



The Career College Information Source

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The Career College Information Source



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Online Collection Spans More Than 100 Years of Career Education History

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Make an Impact: Grassroots Relationships, Local Politics and Your Students

*By TC Wolfe, Associate Vice Chancellor of Government Relations,
Southeastern College*

The best way to turn a member of Congress into an advocate – and champion – for your students is to invite them in. Wolfe outlines how to put together your grassroots efforts. **p.39**

Letter from the Editor

Accreditation! You cannot live with it. You cannot live without it. You cannot kill it. Or, can you? But, should you? These seemingly simple and silly statements and questions articulate a critical brewing debate, no battle, which could dramatically alter the landscape of all of higher education and impact most colleges and universities. This month, CER examines accreditation and its past, present, and possible future(s).

The edition begins with Michael Santoro's "Accreditation 101." This is a must read for all new employees, at all levels and will prove a good refresher for more experienced career educators. The edition then continues with articles and interviews on the state of accreditation and includes "people you know," or have heard of: George L. Pry, executive vice president, Pittsburgh Technical Institute (ACICS Commissioner, 03-08), Jeanne Herrmann, chief operating officer, Globe Education Network (current chair of ACICS) and Anne Neal, president of the American Council of Trustees and Alumni (recognized national thought leader for higher education and a member of NACIQI). These policy impacting seasoned professionals shed light on the current questions surrounding the very future of accreditation.

No discussion on accreditation would be complete without hearing from an accreditor. We interviewed Carol Money maker the executive director of ABHES. While Carol may be the youngest of the accreditation executive directors in age, she is the senior executive of all the major national accreditors and most of the regional. (Yes, Carol started in accreditation when she was 16).

Should accreditation even exist? What is its purpose and what should it be? Is accreditation a "monopoly"? Should accreditation be the "gatekeeper" for Title IV? If not the accreditors, then who? What might work better than peer review and would anything? Is accreditation necessary but not sufficient to monitor the increasing complexities of the U.S. Department of Education's rules and regulations? What about the other two members of the "tirade"? These are challenging and significant questions that will have far-reaching ramifications. Let us all hope the DOE, NACIQI, the various

accreditors, states, and Congress gets it right and carefully considers not only what problems exist, but more importantly what better ideas are available, if any. CER suggests the collective "we" do not make changes, just for the sake of change. And, in all decisions, keep what matters first and foremost—students' best interests.

CER also strongly suggests you become active in the ongoing debate in higher education. T. C. Wolfe presents a great summary, and for many readers, a refresher and reminder on how to effectively and efficiently "make an impact," through grassroots efforts. You will also find an article about an exciting project ACICS has undertaken—a historical achieve/digital library that chronicles over 100 years of career education and accreditation history. ACICS and hopefully other accreditors and schools will work with CER's strategic partner, KUCCEL, to develop a national digital library/repository covering the interesting and important history and significance of career education and the private sector's involvement.

We hope you enjoy this month's edition and we strongly suggest you share it with your team, if you are now or ever hope to be accredited or involved with Title IV.

Dr. Hutton and I would like to take a moment to thank all of our subscribers, sponsors, advertisers, and friends and wish you a successful fall enrollment! Additionally, CER will be attending the ACICS Annual Conference, November 3-5. Visit us at booth 33, we would love to speak with you in person.

Sincerely,



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CAREER EDUCATION REVIEW'S Career College Event Calendar

October 2014 –
Dates You Need to Know

November 2014

Distance Education and Training Council (DETC)

Fall Workshop
The Driskill Hotel
Austin, TX
October 5-7, 2014
www.detc.org

Accrediting Council for Continuing Education & Training (ACCET)

Annual Conference
Hyatt Regency Mission Bay
San Diego, CA
November 3-5, 2014
www.accet.org

Accrediting Council for Independent Colleges & Schools (ACICS)

Annual Conference
The Ritz-Carlton
New Orleans, LA
November 3-5, 2014
www.acics.org

Ohio Association of Career Colleges and Schools (OACCS)

Annual Meeting & Teacher/Placement Workshop & Management Workshop
Columbus, OH
November 7, 2014
www.ohiocareercolleges.org

American Association of Cosmetology Schools (AACS)

