Analyst with the Accreditation Group.

H. BOUNDS: Nicole?

N. HARRIS: Good morning everyone. Dr. Nicole S. Harris here, Analyst with the Accreditation Group.

H. BOUNDS: All right. Thanks Nicole. Like that smile. Stephanie?

S. MCKISSIC: Good morning everyone. I am Stephanie McKissic, and I'm an Analyst with the Accreditation Group.

H. BOUNDS: Thank you, Stephanie. Charity?

C. HELTON: Good morning. I am Charity Helton.

I am an Analyst at the Accreditation Group.

H. BOUNDS: Karmon?

K. SIMMS-COATES: Good morning. I'm Karmon

Simms-Coates. I'm an Analyst with the Accreditation Group.

H. BOUNDS: All right. Thanks, Karmon. Mike?

M. STEIN: Good morning. Mike Stein, Analyst

with the Accreditation Group.

H. BOUNDS: Thanks, Mike. L.G.?

L. CORDER: Good morning. L.G. Corder,

Analyst with the Accreditation Group.

H. BOUNDS: All right. Thanks, L.G. And Paul?

P. FLOREK: Good morning. Paul Florek, Analyst

with the Accreditation Group.

H. BOUNDS: All right. Thanks, Paul. George?

G. SMITH: Okay. Great. Monica, could you

introduce yourself?

M. FREEMAN: Good morning. I'm Monica

Freeman, Management and Program Analyst with the Office of Postsecondary Education.

G. SMITH: And Angela Sierra, can you introduce

yourself and the rest of the OGC team please?

A. SIERRA: Yes. Good morning. I'm Angela Sierra. I'm an attorney in the Office of the General Counsel at the Department, and with us today from OGC we also have Christle Sheppard Southall.

N. HARRIS: And George, just to FYI, we have Tyler Chase, our summer intern with the Accreditation Group online.

G. SMITH: Thanks, Nicole.

CHAIRMAN PRESSNELL: Yeah, thanks Nicole. I was just going to mention that, you know as well. Poor interns, they just don't get the recognition they deserve sometimes, you know, that's for sure. So again, welcome everybody, and I appreciate all the work that you all had put into the meeting and the Committee members, especially with the work you put in to the agencies upon review.

So, let me just briefly go over the review procedures for the audience, and also for the agencies who are in attendance. At the very beginning we will have the primary NACIQI members, the primary readers, introduce the agency application. Then the Department staff will provide a briefing of the report that they have created as a result of the review.

We do allow the members then to ask clarifying questions to the Department staff's briefing. Then the agency is invited to come and provide comments, followed by questions by NACIQI Committee members, and then if there are third party comments that will be made after the agency is complete. And then the agency is allowed to come back to respond to the third party commenters.

And then finally, the Department staff will respond to the agency and third party comments before the discussion and the vote. So, that's kind of the run of show, and how that goes with each of the agencies. I will remind the members that we didn't make it very far yesterday. We made it right up to where we should have had lunch, where we finished yesterday.

So, we're picking up two agencies from yesterday, and then we've got several agencies to review today, and we'll probably end up rolling a couple into tomorrow as well. Never want to thwart important conversation. The only thing that I ask is that you try to not repeat what's already been said by another Committee member.

Yesterday, quite frequently people would say you know, I know full circle, we're going back to this again, but, and I appreciate that, but it really did take up an enormous amount of

time yesterday. So, just try not to repeat yourselves, and I know the issues are important, so again, I don't want to thwart any type of important conversation, let's just see if we can tighten it up a little bit.

So, that's the nasty role of the Chair is to try to keep the train on time. I totally miserably failed at that yesterday, so we'll see what we can do today.

RENEWAL OF RECOGNITION

ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES (ACCJC)

CHAIRMAN PRESSNELL: All right. Welcome back. We are now going to look at the Accrediting Commission for Community and Junior Colleges, and our Committee Primary Readers are Wally Boston and Mary Ellen Petrisko, and Wally, are you going to introduce the agency to us?

W. BOSTON: Yes I am, Claude.

CHAIRMAN PRESSNELL: Okay. Thank you.

W. BOSTON: Sure. The Accrediting Commission for Community and Junior Colleges, ACCJC, or the agency, is an institutional accreditor. The agency's institution are voluntary members that offer two year educational programs and award primarily associate degrees, but also bachelor's degrees.

The institutions include community colleges, private religious institutions, for profit, and independent nonprofit vocational institutions, and independent junior colleges. The agency has 130 plus accredited member institutions. The member institutions are all located in California, Hawaii and the United States territories of Guam and America Samoa, the Republic of Palau, the Federated States of Micronesia, the Commonwealth of

the Northern Mariana Islands, and the Republic of the Marshall Islands, as well as the State of New York.

The majority of the states' member institutions are in California, and offer at least some courses via distance education. The agency's recognition enables these institutions to establish eligibility to receive federal student assistance funding under Title IV of the Higher Education Act of 1965 as amended.

The agency last appeared before NACIQI in the summer of 2019, and was granted federal recognition for five more years.

CHAIRMAN PRESSNELL: All right. Thank you very much, Wally. So at this point we will introduce, or bring forward the Department staff, Mike Stein, for his review of the report.

M. STEIN: Thank you. Good morning, Mr. Chair, and Committee members. My name is Mike Stein, and I'm providing a summary of the Petition for Renewal of Recognition for the Accrediting Commission for Community and Junior Colleges, also known as ACCJC, or the agency.

I will take just a moment to read their current scope of recognition, as well as their proposed scope of recognition. The current scope is accreditation and pre-accreditation, which they

call candidate for accreditation, of community and other colleges with a primarily pre-baccalaureate recognition.

Located in California, Hawaii, the United States territories of Guam and American Samoa, the Republic of Palau, the Federated States of Micronesia, the Commonwealth of the Northern Mariana Islands, and the Republic of the Marshall Islands, which offers certificates, associate degrees, and the first baccalaureate degree by means of a substantive change review offered by institutions that are already accredited by the agency, and such programs offered via distance education, and correspondence education at these colleges.

Its recognition also extends for the committee for substantive change of the Commission for decisions on substantive changes, and the appeals panel, and as noted, the geographic area that is accrediting activities in the United States.

The proposed scope is the accreditation and pre-accreditation, otherwise known as candidate for accreditation, of community and other colleges, which have a primary mission, granting of associate degrees, but which may also award certificates and other credentials, not to exceed the bachelor degree level, where the provision of such credentials is within the institution's mission.

And if applicable, is authorized by the government authorities in the accreditation of such programs offered via distance education, direct assessment, and correspondence education at these colleges. This recognition also extends to the Committee on Substantive Change of the Commission, for decisions on substantive changes and the appeals panel.

So, the change there is to sort of get rid of their old region mentions, and add direct assessment. The staff recommendation to the Senior Department Official is to continue the agency's recognition as a nationally recognized accrediting agency for five years at this time, and approve the agency's request to include the accreditation of direct assessment programs in its scope of recognition.

The agency has been found compliant with all of the Secretary's criteria for recognition. This recommendation is based on a review of the agency's petition and supporting documentation, as well as observations of two site visits, a Commission meeting, a virtual file review, a training to site team chairs, and a training for peer reviewers.

The Department received no complaints or third party comments regarding the agency since its last review. There are representatives here from the organization. I will be happy to

answer any questions you may have. Thank you.

CHAIRMAN PRESSNELL: Great, thank you, Mike. Any technical questions for Mike? Yeah, David?

D. EUBANKS: Sorry, I couldn't find the handbook.

CHAIRMAN PRESSNELL: That's fine.

D. EUBANKS: Just a quick clarification. How does the Department define direct assessment?

M. STEIN: That is defined in part 668, student assistance general provisions. I think I discussed it in the scope of recognition. I don't have the definition here in front of me, but I can look for it. Yeah.

D. EUBANKS: I can look for it.

CHAIRMAN PRESSNELL: Okay. Bob?

R. SHIREMAN: Yeah, so I think you said that they're authorized. Are they recognized by the Department to offer bachelor's degrees, or is it just that they do bachelor's degrees on top of -- anyway, yeah, what is the Department recognition? Does it extend to the bachelor's?

M. STEIN: It does extend to bachelor degrees with that caveat that it is within the school's mission, and authorized by the appropriate government agency.

R. SHIREMAN: Got it. Thanks.

CHAIRMAN PRESSNELL: Anything else? All right. Great. Then we will bring forth the agency for response to the report, and Dr. Mac Powell.

M. POWELL: Good morning, everyone. I am joined by Lori Gaskin, a former Chair of the Commission, and Dr. Gohar Momjian, Vice President of the Commission. I have some brief remarks, as well as some remarks from Chair Gaskin, and we'll get quickly to your questions.

So, first off I want to thank Mike Stein, Herman Bounds, the entire accreditation staff, as well as the membership of NACIQI for the opportunity to appear before you today. As President of the Accrediting Commission for Community and Junior Colleges, I'm very proud to share the vision and values that drive our organization's commitment to educational excellence and integrity.

Our mission at ACCJC is to ensure the community and junior colleges provide high-quality education that meet the diverse needs of students and society. This mission is underpinned by a set of core values that guide our work, and inspire our actions. Our vision is to be a leader in promoting educational quality and innovation.

We aim to create a landscape where all students

have access to exemplary educational opportunities that prepare them for meaningful careers, informed citizenship, and lifelong learning. To keep this vision, we are dedicated to fostering a culture of continuous improvement, transparency and accountability within the institutions that we accredit.

At the heart of our work is a steadfast commitment to educational excellence. Every student deserves access to high-quality learning experiences, and our accreditation standards are designed to ensure that institutions provide rigorous and relevant education that meets the highest standards of academic quality and integrity.

Further, we are committed to fostering a culture of continuous improvement by providing comprehensive evaluations and ongoing constructive feedback, we help colleges identify areas for growth and improvement strategies for continuous improvement. This iterative process ensures that institutions remain responsive to the evolving needs of students, workforce, and society.