Annual Convention & Expo
Phoenix, AZ
November 14-17, 2014
www.beautyschools.org

Council on Occupational Education (COE)

Annual Meeting
Memphis, TN
November 20-22, 2014
www.council.org

December 2014

Maryland Association of Private Colleges and Career Schools (MAPCCS)

Annual Conference
December 12, 2014
www.mapccs.org

National Accrediting Commission of Career Arts & Sciences (NACCAS)

Workshop
Las Vegas Hotel & Casino
Las Vegas, NV
December 6-9, 2014
<http://naccas.org/naccas/>

Accreditation 101 – Accreditation Today

By Michael Santoro, Post-Secondary Educational Consultant

This article is a descriptive narrative of how the overall general accreditation process works today. It outlines and describes the accreditation process and discusses what the same accreditation process might look like several years from now.

Accreditation is a non-governmental, voluntary process of peer evaluation. Accreditation serves as the primary means by which post-secondary colleges, universities, institutions and schools assure quality to students and the general public. Accreditation is either institutional, programmatic, or national faith-related in nature. Each accrediting agencies is intended to assess and enhance the educational quality of either an entire institution, a specific program of study offered, or a profession offered within an institution. Institutional accreditation means the entire institution has been evaluated and assessed, from the governance and financial stability of the institution to the academic programs of study and student services at that institution. Programmatic accreditation is an assessment of a specific profession and/or academic program(s) of study such as the health professions, arts & humanities, teaching education, massage therapy, medical assisting,

nursing, engineering, law, medicine, interior design, etc., offered at an institution. National faith-related accrediting agencies accredit religiously affiliated and doctrinally based institutions, mainly nonprofit and degree granting.

Approximately 80 recognized institutional and programmatic accrediting organizations operate within the United States. It should be noted that accrediting organizations derive their legitimacy from the colleges, universities, and academic programs that created accreditation, not directly from the government.

According to the Council for Higher Education Accreditation (CHEA) document, “An Overview of U.S. Accreditation,” by Judith Eaton, the purpose of accreditation is to generally carry out the following post-secondary education roles:

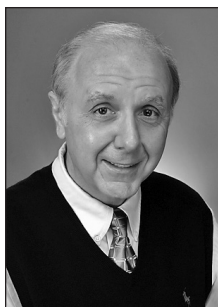
1. **Assuring quality:** Accreditation is the primary means by which colleges, universities and academic programs assure quality to students and the general public. Accredited status by an institution is a signal to students and to the public that an institution or an academic program/profession at least meets threshold standards for its educational and administrative activities.

2. Access to federal and state funds: Accreditation is required for access to most federal funding, such as student aid and other federal programs. Federal student aid funds are available to students only if the institution or academic program/profession they are attending is accredited by a recognized accrediting organization.

3. Engendering private sector confidence: Accreditation status of an institution or academic program is important to employers when evaluating credentials of job applicants and when deciding whether to provide tuition support for current employees seeking additional education.

4. Easing transfer: Accreditation is important to students to follow an easier path for transfer of courses and programs among colleges and universities. Receiving institutions take note of whether or not the credits a student wishes to transfer have been earned at an accredited institution. Although accreditation is but one among several factors taken into account by receiving institutions when deciding transfer of credit, it is still viewed carefully and is considered an important indicator of quality.

Accreditation is NOT governmental. Accreditation is NOT a police force. Accreditation is NOT a “rubber stamp.” And accreditation is NOT



MICHAEL SANTORO

has been working primarily in the for-profit post-secondary educational community since 1980. He founded and started the International Academy of Merchandising & Design in Tampa, Florida from scratch in 1984 and served as its Director/President through

1998, when the Career Education Corporation (“CEC”) purchased all of the International Academies. CEC then promoted Mr. Santoro to the CEC National Director of Compliance, where he was responsible for many different aspects of compliance throughout the company. He managed the original group of Directors of Compliance at the campus level when that compliance program first began, and also did the official responses for the individual schools and CEC for almost 98 percent of all third party complaints in the entire history of CEC and was highly effective in resolving these third party complaints. Mr. Santoro also founded the Career Education Scholarship Fund (“CESF”), a non-profit 501©3 corporation and served as its Vice President for four years after founding and beginning work in the CESF organization, in addition to his many regular compliance responsibilities. Mr. Santoro received the CEC Chairman’s Trophy for most outstanding employee among 14,000 CEC employees in 2003 and was awarded the very first Jim McEllhiney

Award for Excellence in Compliance in 2006.