Transparency and accountability are foundational to our processes. Our commitment to transparency ensures that stakeholders have access to critical information about the institutional performance and accreditation outcomes. We are

dedicated to promoting equitable outcomes, and recognize the diverse backgrounds and experiences of our students, and we are committed to ensuring that everyone has access to high-quality education.

Our standards emphasize the importance of equitable practices, and in particular, equitable outcomes. Collaboration and engagement are central to our approach. If accreditation processes are inclusive and participatory, and all the faculty administrators, students and community members that foster a collaborative spirit to enhance the relevance and effectiveness of our work, and strengthen the sense of community within our colleges.

Finally, in a rapidly changing educational landscape we value innovation, and adaptivity. We encourage innovations to explore new approaches to teaching and learning to embrace technological advancements, and to develop innovative solutions to emerging challenges.

Our processes support and recognize innovative practices, enhance educational quality and student success. Briefly, ACCJC is a membership of 136 institutions, primarily serving public two year community colleges, including the California community college system, the largest educational

system in the United States, serving over 2 million students, as well as the community colleges that apply in the Pacific.

Our private institutions are unique. For instance, the Defense Language Institute is a premier language education institution that provides culturally based foreign language education and training for the Department of Defense and other governmental agencies.

Deep Springs College is an exceptional liberal arts college that students often transfer to elite four year institutions. It is located in a remote area of Northeastern California, which offers educational experiences that combine rigorous academics, ranching and farming, and student self-governance.

And finally the Salvation Army Colleges for Officer Training, which provides comprehensive training programs for individuals preparing for service and leadership roles within the Salvation Army, focusing on spiritual formation, practical skills and community engagement.

As we think about the value of education, more than half of our students pay no tuition or fees. In the three examples of private institutions, the students not only receive free education, but also free room and board, and in two of the cases, stipends to attend school.

I'd like to highlight some of the elements of our processes that make us unique. First, our institutions are required to share the disaggregated student achievement data publicly, and to use that data to guide institutional decision making. The data is linked through our website, highlighting a focus on our commitment to transparency.

To my knowledge, we remain the only accreditor that has continually published this disaggregated data, but also makes publicly available the institutional self-evaluations, our team reports, and our Commission action letters. With respect to monitoring, I believe we have one of the most robust fiscal monitoring systems in accreditation.

Our annual fiscal report collects institutions key indicators of fiscal health. It includes three year rolling periods to create a composite financial index. Some of the indices that are used include the primary reserve ratio, net operating reserve ratio, revenues or deficits, salary and benefit percentages, enrollment declines, audit findings, and other financial assessments.

Institutions that score within an at risk category are placed on enhanced monitoring by ACCJC, and allows the monitoring work in conjunction with staff and the Commission to move institutions toward fiscal health. The outcome of these

processes has been a series of institutions that have demonstrated initial, financial challenges to become quickly in compliance with the Commission standards.

The lack of closures due to fiscal concerns is almost entirely attributable to monitoring and institutional engagement.

With respect to additional ongoing monitoring, we annually collect institution's data on headcount or growth, including declines in distance and correspondence education, as well as the institution's performance on their self-set standards, and stretch goals for key indicators of student achievement over a three year period.

These key indicators must include course completion, degree certificate completion, licensing examination passage rate, job placement rates, and transfer to four year institution. We analyze this data and provide a report to the Commission highlighting trends across our membership.

Institutions also provide a narrative analysis in their ongoing reporting, including their mid-term report, and these processes together, allow ACCJC to ensure that colleges are holding themselves accountable to continuous improvement, and with respect to student achievement in the context of their own unique mission.

As you may know, we revise our standards to

streamline our work, and refocus the subject of our institutional self-reflection and team evaluation on what is most critical, the equitable outcomes of our students.

I'm also pleased to share that we are working with the College Futures Foundation, in consultation with the Gates Foundation, and moving the Foundation to consider adding a value metric to our evaluations, highlighting the importance of return on investments as students make critical decisions about their educational workforce trajectories.

We are driven by these shared values and visions of educational excellence, and a commitment to our core values.

Thank you for your continued dedication to educational excellence, and for your partnership in this important work. I'd like to turn the floor over to the former Chair of our Commission, Lori Gaskin, for additional comments.

L. GASKIN: Thank you, Dr. Powell. I wish to first of all express thanks and appreciation to the Committee for the opportunity to provide comments as you consider the renewal of recognition for ACCJC. My name is Lori Gaskin, and I am a Commissioner, and immediate past Chair of the Commission.

And before I start my formal remarks, I just have to say I am extremely proud when I hear Mr. Boston, or Mr. Stein, or

Dr. Powell speak about ACCJC, and the fine work that we're doing in support of our millions of students. It just brings such depth of passion and commitment that is representative of the entire Commission.

So, thank you for that. My comments, my formal comments today center on four key attributes of ACCJC that we, as a Commission, believe advance our mission and vision as articulated by Dr. Powell. And that first attribute is that we are unique amongst higher education accrediting agencies in that our singular focus is two year institutions.

And we are in turn able to tailor our work, our expertise, and our support to this educational sector. The second attribute I wanted to share with you is that we embrace the practice of continuous quality improvement that strengthens ACCJC's effectiveness.

Examples of this include the transformation of our accreditation standards, transitioning to a formative based accreditation process, providing meaningful support to our member institutions through our portfolio structure, and through the effective use of technology, proactively engaging our member institutions and key stakeholders in the relevant aspects of our charge, and other novel practices that speak to our effort to

continuously improve.

The third attribute as a Commission, we practice normed, structured and consistent decision making that has, as its foundation, sound training for our member institutions, and for our Commissioners, rubrics for institutions to utilize, as they prepare for the process, internal checks and balances by the Commission as our deliberations take place, and a reconciliation process at the conclusion of every meeting in which decisions are taken.

And finally, the fourth attribute I wanted to share, our Commission of 19 members is comprised of a diverse assemblage of professionals who possess solid credentials and a strong understanding of and commitment to our mission. Also, a strong understanding of and commitment to the accreditation process, and to the institutional improvement toward the advancement of equitable student outcomes.

Once again, I thank you. Thank you, Dr. Powell.

M. POWELL: Thank you, Lori.

CHAIRMAN PRESSNELL: All right, thank you very much. I appreciate this comment, and so we'll move into questions from our primary readers, and so Wally or Mary Ellen, who would like to start?

W. BOSTON: I'm going to start. Thank you,

Claude. Thank you Dr. Powell, thank you Dr. Gaskin. I commend you on the institutions that you accredit that are focused on affordable education. We certainly need more of those in our country.

I want to start with something that's not in one of the formal sections, but really something that I pulled off of your website. Your website indicates that you consolidate the annual reports and the annual financial reports submitted by members that your dashboards are unavailable to the public.

And I guess I might understand why the fiscal report dashboard, particularly if you're assessing risk, and dealing with that privately, may not be available. But I'm wondering why the annual report, since your institutions are required to publish them anyway, why your consolidated annual report is not published because as you may be aware, we have a dashboard, it's still a work in progress.

I've actually asked Brian Fu, who is the Department liaison for the dashboards to attend this part of the meeting just in case we can pick up some tips. But I'm curious why your dashboard that doesn't have anything to do with financial risk isn't published because I think that would be very useful information. And then secondly, I have some very specific questions, but if you

can answer the first then I'll get to the specific questions on some of our dashboard numbers versus yours.

M. POWELL: That's a great question. I'm actually looking at our dashboard now. So I joined -- some of you may have seen me before, I was at NWCC for many years. When I came here two years ago is when we first started putting all of our data into a singular dashboard, so it's essentially been in a pilot phase.

We've taken out to the membership that we'd like to add a link to our website to make this data public. We've heard only universal acceptance that that is a direction that our membership would like to go in, so I firmly expect that that would be a public, probably next June, so that will be basically our second year of testing it.

And also to align with the idea that we also had a value metric, in addition to what we make public. And as you say, you know, our institutions are already required to publish their audit. They're already required to publish all this information, having it in one place in the dashboard where you can compare and look at institutions I think is incredibly valuable, and given the fact that we've now, you know, looked at this model for about a year, and two, three months. I think it's time for us to go wide with it.

W. BOSTON: Thank you. So, this is a small nit, but our dashboard reports that you have 133 institutions. I think your website indicates 136. I know that there are two new institutions in New York, so do you have a third new institution that I just didn't pick up in any of our write-ups, or your website?

M. POWELL: Let me turn that over to Gohar, because certainly we lost one member with Libby in New York. They were with us only for a very brief period of time, and we have two institutions that are going up for candidacy review right now. Gohar, would you mind taking the question?

G. MOMJIAN: We have 137 institutions. That includes one institution that is currently a candidate, and per our policies and procedures, a candidate in candidacy status, a candidate institution is a member with all the rights and responsibilities that membership provides.

W. BOSTON: Great, okay. Okay, thank you. So, a couple things. Our dashboard indicates that you have a 1,077,051 undergrads. I like the fact that in one of your introductory speeches you talked about the California Community College System has over 2 million students alone.

I think part of our issue is that our data only collects college scorecard data, which only represents people that

participate in financial student aid programs. So, can you tell us what the total number of undergraduates are, since you have these consolidated dashboards in the institutions that you represent are?

M. POWELL: Yeah. At our last annual report we had just about 2.1 million students that are reported to us as what we oversee. But of course, there's a great deal of fluctuation, particularly with the California Community Colleges, so those students move in and out very quickly, but in terms of annual report data, we recognize about 2.1 million students.

I suspect at any given time, given the ins and outs of California it's probably closer to 2.2, 2.3 million students.

W. BOSTON: Okay. And then we also have zero graduates. That could be because of the way our programs are consolidated, none of them are reportable for graduates. Brian may be able to answer that, but I'm curious if your consolidated report says how many graduates you had this past year?

M. POWELL: Well, let's see. So in terms of the number of associate degrees awarded, we awarded 189,000. We awarded 105,000 certificates. Our annual course completion rate last year was 71 percent, and the number of baccalaureate degrees awarded was 369.

In terms of our post-completion outcomes, we're

going to talk about that. We transferred 131,000 students last year. Our average licensure passage rates for our licensure for preparatory programs was 76 percent, and our average job placement rate for those programs was 66 percent.

W. BOSTON: Great, great. Thank you. So, one of the other questions I have is that our dashboard indicates that 74 of your institutions are in the lowest quintile of graduation rates, and 49 are in the next lowest quintile. When I looked at one of the institutions that you had as an exhibit, Jaffe College, their college scorecard graduation rate was 28 percent.

And it said the college scorecard said they were slightly below the median of 32 percent. So, would you say that, you know, your graduates being in the lower half, roughly the lower half of graduation rates for the national averages is probably because of the transfers, as well as the, you know, certificate nature versus graduation nature, or is there another explanation?

M. POWELL: No. I think that's a good place to start. Certainly, when we pulled the data of the lowest performing institutions on IPEDS, we can look across to see how well they transfer. In most cases they actually transfer quite a few students. I think generally speaking, you know, it's a little like the Lumina Foundation's quest over the last year and a half or so is how do you

market community college? What's the story of community colleges?

Not that many of our students really go into a program expecting to graduate with an associate's degree. They go perhaps to a certificate, perhaps to gain some additional credentials, perhaps to level up in workforce, so you know, the idea of a, you know, two year IPEDS graduation rate for people that are first time, full time, or even Title IV eligible, doesn't necessarily align with the students that we see in many of our institutions.

That's not to say that, you know, for instance, the Springs or Defense Language Institute, very different, their graduation rates are more like 85-90 percent. But, you know, if you look at an open access community college in which the student pays no tuition or fees, oftentimes working, oftentimes child care, oftentimes with other occurrences in their life, and not to mention, COVID.

I think you think about that metric as one datapoint among many when you think about an institution and its context.

W. BOSTON: So, if you look at our dashboard, it says that 1 percent of your students receive federal loans, 23 percent receive Pell Grants. I think the vast majority of your

schools have a net price less than \$10,000.00 based on what we're showing here, 100 schools under \$10,000.00. You just mentioned that 50 percent of your students pay no tuition or fees.

But I'm also guessing, based on an article that I read a year or so ago that most of your colleges also don't participate in the federal loan program, so their Pell Grant is only -- do you have any policies, pro or con on that for the schools?

M. POWELL: We do not. And you know, as you know, counseling students out of taking loans is not allowed by the institutions, it's certainly something that I talk a lot about. I wish that we were able to counsel our students better around taking out additional loans beyond tuition and fees, but that's something that is unfortunately precluded at this point.

W. BOSTON: Sure, sure. And then my last question related to the dashboards, I'm sure some of my colleagues on NACIQI are glad that I'm getting off of this. Is there a statistic that your agency values in particular that you would like us to add to the dashboard?

M. POWELL: You know again, I see some familiar faces. I was a Commissioner at WASC Senior, I was the Senior Vice President of Northwest Commission, looking at different types of institutions across the sector, you know, about a third of

our students in this country are community college students. I think course completion is something that we should be taking seriously. You know, if a student enrolls in a single course, do they complete successfully?

And I think it's a significant leading indicator of ultimate success in higher Ed.

W. BOSTON: Course completion, got it. I noticed that in your annual report, so thank you. And Brian, thank you for attending. So I'm going to move on to a couple other areas before I pass this over to Mary Ellen. I noticed under Section 602.15 (2) (5) public representatives, that your charter says at least 3 of your 19 Board members should be public representatives.

And then you have what appears to be a pretty consistent definition of, you know, public representative, as someone who is not an employee member of the governing Board owners, shareholders, et cetera, et cetera, et cetera, and it's designed to comply with federal Title 34, Section 602.3.

So, I'm just curious. I looked at your three current public representatives, and the dates that they were appointed to the Board, and it's interesting, and I think that two of your members were actively involved with two of your member institutions, and after their retirements, were appointed to the

Board pretty quickly.

Now, granted your institutions are nonprofits, so they didn't have any shareholder interest, but you know, I was a little surprised that you know, there wasn't a waiting period of you know, a couple of years or so. So, I'm wondering. I also didn't notice any recusals from either of these members in the meetings listed in our files, but I don't have access to go back as far as the Department does.

So, I'm just kind of curious why you have no, I guess, you know, lapsed period requirement for public members if they come from one of your institutions?

M. POWELL: Well, I certainly have been paying attention to this, given what was discussed in negotiated rulemaking. Of course, we're waiting on the Department, should they wish to change the regulations around this. I would say that our two most recent appointees have had -- Dave Broad is essentially the head of the business association of Orange County.

Excuse me, one of them is Dave Broad is the person I think you're speaking of. He was a trustee at a community college. He was actually an executive at Genentech, and so he had worked with one of the community colleges here in Genentech to produce a program that was aligned for workforce, which is

helping fuel the biotech industry here in California.

He stepped onto the foundation board, then he was on the board of the college, and then when he retired from the college he joined our board as a public member. So, he was an example of someone that was a member of industry, a member of the foundation board, a member of a governing board. To me he seems like a public member.

Of course, if the Department wants to change its definition of what constitutes a public member we would of course comply with their regulations around that.

W. BOSTON: Okay. Thank you. I know it's under discussion, I just thought I would follow through after looking at that. If I go to the section on student achievement, 602.16 (a) (1), you know, (II), and I look specifically at the annual report for Chaffy College.

I'm just curious you know that the college scorecard doesn't report information for students that are not using federal aid, but you recommend that in your annual report, that they use -- specifically use the graduation rate per the college scorecard, and not the graduation rate, for example, from college navigator. Can you explain that?

M. POWELL: Yes, I can. Gohar, are you able to

respond to that?

G. MOMJIAN: I don't have a particular explanation. Several years back we decided that it was very important for colleges to be cognizant of the data on the college scorecard. Of course, they provide various reporting on metrics through the systems that they're a part of, whether it was in the Hawaii, California system, or directly to the Department.

But as part of our reporting system, we also wanted to raise awareness of the college scorecard, and put that on as one of the items they need to report on, and we also would bring it to the Commission's attention, so that they could be aware of how colleges are scoring per the college scorecard, and then looking at the institution's own metrics and other reporting measures as they work on improving and increasing student achievement in the various category.

W. BOSTON: Okay. Thank you. The student achievement data section, per the form, only looks at the course completion rates, which you recommend that perhaps we add to our dashboard. I certainly think that's a good number. And the number, the baseline number for Chaffey is 70 percent.

But it doesn't look at the number of -- I'm sorry, and it also looks, it looks at the course completion rate as a percentage,

and it looks at the number of degrees awarded, but not the percentage of students attempting those degrees. In other words, it's just looking at numbers of degrees, it is not looking at a calculated graduation rate based on, you know, either an FTE basis, or you know, a non-FTE basis.

So, I'm kind of curious why you did it that way versus, you know, consistently staying with a percentage, like you did for the course completion?

M. POWELL: i think it's frankly, just the nature of the students. There isn't a percentage of students that we know are specifically degree granting, and therefore we would segregate that group of students, and measure an institution's success against it. And looking at Chaffey's data, you know, in terms of their transfers, licensure passage rates, and child placement rates, they are all in line with the rest of our membership.

And you know, essentially achieve their strict goals they are required to set by our standards and regulations. But it is certainly the case that any time an institution has a low graduation rate, and we signal and begin asking additional questions about its outcomes, its financial health, and its engagement with the Commission.

W. BOSTON: Okay. And then I'm sticking with

Chaffey. The college scorecard gives them credit for 15,167 students starting eight years ago for the graduation rate. Chaffey's annual report indicates they have approximately 30,000 students. I'm not sure whether the scorecard actually report students in terms of FTEs, or if the 15,167 is just students who use FSA, but what's interesting is the scorecard actually reports a 25 percent transfer rate. Chaffey's goal, transfer goal was 1,019 students out of 30,000, which doesn't even come close to matching the college scorecard transfer rate of 25 percent, which is a good number by the way.

I actually think high transfer numbers compared with your grad rate for two year programs is awesome. I'm just curious why there's such a gap, whether when you all are reviewing these reports you look at something like that, since you defer to the scorecard as an index feature, but you know, do you have any comments on that?

M. POWELL: I definitely can see that, and I see that their, you know, unduplicated headcount was roughly 31,000 in 2019-2020, and has dipped to 28,000 in 2021 and '22. We are certainly aware of the college, and the district in which its in, and are working closely on monitoring the situation.

Not specifically -- I would say it's a totality of a

challenge, not just a challenge to particularly the transfer, particularly post-grad outcomes, but the sort of challenges that have warranted a heightened engagement with the institution and the district. Gohar, do you want to comment further on that? No.

W. BOSTON: Is that a no?

G. MOMJIAN: No. I'm sorry. I nodded my head. I have no comment, thank you for covering that, Dr. Powell.

W. BOSTON: Okay. Then under significant growth, which is 602.19 (d), it's defined as greater than 50 percent, and I'm curious why that's the only bright line that you have. I mean I know it's a bright line, but at the same time you just mentioned in looking at Chaffey that they're down about 3,000 students, you know, which is roughly 10 percent.

I'm just curious in this era of troubled colleges, although most of them are not community colleges that start out with an enrollment of 30,000, why -- do you have flags in your financial dashboards that you don't make public, that look at negative growth? I'd love to find out more about that.

M. POWELL: I wish I could turn my screen around for you. Yes. I have all of the institutions ranked. I can cohort them, I can divide them by whether they're a single college district, or part of a district. I can look at their -- all of their key indicators.

Enrollment is obviously a big key indicator of financial health, as well as you know, spending on student surpluses or deficits.

So, yes, and as I shared as a result of its basically a green, yellow, red situations when institutions enter a yellow category, a red category. We engage in ongoing, and at times difficult conversations with the institution.