Mr. Santoro was elected as an ACICS Commissioner twice, having defeated an incumbent Commissioner his first term at ACICS. Mr. Santoro served on the ACICS Board of Directors for two years. He was awarded the ACICS Evaluator of the Year in 1996. Mr. Santoro has completed almost 200 accreditation visits for several accrediting agencies and has prepared approximately another 100+ schools to get ready for accreditation visits of their own. Mr. Santoro has diligently worked on the ACICS Intermediate Review Committee (“IRC”) since 1996 and also served on the 2002 Executive Director Nominating Committee. Mr. Santoro has served as a member on three ACICS Appeal Board Hearings (2007, 2008, and 2011) and has Chaired the three most recent ACICS Appeal Board Hearings (2013, 2014-2). Mr. Santoro actively served on the Florida Association of Post-Secondary Schools & Colleges (“FAPSC”) for over 10+ years. Today, Mr. Santoro has his own consulting firm, where he assists other post-secondary educational institutions with accreditation work, complaints, operations, budgets, etc.; basically helping out with anything that pertains to post-secondary educational institutions and school operations.

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easy. In order to have value in the process of accreditation, the institution must be challenged to show its quality and success at meeting the appropriate accrediting agency benchmarks.

The **regulatory triad** is responsible and accountable for the overall oversight of postsecondary education activities in the United States. The **regulatory triad** consists of state regulation, federal regulation and accreditation. The three participants of the regulatory triad work concomitantly in order to provide the proper oversight of the postsecondary education community.

1. **State regulation:** The states serve as the licensing agency for the triad. A license to operate in the state is typically given to an institution by the state government after the institution is able to demonstrate that it meets the minimum benchmarks established by the state for licensure eligibility. The state also provides the institution with the ability to confer postsecondary credentials, including degrees, diplomas and certificates. The state serves as a primary consumer protection agency through its consumer protection rules and regulations. The state often provides another means of educational funding for the student, whether the funding be in the form of a grant, scholarship or loan.

2. **Federal regulation:** The federal government through the Higher Education Act of 1965 is able to provide students attending accredited institutions educational funding through various student federal funding programs such as, the PELL

Grant, SEOG Grant, student loans, federal work-study program, etc. The federal government also provides the student with consumer protection through various assigned governmental agencies. The federal government provides recognition of accrediting agencies as reliable authorities as to the quality of the existing postsecondary educational institutions.

3. **Accreditation:** As stated earlier, accreditation is a voluntary process in which an institution and its program are evaluated against standards for measuring educational quality. Institutions seeking access to Title IV funds for their students must be accredited.

The institution's program(s)/profession(s) seeking accreditation must go through these same basic steps stipulated by the specific accrediting agency. These steps involve a combination of several tasks: preparation of evidence of accomplishment by the institution or program/profession; scrutiny of this evidence; an on-site visit at the institution by faculty and administrative peers; and subsequent actions by the accrediting agency in response to these aforementioned action steps to determine the institution's final accreditation status. The following steps are common to most accrediting agencies, with the accrediting agency's standards and requirements being the fundamental differences. The general process is as follows:

1. Initially the institution should determine what type of accreditation to secure in order to best serve its student population with its existing academic

programs or new academic programs. Then the institution must successfully complete and submit the initial application(s) and required fees. After successful submittal of the application(s) and fees, typically, selected members of the institution will be required to attend some type of accreditation workshop presented by the accrediting agency.

2. After attending the accrediting agency's workshop, the institution then must prepare some sort of a self-study. Self-studies are defined as a written summary of the institution's or program's/profession's performance, based on a comparison of the accrediting agencies standards. The accrediting agency may provide a semi-prescriptive guide to assist the institution in preparing the self-study, since it is such an important document. The self-study describes to the accrediting agency the institution's most recent activities related to the reason for the on-site accreditation visit in the first place. Most all of the institution's faculty and administrative staff, students, graduates, employers, advisory board members, etc., are expected to participate in this self-study narrative. Their participation insures that the most up-to-date snapshot information of what is happening at the institution will allow the on-site evaluation team to compare the self-study narrative with what activities are actually taking place. The philosophical theme of "know thyself" rings true in this matter particularly with the many participants involved in the self-

study work. The more individuals involved with the self-study, the better the faculty and staff will be able to understand the institution and how it is working. The on-site accrediting team will also be able to compare their review at the institution during the on-site visit with what the requirements are in the accreditation standards.