W. BOSTON: Okay. Then I have one more question before I'm going to hand this off to my colleague, Mary Ellen. I noticed that direct assessment is being included in your requested change of scope with the Department. And I'm curious, did you approve any direct assessment programs before changing your scope of recognition, or is the request only to comply with the changes in regulations?

M. POWELL: Oh, that's a good question, so yes, we've been in the process of approving through our substantive change process, and of course those are all contingent upon Department approval for granting them. And this has to do with an initiative of the California Community Colleges.

The Chancellor's office has identified this as an innovative practice for institutions in California. It's a pilot that has been funded by the Chancellor's office. I believe there's six institutions that are participating in this, and so each of those

institutions is in various stages of getting initial or provisional approval for us.

And once the Senior Department Official, God forbid, gives us the ability to essentially make those life, then those students could then -- those institutions could then apply to the Department for approval, and participate in Title IV funding. Gohar, is there anything else you want to add to that?

G. MOMJIAN: No, that's correct. Thank you, except for there's seven institutions in fact that have applied to us.

W. BOSTON: Thank you. And, Claude, I'm going to yield to Mary Ellen.

CHAIRMAN PRESSNELL: Sounds great.

M. PETRISKO: Thank you, thank you. So, welcome. Good to see you again. I have a few questions for you. My first question is that in looking at the information that you provided on specific institutions to us, as samples of how you conduct your work, it looked to me, and if I missed this please correct me, that institutions that were not in compliance with standard support reaffirmed for 18 months, was a requirement for a follow-up report.

But it didn't appear that the status was noted as noncompliant. Can you give me some more information here, or

am I missing something? How do you do that?

M. POWELL: Let me turn that one over to Gohar, I think she'll probably have more specifics of what was in the actual report.

G. MOMJIAN: Thank you. If you look at our policy on Commission's actions, the Commission may take an action, which is reaffirm for 18 months, when there are more minor issues, where an institution is out of compliance. So, they are reaffirmed for the 18 months, but the action letter that goes to the institution clearly specifies those standards that are out of compliance, and provides a timeline for them to come into compliance, and it does that through the follow-up reports.

M. PETRISKO: So, I have a concern then. I'd like to hear from staff about this too because I don't know if you were paying attention to some of the other conversations that we have had, there was quite a lot of conversation about taking an action, other than stating clearly this is noncompliance, when noncompliance was found.

So, I don't know if there is, you know qualitatively a difference in small issues of noncompliance when it's a standard that we're talking about, or that it's just noncompliance with a standard, but that seemed to be problematic to me if what's being

posted is that they are reaffirmed without a noncompliance statement, but then getting a follow-up report because they are in noncompliance, and then getting a timeline.

It did seem like the timeline for when they had to come back into compliance was appropriate with a timeline of what's allowed from the first statement of noncompliance, when the follow-up report was requested with the 18 months.

So, I just found that problematic that if there is noncompliance it's not specifically stated there is noncompliance, and we want the report, rather than we are renewing you for 18 months because there's noncompliance, and give us a report 18 months down the line, and we'll act further.

So maybe we can just defer that to the staff to get some further clarification on that, but you're saying that there is noncompliance in this case, is really what I was looking for, so thank you for that.

My next question is about institutions, information about program pass rates and job placement rates. And as can be expected in some cases those placement rates are lower than the institutional goals, and there could be quite a lot of variation. So, one of the things that I found, and I could be missing something, but one of the things that I was wondering was when that happens,

when the program pass rates, or placement rates are not what is in line with the institutional goals, what is the response?

Is there something that said wait a minute, you said it was going to be this, and it's not. Show us, you know, within a certain amount of time what's going on. Do you wait for the next annual report? And in some cases I couldn't tell because it was percentages that was reported.

I mean some of these numbers are small, but percentages can fool you as far as capacity to absorb, et cetera. Anyway, can you tell me a little bit more about what you do when the pass rates and the placement rates are not what's expected, what's the response?

M. POWELL: Okay, so like WASC Senior, we have a Vice President portfolio, so we have four Vice Presidents for at these 137 institutions, so I think that's the lowest ratio in accreditation. So every year all this information comes in. We have staff that are reviewing it. I review it.

If we have institutions that are going up or down significantly, typically the Vice President will speak with them. If it's something that's obviously on a dashboard that's a high level, the Vice President and I will speak with them. If it's an instance where an organization is demonstrated, let's say extremely poor

outcomes, which has happened recently, then the issue could be, and will be raised with the executive committee, and could be raised with the Commission.

So even this past year we identified some information that was either problematic or missing from an annual report. It was placed before the Commission, and the institution was placed on probation. So, that's an example of how we engage in ongoing monitoring, and so that the Commission or executive committee at any point can take action on an institution if we see one of our institutions failing to achieve an appropriate level of achievement or monitoring, either in student achievement or the school.

M. PETRISKO: So is it correct to assume that you would also look at trends, so it's not just a one year, but you would look at two or three years together to say okay, it went down, but then it went back up again, or wait a minute, it's going down, it's going down again, and it's gone down again.

So, you know, mind from one year to the next might -- don't be so drastic, but if you look over three years it looks like down, down, down, so you are doing that. Okay, great, thank you.

We were talking about bachelor's degrees, and the exhibit provided the substantive changes. A lot of the substantive

changes are additional bachelor's degrees. So, I'm just wondering what happened with the baccalaureate growth, as you may recall, actually from your time at WASC Senior, it used to be way back when there was one big umbrella before separate and independent cut these three apart that the first baccalaureate degree would be blessed by the Senior Commission.

And then the Department said no, you can't do that, you can do accreditors, so then the first baccalaureate was approved by ACCJC. So, where does it stand now? How many baccalaureate degrees are there out there? Are any institutions moving over to Senior Commission because they have so many baccalaureate degrees now? Is that a fuzzy line? Speak to me.

M. POWELL: Yeah, okay. So as I recall it I was on the WASC Senior Commission, it was two and out. So, basically a community college could have two bachelor's degrees, and the third one you'd transfer out into WASC Senior. And so, one of our institutions in Hawaii is a member of -- or one of our former, excuse me, members is now a member of WASC Senior, but that's the only one.

We generally speaking do not see an explosion of programs at institutions. We see them, you know, taking this on slowly. And it's much like credentials, you know, so we have a lot

of institutions that are heavily, you know, credentialed institutions, and yet we define them as an institution focused at the two year level.

So, I'm not sure how this will ultimately play out. I don't see, at least in this next period of review, that many of our institutions will have more than a couple bachelor's degrees, if any, at least within the California Community College system because of how tightly restricted it is. Gohar, did you have anything that you would like to add?

G. MOMJIAN: No. Yeah.

M. PETRISKO: So, am I correct in assuming that many of the bachelor's degrees are of the type that would be more suited for the kind of more technical and professionally oriented Commissions at a lot of community colleges, and that there might come a time when some of those community colleges, it's a little speculative, some of those community colleges might be wanting to do more bachelor's degrees, and you still say it's still appropriate for those to be accredited by ACCJC?

M. POWELL: An interesting question. So, yes. We're looking mostly to applied baccalaureates. As you know, in California we have a compacted basically a master plan that kind of designates who gets to do what in the plan, and so there's

significant negotiation between the CSU system and the UC system about degrees at community colleges, baccalaureate degrees that is, where they are, what they can offer, when they can offer them.

So, there is significant debate, wrangling, so I don't see the explosion of baccalaureate degrees that compete with one another at the CSU or UC system, probably in my lifetime.

M. PETRISKO: Okay, thank you. Just two more, I think simple questions. Looking back as I always do, at the transcript of previous meetings, which is always very illuminating. In the 2019 meeting there was a discussion about the possibility of reverse transfers that would improve the picture of student success at the community colleges.

And I'm wondering was that further discussed if any of that happened, because that could change the picture of student success at the associate's level?

M. POWELL: That's a great question. Obviously, come from an accreditor that had the State of Idaho, we saw a tremendous benefit for that. I don't believe that it's gone very far in California, or any of our institutions. Gohar, do you want to comment on that?

G. MOMJIAN: Yeah, I'm not aware of any heavy

discussion on that, so no.

M. PETRISKO: Okay. Thank you. And then finally, I noticed that your complaint policy was revised in January of this year, and as you may know there's been a lot of conversations in this group about complaint policies, and how they should be administered, and what should be included in them.

Can you just sort of summarize the changes in the policy, what's different in the new policy compared to what there was before, and how is that effective with what kind of complaints you might be getting in?

M. POWELL: I'm going to turn that over to Gohar, and this may take a while. It's been quite an evolution given all the conversations that we hear. You engaged in the regulatory guidance that the Department has issued. Gohar?

G. MOMJIAN: Yes. Thank you. So, our agency was already engaged in revising the policies for complaints, complaints against member institutions, as well as complaints against ACCJC itself, to make them more understandable, readable.

In practice, the agency would always help students that would reach out by email or phone. We've codified and updated our policies in line with the federal regulations, so really

making clear the various methods for complaints that can come in. We have the web form. If they email us, if they make a phone call, we communicate with every single individual within the tie lines. Those tie lines are included in plain language, a policy is in plain language at the end of the policy.

And we document those communications more formally now since instituting the policy. So, we have received in the last year 28 what I would call inquiries. Often times those complaints are of an individual nature, and we assist students, identify the routes at their college, so that they can resolve those complaints, as well as explain the purview of our agency for reviewing policy.

So, there have been 28 inquiries since January, two of those inquiries were actual complaints that we investigated further with the college, and then resolved those issues.

M. PETRISKO: Was any of those complaints something that would count as a complaint under the policy now that would not have counted as a complaint that you would have dealt with before the revision? Like if it's anonymously filed over something else?

G. MOMJIAN: No, no, I mean it's still very clear that the complaints need to pertain to the institution's ability to

meet accreditation standards. That part has not changed, so to speak.

M. PETRISKO: All right. That's the end of my questions. Thank you.

CHAIRMAN PRESSNELL: All right, thank you, Mary Ellen, Jenn, then Debbie, then Molly.

J. BLUM: Yeah. I'm going to try to be efficient too because I know we're tight on time. Just one clarification question. I know that New York, that there was mention of an institution that you accredit in New York. Do you still? Because I thought I heard you don't, okay. So, okay.

M. POWELL: We have one institution in New York still. We lost one institution that transitioned only very briefly. It was one of the institutions that the New York State agency was essentially letting go of when it was closing its accreditation functions.

And it wound up not being able to make the jump for financial aid reasons.

J. BLUM: Okay. And then the second, with the one that still is, just out of curiosity did it come over from another regional, or where did it come from?

M. POWELL: New York, same as --

J. BLUM: Same as, okay. I was just curious about that. And then my more substantive question, it's a little bit of a follow-up from Mary Ellen on this enforcement question, but with a specific example. The City College of San Francisco, which I feel like is a bit of a phoenix, just sort of rises up. And I don't, full disclosure, I don't know, you know, sort of close attachment to knowing anything about it, except for what I read in the media over I think it's like 10 years now.

And I noticed that you took a warning. You took the action of a warning recently I think earlier this year. And of course the federal regs allow for three years to I guess for that to be for them to sort of rectify themselves, except for that I think you took action a couple of years ago too.

And without, I'm not even sure what my question is except for that this seems to go on and on and on, and it raises -- I mean I think obvious concerns. I just want to hear about the history a little bit on your enforcement as it relates to City College, and where things are, and whether you have concerns about its long-term viability at this point, that you can speak to publicly at this point obviously.

M. POWELL: I was going to say I think generally in these conversations we try to speak at an institutional

accrediting agency level, and not necessarily pick on particular institutions. What I will say is that we publish everything. If you look at the accreditation action letters for City College in San Francisco, it's very clearly identified what the Commission believes the issues are.

I will say, you know, what I think is probably likely understood, it is an institution that had financial challenges. It made some extraordinarily difficult decisions. Those difficult decisions led to the institution becoming in much greater financial health than in previous iterations.

There has been a change in Board leadership, there's now been a change in CEO, and our Commission is continuing to watch to see how the institution will deal with what are publicly known to be declining enrollments, and a state funding formula that will offer challenges to it in 2025.

J. BLUM: And just to because I'm just going back to something Mary Ellen said earlier with regard to prior agencies. Your action letters are public, is that correct? So, like when you put that -- I mean I just looked at the warning letter, so I know that it is public.

M. POWELL: Yes.

J. BLUM: And the reference that Mary Ellen made

to a reaffirmation for 18 months sort of pending that letter would also, that wasn't with regard to City College. I think that was with regard to a different institution, but those -- all of your letters are made public, so the difference would be the transparent -- there is transparency in your instance.

M. POWELL: Yes. And if there are instances of something being out of compliance, we identify what that is to the letter.

J. BLUM: Okay. Thank you.

CHAIRMAN PRESSNELL: All right, Debbie.

D. COCHRANE: Hi. I will also try to be very quick. Just to follow-up on that one point. So, obviously there was earlier discussion more related to a different agency about this concept of deferral, and whether noncompliance was allowing, was being allowed to go forward without noticing other entities under 602.26.

I know you guys just had this exchange about the fact that the letters are in those kinds of cases, sort of deferral like process. The letters are still public. Are those also noticed? Other agencies under 602.26?

M. POWELL: No. Because we haven't taken adverse action against them, so I would say that just broadly

speaking, having listened to the conversation earlier, this isn't an instance where we see an institution that is substantively out of compliance, or in danger of closing, is having issues with student achievement where we would essentially give them 18 months to fix those issues.

I think that ACCJC has historically been, I would say, one of the more aggressive regional accrediting institutions that takes actions quickly when institutions fall out of compliance. I think we're also one of the few accreditors that have actually put institutions on warning because of student achievement outcomes.

So, we do not use an 18 month period as essentially an opportunity for institutions that are substantially out of compliance to come into compliance. We see them as substantially in compliance with the standards, but we see areas in which they could come into compliance on particular standards themselves.

And rarely, I don't think, if ever, had that been an eligibility requirement, which of course we would see as any institution becoming out of compliance with an eligibility requirement to be treated most likely significantly different.

D. COCHRANE: Okay. Thank you. Two other quick questions. One is around the change in scope. The change

in scope would be the current scope uses a term or the phrase, "primarily pre-baccalaureate." And now this would move to primary -- has a primary mission to granting of associate's degrees, which may also award certificates and other credentials.

But that seems like a pretty meaningful difference for some of your institutions, the ones that primarily award certificates, and not associate degrees. Is this a meaningful difference in that way?

So, I was looking at campus, former MTI College, you know, it was far more certificates than AA's. Is this a meaningful change for them?

M. POWELL: I think as a region, no. I think if you read our bylaws and our articles of incorporation I think it's pretty closely aligned.

D. COCHRANE: Okay. So, you will still accredit institutions that are primary certificate granting?

M. POWELL: We'll want to see that they grant the associate's degree. We'll want to see that they're primarily focused on associate's degree in terms of their capacity, and their degree granting authority, but that is to say, you know, I've run colleges where we were primarily associates granting that we have a big EMT population right now.

So, a six week certificate that might have hundreds of students, we don't necessarily think that the institution is primarily certificate granting, because we have a large certificate program within let's say a nursing college, or a healthcare institution, which you know, the primary revenue source and the primary faculty work is at the associate's level.

D. COCHRANE: Okay. Thank you. Third question, and I know it's a little philosophical, but I'm really interested in just like your two sentence response if you have one. And, you know, Dr. Powell, you in particular, your fluency with the data when you were speaking earlier about the agency, and you were going back and forth with NACIQI was striking, and I think not necessarily something we see from all other agencies.

And I'm just interested in your kind of again, quick thoughts. You've been with other agencies, what is it about ACCJC that makes it data knowledgeable, data driven, data forward, and you know, NWCCU doesn't look terribly different in terms of scope, but it's terribly different in terms of data on the website, for instance, so what is it?

M. POWELL: I'm gong to need more than two sentences. So, when I went to NWCCU they actually wanted someone with a national perspective that could drive data, so we

partnered with the Gates Foundation, we acquired millions of dollars. We partnered with other national organizations to kind of center ourselves in the best practices, so that was what I did seven years ago in the NWCCU.

What I inherited here at ACCJC was already a very strong agency, very strong with compliance, very strong with institutional decision making, so we brought in more technology. We brought in some grant funding, and we essentially elevated the practice a bit, but I don't think that I'm necessarily responsible for that.

I think they had a very solid foundation. I think it was just a philosophy of the CEO that the Board embraced.

D. COCHRANE: Okay. I'm hearing philosophy and CEO and key leadership positions, as well as potentially some help with grant funding.

M. POWELL: Money never hurts.

D. COCHRANE: Yeah, okay. Thank you so much.

CHAIRMAN PRESSNELL: All right, great.

Molly?

M. HALL-MARTIN: All right. I only have one question, and it's related to the institutions you serve in the Pacific territories in freely associated states. As a WICHE employee, I

would be remiss if I didn't ask something about them. So, I was wondering how you account for their unique context geographically, culturally and politically in terms of their relationship with the United States in your evaluation of those institutions in particular?

M. POWELL: I'm going to ask for help on this, but I'm going to start by saying that part of the composition of our Commission is intentionally designed to bring in representation from the Pacific. So, we have a PIIEC member, so a consortium Pacific Island Institutions Educational Consortium. They automatically have a seat on our board.

We try to bring in members from the Pacific on our visiting teams, on our advisory committees, and we try to recognize that they are an important part of our membership. It's very easy for us to become California centric, but we work very hard to make that not so.

Certainly, we've also divided our portfolio so that our Vice Presidents have more engagement, so that they actually go to the Pacific, they go to Guam, they go to the Marshall Islands, they go to wherever they need to go. So we recognize that not everything could be done over Zoom, or via paper.

So, we recognize that the relationship has to be

more conscious and conscientious. And I'm going to pause, and I'm going to let Lori talk next, and then Gohar, because I know this is a particular passion of hers as she has thought about the composition and work of our Commission.

L. GASKIN: Thank you so much, Dr. Powell. I think under GIRDS, our efforts and our focus and our work are standards. And what forms the abutment of our standards are the discreet missions of the institutions that we accredit. And so, we're so cognizant, so aware, so embracing of the different missions from Defense Language Institute to Palau, and remote areas of the Pacific.

And we embrace that. Our standards are such that it allows the institution to showcase, to inform, to educate us as to how they provide education to their students in the context of that mission, and then we're able to make informed decisions that are culturally informed, that are regionally informed, that are geographically informed, and it's a process that we're so intentional about, and so proactive as a Commission. So, I'll turn it over to Dr. Momjian.

G. MOMJIAN: I would add that our policies also lead us and pave the way to be inclusive in terms of how we approach all of our members, and we emphasize throughout our

trainings, that no institution is exactly the same, even in the same district.

And certainly, when we think about our colleges and islands, and we think about inclusivity and equity, we ensure that our practices, as we develop teams who are supposed to go and evaluate those interests, those institutions, are bringing the particular cultural competency as they review those colleges, in the context of their mission, in the context of the students that they serve in their communities, and all of the other factors that need to be taken into consideration.

M. POWELL: And let me just say one final thing. You know, we have a lot of Hispanic serving institutions, we have a lot of antithesis serving institutions. We have an institution that has applied for candidacy that would be our first tribal institution. Rather than pulling from our membership, we reached out to AHAD, to HLC, to NWCCU, to find evaluators that would be versed in tribal leadership, tribal culture.

And I'd say it's an example of where we don't just rely on what we know. We really try to be a peer based organization and reach out across the country to find and respect peers that can support institutional engagement.

M. HALL-MARTIN: Wonderful. Thank you so

much for sharing that.

CHAIRMAN PRESSNELL: Thanks, Molly.

Kathleen, and then David. You're muted, Kathleen. Kathleen?