3. After the institution's self-study is submitted in a timely manner, the accrediting agency will then perform a peer on-site visit, conducted generally by faculty and staff from other similar institutions and/or from the general public. The on-site visiting team will review the self-study narrative in relation to what the on-site team viewed as what the actual activities of the institution were at the time of the visit. The institution was expected to document their activities and provide evidence that the institution indeed did complete the activities that were listed in the self-study narrative as having been successfully completed. The on-site team members are volunteers, however some accrediting agencies provide a stipend and expenses for the evaluator's work, while other accrediting agencies offer to reimburse expenses. Team chairpersons often are offered a stipend due to the excessive amount of work assigned to them during the on-site visit. Before the on-site team leaves, it will prepare a team report outlining any deficiencies found at the institution, including any strengths found at the institution. The team report is a narrative of fact—what the visiting on-site
-

team found and saw there while they were visiting and working at the institution. The visiting team usually reviews the team report with key members of the institution in very general terms before the team actually leaves.

4. Later, the institution is mailed a copy of the team report after the accrediting agency has reviewed the team report for accuracy. The institution then has the opportunity to respond to any areas of concern or other deficiencies the on-site team may have found. This response will then be sent back to the accrediting agency where it will be reviewed by the accrediting agency's review process. The institution will finally be notified whether the institution or its program(s)/profession(s) will have earned its grant of accreditation and for how long the grant of accreditation has been extended or whether the institution has been given a deferral, whereby the institution will be given additional time to address the on-site team's concerns, since the institution will have yet to remediate the on-site team's concerns to date. The accrediting agency also has other options as to actions it could place upon the institution, depending upon the circumstances – some actions are more severe, some actions are less severe. However, generally, this process of responding is repeated (without the on-site visit) until the institution or its program(s)/profession(s) earns its grant of accreditation or it simply does not satisfy the areas of deficiencies and its grant

of accreditation will be denied. Again, this is a very general description of the accreditation process, but there are many more similarities between the accrediting agencies than there are dissimilarities during this process.

Institutional accrediting agencies are divided into two subgroups: regional accreditors and national accreditors (national career-related accreditors). Regional accrediting agencies are geographically specific and programmatically diverse. Some of the regional accrediting agencies include such accrediting agencies as NEASC, MSCHE, SACS, NCA, NWCCU, and WASC. By contrast, national accrediting agencies have no geographic restrictions, but focus on institutions that provide education in a narrower programmatic area. Some of the national accrediting agencies include ACCSC, ACICS, ACCET, ABHES, COE, DETC, NACCAS, and COMTA.

Accrediting agencies continuously evaluate their standards in relationship to educational trends in order to ensure that their evaluation processes promote institutional activities that lead to institutional and organized effectiveness. Accreditation decisions are made by groups of volunteers representing the accredited institutions and the general public, subsequently supported by paid administrative staff. Funding for accrediting agencies is providing through a combination of annual fees charged to member institutions, along with a variety of other institutional fees: Accrediting agencies are not directly supported by any governmental funding (federal or state).

Accreditation standards are typically focused on areas such as

the institution's mission, goals and objectives, its institutional effectiveness, its academic programs, its faculty and administrative staff, its student services, its instructional resources, equipment, and facilities (including its library and/or learning resource center), its publications, advertising and admissions activities, the appropriate administration of its financial aid (if applicable), and several other institutional and educational activities. Financial and other outcome reports are typically required to be submitted to the accrediting agency on a regular basis. Accreditation is granted for a specific length of time and must be renewed periodically. The accreditation choices for each institution are made based on the institutional type, their academic programs, and their local market needs. Changes to the accreditation "mix" are made, as appropriate, based on the aforementioned factors, which can change over time.

Historically, few for-profit institutions have held regional accreditation that has long been dominated by traditional nonprofit institutions of higher education. However, in the past 30 years, an increasing number of institutions have shifted from national accreditation to regional accreditation, as their institutions have obtained degree-granting authority and have become more "traditional" institutions of higher learning.