G. SMITH: Kathleen, you're muted. I don't know
can you hear us? You're muted.

K. ALIOTO: I can hear you.

CHAIRMAN PRESSNELL: There you go.

K. ALIOTO: I wanted to say welcome to Gohar,
and she and my questions revolve around what happened between
2015, when Judge Carroll found this agency that it did not provide
a detailed written request, which clearly identified all the
deficiencies of City College's compliance with accreditation
standards, and was libel for violations of unfair competition, and
unfair business practices.

So, I understand that Dr. Wynn was quite -- Richard
Wynn was quite effective, and I would gather from Dr. Gaskin's
presentation today that she must have been quite effective as well,
but what happened over the last 9 years to have caused what I see
as 180 degree turn of this agency, and actually could be an
example to other agencies, accrediting agencies that have gone into
dark holes themselves?

And what you have done to so dramatically change

so that even City College colleagues are talking about you in favorable ways, which I never thought would happen?

M. POWELL: Yes. I should say that Richard Wynn was the very first person that ever took me on a visit when I served as a peer reviewer, and I'm going to turn it over to Gohar, because Gohar played an important role in all of that. Gohar, do you want to speak for a bit?

G. MOMJIAN: I would like to defer to Dr. Gaskin.

L. GASKIN: Do you mind if I maybe take this one?

M. POWELL: Absolutely.

L. GASKIN: Being I think the longest serving of the three of us here, you are spot on, and I appreciate the question because if it didn't recognize, it should have been. And it was a journey of introspection, a journey of seeking to understand who we were as a Commission, and how we got to that place.

And recognizing that leadership matters.

Leadership at the agency level, leadership within the Commission level, and so we took a really hard look at ourselves as a Commission, and with senior leadership. We made a change. Dr. Wynn was exceptional. He was just the right person at the right time to guide the Commission through not only the hard decision making about how we function collegiately, but also about who we

are as an accrediting organization.

He brought in exceptionally strong adaptive practices, and he made it very clear to us that it was a passion, a commitment that he held to help us right what was clearly off balance. That has continued with both the nature of the composition of the Commission, and most notably with our senior leadership, and that speaks to Dr. Powell's guidance.

So, it's been a journey, and it's you know, it never ends. We're constantly reassessing and re-evaluating ourselves, but we are definitely a different organization, a different Commission.

K. ALIOTO: What would be your advice to other accreditors?

L. GASKIN: Another phenomenal question. You know, every body, every group is different in how they understand their purpose, their charge, their role. And I think one of the first things I would do is just to seek to understand as a body, what is it that you really are charged with doing? What truly is your role, and how can you best support it without any being mired in any other agenda?

What is like truly the north star? So, that took a lot of as I said, introspection, a lot of if you will, therapy from

individuals who helped guide us through such a process.

K. ALIOTO: Well, I'm glad because what you did, what the agency did to City College was take us from 103,000 students, which may have been inflated to somewhat, but to 40,000 today, which I hope isn't inflated.

CHAIRMAN PRESSNELL: All right. Any other questions, Kathleen?

K. ALIOTO: No. I guess I shouldn't be babbling, or pontificating anymore today, but I am very glad that the agency with your leadership has turned around, and with Ms. Gohar's leadership, or Dr. Gohar, thank you.

CHAIRMAN PRESSNELL: Very good. David?

D. EUBANKS: Thank you, and thank you Dr. Powell for your cogent and passionate remarks. You obviously have a great team to work with, it must be fun to go to work. I have just maybe we could just have a quick conversation about the nature of direct assessment, and I'll start with sort of the broader scope as I understand it with the agency and standards, and you can correct me as we go along.

I don't think this will take very long. It seems like the ACCJC standards emphasize quite a lot of notions of assessment, particularly in the service of continuance prudent, that

comes through clearly in your narratives and standards, and in self-studies. I always love to read self-studies because it's like the real stuff, right.

And in the self-study documents there is some clear success stories. I'll just call out one, where an institution was analyzing the rotation of course schedules to make it easier for students to complete courses. Pretty obvious application of data to solving student problems, maybe not as easy as it sounds on paper, but convincing right? So my hat's off to that.

When I look at the student learning stuff, which starts to get to the direct assessment, it seems to get more complicated, maybe more extensive. It seems like there's a lot of paperwork involved before the institution, or the program gets to the data part.

There was an awful lot of stuff I read, and maybe this is not representative, you can tell me, an awful lot of documentation and self-studies about setting up committees, and how committees are going to talk to each other, and these things need to be aligned with those things, and then review committees, and on and on, you probably know all this.

So, my first question is does it need to be that complicated, and I assume expensive? Going in that direction,

could it be streamlined and perhaps used data methods that it developed in the last decade?

M. POWELL: Yes. Great question. So yes, when we revised our standards we took our prompts from roughly I'll say 130 to roughly 40, and we've seen the volume of our reports go from thousands of pages to maybe 60 pages of narrative, and much more heavily focused on outcomes.

So, I think you're going to see the result of the work from institutions, certainly from what we've heard from our pilot institutions already is they're much more focused on the actual data, and then the teams can come in and see okay, what did you do, how did it work, what can you do differently, and what's your plan for getting that done.

Kind of those four questions if you read our accreditation handbook, we want our institutions to do that with every piece of data, with every standard that they have. So we are seeing our institutions become more focused. We're seeing the reports being more focused, and I think that we'll see the results, I think that have started to I think bear fruit.

We see institutions that are sharing that they're closing their institutional equity gaps. We see institutions that enrollments are growing. We see institutions that are focusing on

incarcerated programs, which are growing, with rates that are extraordinarily high for completion, so the data is helping them drive and focus into program areas which are good for students, good for the college, and good for the communities they serve. Gohar, would you like to add anything to that?

G. MOMJIAN: Thank you, no.

D. EUBANKS: Thank you, great answer. One of the things that breaks my heart as a data scientist is this sort of long-standing tradition in accreditation standards for assessment that have a hard band, or a soft band against using grade data. Does your agency fall in that category, or say anything about that?

M. POWELL: What do you mean by grade?

D. EUBANKS: Like course grades. Like course grades get dismissed as indirect data, and they can't be used for reports, so institutions have to work extra hard, et cetera.

M. POWELL: Oh, gosh, this is a long-standing issue in the assessment community, right? What kind of assessment is grading? It is an indirect form of assessment. I think that we all recognize that. Certainly, we as a Commission recognize that. I think that you know, DFW rate is maybe also a rate at which we -- I would personally look at closely, but I think we all recognize that there's lots of measures that are direct and

indirect.

They're all valuable, some are more valuable than others.

D. EUBANKS: Great. Given the scope of your operation and the impact which you could have, I would encourage you -- this is just me, to take a look at the research on the statistics of grades, and the relationship to learning. And I'm just going to call out one article that was -- I'm sure you must have seen this because it was all over higher Ed news, by Denning and Colleagues.

That associated increase in graduation rates, great news, with declining learning rates in their findings due to a lack, or decrease in rigor in grading, so directly linking grades and learning, and at the same time posing a significant challenge for the assessment business.

I don't know if you're familiar with that research, if you have had conversations about it.

M. POWELL: Yeah. I mean I'd like my colleague, Natasha Jankowski, who used to run NILOA. She would sit on an airplane and ask people, you know, what did you get out of your college experience, and they'd say nothing because they equated it to a piece of paper, or a number on a page. They didn't associate it

with learning, with the outcomes of what they learned, with how they could think.

So, I think then to your point, assessment needs to be rich and robust, and it also needs to help students understand what they're getting and what they're not getting, and that knowledge can help faculty, and all of us I think of doing a better job of serving students where they are.

D. EUBANKS: That's not really an answer though. I mean maybe I didn't express it well. This seems to be like an existential crisis for the whole assessment business, and we've been working for 40 years to do one thing, and this research says we're going in the other direction.

M. POWELL: Well, I think there are a lot of datapoints. I'm not sure exactly how else you would like me to share that. Are you asking are we becoming less rigorous by the practices assessment we're using?

D. EUBANKS: I'm saying that that could be a general statement, higher education, that is correct, and it's something that we probably ought to see if we can investigate at our own institutions maybe. All right, let me just pass on that, and get to the direct assessment question.

And that is in your, if I understand the assessment

standards correctly from reading the self-studies, there's like three levels to it. There's course level program, and institutional level kind of generally, and maybe some general education thrown in there too. So my question is if that's the case, will the general -- will the correct assessment certifications follow that same scheme, or are they simply going to be at the course level? Does that make sense?

M. POWELL: And let me turn this over to Gohar, because this is really at the substantive change level, and the institutions again, these are all pilot institutions that are kind of doing it for the first time. Gohar, do you want to comment on the Chancellor's efforts?

G. MOMJIAN: Well, what I'd like to start with saying that even in a direct assessment program, just like in distance education, institutions still need to meet all of our accreditation standards, including the expectations for having learning outcomes at the course level, at the programmatic level that feeds into the institutional level.

So, there's still a focus on outcomes in general. And the Chancellor's office, working with these institutions in the pilot are looking at best practices on how to do the equation, because in direct assessment it's not based on seat time, just credit

hours. It's based on mastery and competencies, and so they need to translate that to award credit, so that students can demonstrate mastering of the expected learning outcomes for those courses and the program itself.

D. EUBANKS: But they couldn't go in and take one test and get a degree, you know, sort of take the whole program. They have to work through the courses, right? Okay. Yeah, that was my question, great. Thank you, thank you very much.

CHAIRMAN PRESSNELL: All right. Thank you, David. So, we have got -- we're a little farther down. We have three public comments, third party commenters, and but I do want to ask if there are any questions left from the Committee members before we go to the third party commenters?

And seeing none, we have three, and George, remind me it is three minutes, correct, per third party?

G. SMITH: Yes, yes. Max.

CHAIRMAN PRESSNELL: Max, three minutes, and I've got, so for those who are going to be commenting, don't get mad at me when I cut you off, but I'm going to do that if I need to do it. So, let me first see just going down the list, yeah, okay. There's Dr. Artis Eschenberg, we'll start with you, and so let's

check your mic.

A. ESCHENBERG: Aloha.

CHAIRMAN PRESSNELL: Very good. So, you have three minutes.

A. ESCHENBERG: (Speaking in Native language) Windward Community College's Pu'uhonua sites at the Women's Community Correction Center, and Men's Halawa Correctional Facility were the first prison education programs accredited by the ACCJC.

Originally operated through grant funds, we are now a public experimental site. We're the only institution in the University of Hawaii system to provide credit bearing course work, leading to a degree in an incarcerated facility. We are one of only two such programs in our entire state.

Prior to our founding there was none. ACCJC has been integral to our successful implementation of this program. They are supportive, inciteful and analytical. The substantive change process for these sites was designed to specifically address the challenges and opportunities of incarcerated education. It held us to high principles of creating experience within an in carceral environment that had parody with programs offered on campus.

In Hawaii, our incarcerated students have no access

to computers or the internet. A plane full of our men is relocated to Arizona every few months with no warning, until they're a half an hour in the air. The parameters of education in prisons are overwhelming, demoralizing, and not always predictable or logical.

During the approval process, the ACCJC rep was respectful and inquisitive. She asked clarifying questions before the visit, was prepared for the parameters of a visit, and was unphased by the restrictions of this educational environment.

She further recognized our isolation, and connected us with other successful programs, especially in California, arranging for us to meet and introducing over email. The communication with ACCJC in general has been transparent, timely and supportive.

My liaison quickly returns emails, calls me to discuss options and considerations. When the pandemic resulted in a series of long lockdowns that brought education to a standstill, she helped me consider correspondence as a modality. She provided approval of this via letter, which calmed my Deans and faculty who kept stating, "Accreditation will never allow for correspondence, we just have to shut down."

In summary, I found ACCJC to be supportive of

creating strong, educational environments that overcome multiple barriers and grows successful programs and students. They embody growth mindset, and help us to fulfill our vision to be (speaking in Native language). The beacon of known for the (Native Language) region.

I'm thankful for ACCJC, and their amazing staff that help us to grow to be our best. And since there's been a lot of talk about outcomes, I want to quickly share since 2017 we have provided 948 students with over 3,000 credits. The average GPA is 3.2, 85 percent of students pass their classes with a C or better.

This year we will award our first -- this month, our first associate's degree to a student inside. We will also award 13 certificates at that time. Allow me in the time to support my accrediting body, which is a pleasure.

CHAIRMAN PRESSNELL: Excellent job though, that was very well, very well said. Dr. Ryan Cornner, Superintendent, President Glendale Community College.

R. CORNNER: Yes.

CHAIRMAN PRESSNELL: Very good. You have three minutes.

R. CORNNER: Thank you. I'd like to thank the Committee for allowing me the opportunity to speak today about

our experience going through accreditation under ACCJC. As a background, I've had the privilege working within the community college system for nearly two decades, most of that being involved in institutional accreditation, and other improvement efforts for the efficacy of our institutions.

I've served as lead for four accreditation evaluations, and then on a peer reviewer team for six different college visits. During this time I've been able to witness a great transition in the way that accreditation has been conducted, and the related ways that it's impacted the efficacy of our campuses.

The ACCJC has become more concrete in its expectations for improvement, and the natural connections that these improvements have with our college planning efforts, and the way in which we live our institutional mission. Annual metrics have begun to be meaningfully integrated into the accreditation standards, and feedback became even more common.

This allowed us as institutions, an opportunity to recognize challenges, and to address them more fluidly. And perhaps more importantly, to address them in partnership with the Commission. Lastly, the review model has recently shifted from a single high stakes visit to a formative evaluation process followed by a visit to address those areas that had risen either to a level of

excellence, or a level of concern.

We were one of the first colleges to go through this model, and it was incredibly effective. First of all, it allowed us to know where we were standing before our final visit. The ability to know that we were less than a dozen in a review, versus more than 100 provided relief, and also focus for our campus.

Second, by providing a period between the formative and the final visits, we had an opportunity to address clearly outlined deficiencies, and were provided the leverage of a tight timeline to do so. This was an invaluable tool that focused all constituents towards correcting a problem that needed to be addressed.

Third, the relationship between the college and the Commission staff and peer reviewers during that period provided support and accountability for ensuring that solutions were in place, and in place for the long-term. Lastly, the process elicited more campus involvement in our accreditation by tying our work to a broader institutional need for improvement.

In short, the process has produced true accountability that works. Expectations have never been clearer, and more broadly understood. Standards are more integrated with the work of the college and institutional planning efforts, and the

peer evaluation model has ensured that we live up to our obligations to our communities, our students and one another.

The process established by the ACCJC in action has been a true benefit to our college. It has led to a correcting of long-range challenges in meaningful ways with a focus on sustainable change. This has been an amazing turn around for the college that would not have been possible without the revised formative process designed by the Commission, and implemented by Commission staff and dedicated peer reviewers.

Beyond our college --

CHAIRMAN PRESSNELL: Thank you. I'm going to have to have you stop right there, but again, very well said. All right. The final person on the list is John Hetts with the California Community Colleges. Dr. Hetts, can you check your mic?

J. HETTS: Yes, can you hear me okay?

CHAIRMAN PRESSNELL: I can hear you just fine. You have three minutes.

J. HETTS: Excellent, thank you. Chancellor Christian was looking forward to be here today, but had to attend to an urgent matter on behalf of our system and sends her apologies. My name is John Hetts, I'm the Executive Vice Chancellor for the California Community College's Chancellor's

Office, which is the single largest system of higher education in the country, serving roughly one-tenth of all undergraduate students nationwide.

Given my experience in the system in my role overseeing our system wide use of data and evidence and technology, I couldn't be more excited to have the opportunity to speak to you this afternoon. And I am honored to extend our unwavering support to the Accreditation Commission for Community and Junior Colleges, which accredits 113 of our institutions.

Our collaboration with ACCJC has been instrumental in upholding the highest standards of educational excellence, accountability and continues to prevail across all of our colleges. They play a pivotal role in the landscape of higher education by ensuring that our institutions meet rigorous, evidence based standards, something that's deeply important to me.

ACCJC not only guarantees the high quality of education that our students receive, but also enhances the credibility and value of all of our programs. Together, this helps ensure that our students are well prepared to meet the demands of our modern workforce, are able to secure rewarding careers with purpose, and will contribute meaningfully to our society.

One of the most commendable aspects of ACCJC is this commitment to fostering a culture of continuous improvement. Through comprehensive evaluations, the Commission provides colleges with critical feedback that serves as a foundation for our strategic planning and development.

This iterative process helps our institutions to identify areas for growth, implement new, innovative practices, and ultimately elevate the educational experience for all students. Moreover, ACCJC's emphasis on transparency and accountability resonates deeply with our mission to provide equitable and accessible education, and aligns powerfully with our system wide vision 2030.

By holding colleges to high standards, ACCJC ensures that all students, regardless of their background or circumstances, have access to a high-quality education. This aligns exceptionally closely with our four values of exclusivity and social justice, and these standards help reinforce our commitment to serving the many diverse communities in California.

Importantly, the collaborative nature of ACCJC's accreditation process is another key strength that our system and our institutions deeply appreciate. By involving a wide range of stakeholders, including faculty, administrators and students, the

Commission offers a sense of shared responsibility, and collective ownership of institutional success and the accreditation outcomes. This collaborative approach not only enhances the relevance and effectiveness of the accreditation process, but also strengthens the sense of community in collaboration with our colleges.

As we look to the future, the role of ACCJC will be more critical than ever, in an era marked by technological advancements, and shifting workforce demands, and evolving educational paradigms, the need for robust and adaptive accreditation process cannot be overstated.

Together we look to continue to build a brighter and brighter future for all of our students, our institutions and our community.

CHAIRMAN PRESSNELL: Very well done. So, Mike, you have the ability to respond, but if I could say thank you on behalf of you, that's fine, but excellent comments. I do appreciate the third party commenters, but Mike do you have a comment you'd like to make?

M. POWELL: No. Thanks, Claude, I appreciate it. Thanks everyone for the comments.

CHAIRMAN PRESSNELL: You bet. Very well done. All right. This is an opportunity therefore for the staff

member to come back up, so Mike, you're back on, and Mike, do you have any comments in response to the agency's dialogue, or with the third party commenters?

M. STEIN: None for the third party commenters. Just one very brief comment because Mary Ellen brought it up, and asked for staff clarification. You know, the agency clarified it somewhat in their comments, but ACCJC, like many or most agencies I'm aware of, have some nuanced determinations they make regarding noncompliance, and they distinguish between issues that are, you know, deficiencies, but do not rise to the level of noncompliance is one of their standards.

Based on my analysis of their petition, their Commission action policy and the documentation they submitted, it was clear to me that when an area of noncompliance was found, the Commission made a decision that there was a standard for an institution that was noncompliant. That is clearly listed in their action letters, and then of course, those letters, along with the team report is publicly available, required to be made publicly available on the institution's website.

So, the decision letters do break out what our commendations, what are recommendations for improvement, which you know, were things that don't rise to noncompliance, and

then when there are actual requirements that they made. And when there are areas of noncompliance, ACCJC did -- the institution did resolve those within the three years required by regulation.

CHAIRMAN PRESSNELL: Very good. Herman?

H. BOUNDS: I think Mike clarified unless people need a further explanation, but I'm good with what he said, so.

CHAIRMAN PRESSNELL: You're okay, Mary Ellen?

M. PETRISKO: Yes. I just think it's important when we are talking about it to use the word deficiencies there, or whatever rather than sort of, you know, minor noncompliance, noncompliance is noncompliance, and so the language should be clear. Thank you, but according to Mike it was clear in the documentation.

M. STEIN: They included decision letters for institutions that didn't meet standards related, and it can be found in 602.16, throughout 602.16 (a) (1) per the handbook, they did include additional letters for specific institutions that didn't meet each of those standards, so.