Regional accreditation is more readily understood and accepted by other regional institutions (in terms of acceptance to graduate programs or for transfer of credit consideration), by employers (in terms of employment or promotion requirements, or for

tuition reimbursement), and by state legislators (in terms of state grants and other sources of funding for these institution's students). Regional accreditation standards and procedures are typically more theoretical and less concrete, which leads to standards that are less prescriptive. The focus is primarily on academic related matters with lesser emphasis on administrative details and outcomes. It is expected that institutional decision-making will be exercised by a governing board that is composed of members of the general public, in addition to institutional representatives. These standards, while providing for much greater latitude, also provide fewer specific guidelines and require the institution to demonstrate its compliance without as many prescribed benchmarks. In addition, those serving as regional accreditation commissioners are more likely to represent traditional institutions, (rather than for-profit ones); these individuals may be less likely to understand the nuances of for-profit educational institutions since they typically do not have personal work experience in that area.

On the other hand, for-profit institutions dominate national accreditation. As a result, the standards and procedures for accreditation are more conducive to the needs of that cohort of institutions. The standards for national accrediting agencies are typically much more specific in terms of requirements and expectations, providing a much more detailed "road map" than is found in the regional accrediting standards. National accrediting agencies tend to use more forms and less narrative applications, along with more specific and frequent

institutional and programmatic reporting. Due to their career-oriented focus, these national accrediting agencies closely monitor retention and graduate placement rates and will place institutions on some type of reporting or monitoring if they fail to meet certain minimal outcome standards. In addition, these national accrediting agencies typically monitor financial stability more closely than regional accrediting agencies. The decision-making bodies are balanced between institutional and public representatives; institutional representatives are much more likely to be a “peer” than those from regional accrediting agencies given the preponderance of for-profit institutions in the membership.

In order for students at its institutions to participate in federal financial assistance programs granted by Title IV of the Higher Education Act (“HEA”), an institutional accrediting agency must be recognized by the United States Secretary of Education. Recognition requirements are included in the HEA and must be adhered to by the accrediting agencies. This recognition, which is much like “accreditation” for the accrediting agencies, is renewed periodically after a review process prescribed by the Secretary. The National Advisory Committee on Institutional Quality and Integrity, comprised of individuals appointed by President Barack Obama and Congress, reviews the accrediting agencies and makes recommendations to the Secretary for his or her final consideration.

The Council on Higher Education Accreditation (“CHEA”) is a private, non-governmental national organization that helps coordinates accreditation activity in the United

States. CHEA they represents more than 3,000 colleges, universities, and other institutions, according CHEA’s document, “An Overview of U.S. Accreditation.” CHEA also represents approximately 60 national, regional and specialized accrediting agencies and offers an additional level of recognition for accrediting agencies (institutional, programmatic, and specialized). CHEA recognition is voluntary and is not required for Title IV participation. In order for an institutional accrediting body to be eligible for CHEA recognition, a majority of the accrediting body’s member institutions must be degree granting. The general recognition standards for colleges, universities and institutions that are members of CHEA are to:

1. Advance academic quality.
2. Demonstrate accountability.
3. Encourage, where appropriate, self-scrutiny and planning for change and needed improvement (institutional effectiveness).
4. Employ appropriate and fair procedures in decision-making.
5. Demonstrate ongoing review of accreditation practice.
6. Possess sufficient resources.

“The Council for Higher Education Accreditation will serve students and their families, colleges and universities, sponsoring bodies, governments, and employers by promoting academic quality through formal recognition of higher education accrediting bodies and will coordinate and work to advance self-regulation through accreditation (1996),” states CHEA’s mission statement.

What is the future of accreditation? No one is sure at this particular moment, but it certainly has generated much discussion. CHEA has presented several well-prepared

narratives on its perspective of the future of accreditation. The government at both the federal and state levels is currently discussing the following general questions and scenarios provided by CHEA.

1. The politics of accreditation.
2. The changing landscape of higher education and its impact on accreditation.
3. The practice of accreditation.