M. PETRISKO: Thank you.

CHAIRMAN PRESSNELL: Very good. Thank you. Other questions for Mike or Herman? All right. Very good.

Seeing none, that moves to discussion and vote. Is there a motion possibly?

W. BOSTON: Yes. I have a motion. My motion is to, you know, convey the staff's recommendation, which is to renew the agency's recognition for five years, and recommend approval of the agency's request to include the accreditation of the direct assessment programs in its scope of recognition.

Mary Ellen may have a tweak to that, but that's my recommendation.

M. PETRISKO: No, that's fine. I second. Thank you.

CHAIRMAN PRESSNELL: Okay. Any comments, discussion, questions about the motion? It's been moved and seconded? All right. We'll get the language up and then we will take a vote, and hopefully we can do that before we start losing members here at the top of the hour.

And I think we can, so and while I make sure that the specified language captured what you're saying that the motion is that NACIQI recommend the Senior Department Official accept all the recommendations in the final staff report for the Accrediting Commission for Community and Junior Colleges.

W. BOSTON: YES, THAT'S GOOD.

CHAIRMAN PRESSNELL: All of that is embedded in there, okay. All right. Very good, very good. Any other again, discussion? Seeing none, take the vote please.

M. FREEMAN: Zakiya Smith Ellis, how do you vote?

Z. ELLIS: Yes.

M. FREEMAN: Thank you. Zaliya Smith Ellis votes yes. Kathleen Alioto, how do you vote? Kathleen, are you muted? I can come back to Kathleen.

K. ALIOTO: Yes. Yes.

M. FREEMAN: Okay. Kathleen Alioto votes yes. Roslyn Clark Artis how do you vote?

R. ARTIS: Yes.

M. FREEMAN: Thank you. Roslyn Clark Artis votes yes. Jennifer Blum, how do you vote?

J. BLUM: Yes.

M. FREEMAN: Jennifer Blum votes yes. Wallace Boston, how do you vote?

W. BOSTON: Yes.

M. FREEMAN: Wallace Boston votes yes. Debbie Cochrane, how do you vote?

D. COCHRANE: Yes.

M. FREEMAN: Debbie Cochrane votes yes. Jose Luis Cruz Rivera, how do you vote?

J. RIVERA: Yes.

M. FREEMAN: Thank you. Jose Luis Cruz Rivera votes yes. Keith Curry, how do you vote?

CHAIRMAN PRESSNELL: He was recused.

M. FREEMAN: Oh, he was recused, okay, thank you. David Eubanks, how do you vote?

D. EUBANKS: Yes.

M. FREEMAN: Thank you. David Eubanks votes yes. Molly Hall-Martin, how do you vote?

M. HALL-MARTIN: Yes.

M. FREEMAN: Molly Hall-Martin votes yes. Art Keiser, how do you vote?

A. KEISER: Yes.

M. FREEMAN: Thank you. Art Keiser votes yes. Michael Lindsay how do you vote?

M. LINDSAY: Yes.

M. FREEMAN: Michael Lindsay votes yes.

Robert Mayes is absent. Mary Ellen Petrisko, how do you vote?

M. PETRISKO: Yes.

M. FREEMAN: Thank you. Mary Ellen Petrisko

votes yes. Michael Poliakoff, how do you vote?

M. POLIAKOFF: Yes.

M. FREEMAN: Thank you, Michael Poliakoff

votes yes, and Bob Shireman, how do you vote?

R. SHIREMAN: Yes.

M. FREEMAN: Thank you. Bob Shireman votes
yes.

CHAIRMAN PRESSNELL: All right, the motion
passes 14 in favor, 1 absent, and 1 recusal, so congratulations to
the agency. We appreciate your report.

**Recommendation: That NACIQI recommend
the Senior Department Official accept all the recommendations
in the final staff report for the Accrediting Commission for
Community and Junior Colleges.**

CHAIRMAN PRESSNELL: So, that is pretty
much going to wrap up what we can do today, and so we came
close to getting back on track. We're just one agency shy of that,
so we'll have two agencies tomorrow. We've got the American
Veterinary Medical Association, and then we'll have the
Accrediting Counsel for Continuing Education in Training, and
then we will have the policy discussion.

So, if we can keep, you know, our language as tight

as possible, but thoroughly ask all the questions that you would like to have answered tomorrow, I think we'll do well, and maybe being done shortly after the lunch break tomorrow, so we'll see. But chances are we'll probably do the two agencies, take a very small break between then when we're done with the agencies.

Have a brief break to grab something to eat, and then come back and do the policy discussion. So, hopefully that's the way it works. Any other final comments for the good of the order? Seeing none, we'll, see you all later.

(Whereupon the NACIQI Summer 2024 Meeting adjourned at 5:00 p.m.)

Exhibit 3

Adjustment of “Educational Program” Definition and Process for Non-Degree Program Notification or Approval

Overview

WSCUC is adjusting its definition of educational programs, and therefore its Substantive Change procedures for the review of new non-degree programs, beginning July 1, 2016. This procedural adjustment is being made to ensure that WSCUC conforms with the expectations of the U.S. Department of Education, which defines “educational program” to include both degree and non-degree programs.

Definition of Educational Program

Effective July 1, 2016, WSCUC will define an “educational program” as: *a program of courses carrying academic credit leading to a credential (degree, diploma, certificate, etc.)*. Each institution will continue to determine its procedures for the awarding of academic credit and which courses or programs carry academic credit. Non-degree programs that do not award academic credit are not included in this definition or in any notification or approval process.

Going forward

Non-degree programs that were in existence prior to July 1, 2016 will be grandfathered into the institution’s scope of accreditation. WSCUC member institutions will need to submit new non-degree programs for which academic credit is granted for either notification or review. The key factor in determining whether a new non-degree program will require notification or a review is whether it represents a significant departure from an institution’s current offerings.

Significant Departure: A program that is not closely related to previously approved offerings or the use of a modality that is not previously approved.

Institutions will notify WSCUC of new non-degree programs that do not represent a significant departure from existing offerings. Staff will verify that the new non-degree program does not represent a significant departure. For those programs that represent a significant departure from existing offerings, a review will be required through the Substantive Change Process.

Letters of Verification for Governmental Bodies

Occasionally, institutions request that WSCUC provide a letter verifying that a program is included in its scope of accreditation. For existing programs, the institution will be required to attest that the program was in existence before July 1, 2016. As is the case now, new programs will be verified once they have been submitted to WSCUC for notification or review (see below).

Next steps for institutions

Institutions will be directed to include their non-degree program offerings in the 2017 Annual Report. A spreadsheet will be sent to ALOs within the next few months to supply WSCUC with information regarding existing non-degree programs to ease the next Annual Report process.

Initiation of non-degree programs that are not a significant departure from existing offerings

Institutions will notify WSCUC of implementation through the program implementation form. WCSUC staff will verify that the information is accurate and that the programs in question do not represent a significant departure from existing offerings. No further action will be required of the institution if intended programming is determined not to be a significant departure from current offerings.

Examples:

- Independent teacher certificate program offered by an institution with appropriate graduate education programs.
- Certificate in business utilizing existing curriculum from an institution's existing business degree programs.

Initiation of non-degree programs that are a significant departure from existing offerings

If a new non-degree program represents a significant departure from an institution's current offerings, the program or the modality will likely require a review. Most reviews for these programs will be eligible for WSCUC's expedited review process. This process will require: 1) submission of a proposal describing the program (resources, faculty, budget, assessment, etc.), and 2) a staff review of the submitted information. In some circumstances, a new non-degree program may be subject to a more robust review by a panel of peer reviewers. This will be determined on a case-by-case basis. Some examples of programs that may require this more robust review include:

- a certificate offered online by an institution with no distance education experience or general approval.
- a program that is radically outside of existing programs (such as a single purpose institution offering new programs well outside of its current experience and expertise).

Impact on locations

The change in the definition of educational program may have an impact on an institution's requirement to report locations to WSCUC. A location at which 50% or more of a program (now including both degree and non-degree programs) is offered must be reported to WSCUC and, in most cases, will require review. As with programs, any location that is open and not already reported to WSCUC before July 1, 2016 will be grandfathered and will be reported in the next Annual Report cycle. Any new location will be subject to the review requirements that currently exist and that are outlined in the [Substantive Change Manual](#).

Frequently Asked Questions

Why the change in process and procedure?

WSCUC is making this adjustment in procedure to conform with expectations of the U.S. Department of Education.

Do non-credit offerings such as weekend seminars or offerings for continuing education hours need to be reported or approved?

No, only non-degree programs that award academic credit by your institution will need to be submitted for notification or approval.

What do I need to do right now?

Only new academic credit granting non-degree programs will need to be submitted for notification or approval to WSCUC after July 1, 2016. Those already in existence at your institution will be grandfathered

into your institution's scope of accreditation. Non-degree programs carrying academic credit will need to be reported in the 2017 Annual Report. WSCUC will, in the next few months, provide you with a method to report existing programs in order to ease the Annual Report process.

Another agency is asking for verification of our certificate program's inclusion in our accreditation. Can WSCUC verify this?

Institutions in need of verification from WSCUC for a governmental body regarding the inclusion of a program will be required to attest to WSCUC that the program was in existence prior to July 1, 2016 in order for a letter to be issued verifying that it is encompassed in its accreditation. Non-degree programs implemented after July 1, 2016 will be subject to notification and/or review.

Our extension program offers certificates that will allow students to transfer credit to other institutions. Do we need to report or seek approval for these?

Only if the programs are offered for academic credit by your institution. Credit that is awarded to students on an appeal after completion or granted by other institutions upon transfer does not apply in this situation.

Are professional certifications that my institution offers included in this? Such as software, business practices, Six Sigma certification etc.?

Only if they are offered for academic credit by your institution.

Questions?

Please contact John Hausaman, Director of Substantive Change and Committee Relations
(jhausaman@wscuc.org)