These three general questions/scenarios provided by CHEA could serve as a basis for an overall philosophical discussion of the matter. However, the following items provided by CHEA are more specific in their pursuit of answers to the real future of accreditation:

- The Reauthorization Act: Significant changes to accreditation (marked by a larger federal role, non-academic quality indicators, keep gatekeeping and manage accreditation).
- Greater accountability and more government regulation (federal reviews).
- Diminished interest in peer review and quality improvement.
- Alternative accreditation: State, course and innovation.
- Alternative sources of quality judgment.
- Government: College ratings system.

Today, the Principles of Accreditation 101 remain fairly straightforward and simple in our day-to-day academic activities. But with the ongoing discussions taking place in Washington, D. C. and throughout the state capitals, along with the stringent actions of various Attorney Generals and other watchdog organizations throughout the land, the future of what accreditation might

be in the very near future maybe be something that looks much different from what we consider a peer review process. But until these conversations and discussions become something greater than just that, then we need to continue to follow each accrediting agencies rules and regulations and also continue to assess and evaluate the processes already in place so that the student outcomes at all of our post-secondary institutions are indeed measured against base-line indexes. We must remain diligent in our evaluative processes to insure that we are indeed reviewing each institution in relations to its accreditation rules and regulations. The accrediting agencies must remain above reproach and work hard to ultimately provide the student with the best and most outstanding opportunity to obtain an education worthy of their chosen institution. I certainly believe that our peer review process is the best approach today to provide our students with the best possible education. And as one of the “old buttons” we use to wear some time ago states, “Students Come First.” That still indicates that even today, after so many years of education here in the United States, students do deserve the best, and peer review as found in Accreditation 101 is clearly the best approach to education today. So, fortunately, our students remain in the best hands available today with peer review.

Resource:

Council for Higher Education Accreditation, “An Overview of U.S. Accreditation,” by Judith S. Eaton

Will Accreditors Maintain the Gatekeeper Role?

By George L. Pry, Executive Vice President, Pittsburgh Technical Institute, written from an interview with CER

Dr. James Hutton, publisher of Career Education Review, spoke with George Pry about his testimony before the National Advisory Committee on Institutional Quality and Integrity. NACIQI advises the Secretary of Education on matters related to postsecondary accreditation and the eligibility and certification process for higher education institutions to participate in the federal student aid programs. Its primary function is to provide recommendations to the Secretary about whether accrediting entities' standards are sufficiently rigorous and effective in their application and to ensure that the entity is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits.

Here is what Pry had to say.



GEORGE L. PRY is a highly respected educational and corporate executive with diverse experiences in all facets of college-level administration. In addition to extensive collegiate executive and operations experience, Pry also provided corporate oversight to a system of proprietary schools in areas related to state licensing, real estate, accreditation and student services. Pry is proficient in real estate negotiation, facility development, school acquisitions, fiscal management and budget

Q: Why were you asked to testify on behalf of the private sector colleges before NACIQI?

A: Steve Gunderson, a former Congressman and president and chief executive officer of the Association of Private Sector Colleges & Universities, asked me to testify before NACIQI because I have a fairly large background in regulatory affairs. I was with Education Management Corporation for 33 years in a variety of roles, from president of six of their campuses to director of operations. As director of operations, I became very involved at the state and national levels. I served on state associations in Pennsylvania, Texas and Washington. I was also on the executive committee of the Accrediting Commission for Career Schools and Colleges of Technology and I served as a commissioner

oversight. Pry has served a variety of elected and volunteer appointments including positions as chair, commissioner and president of various community, university, high school, accreditation and government agencies. Pry is responsible for successfully moving colleges through regional accreditation and baccalaureate status.

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for the Accrediting Council for Independent Colleges and Schools. In addition, I have served as chairman of the Pennsylvania State Board of Private License. I also have been chairman of the ACCSCT appeals panel for about three years.

Q: What does NACIQI do?

A: NACIQI is a committee that was created by Congress to advise the Secretary of Education regarding accreditation; some people think of it as the accreditor of accreditors. As we know, institutional accreditation is the financial aid gateway for Title IV. So it is up to NACIQI to review accreditors and make recommendations to ensure that the students who enroll in an accredited institution are attending quality postsecondary institutions.

Q: Why was NACIQI seeking testimony from you and other experts?

A: In the last few years, a number of people have questioned whether accreditation should still be the gateway to financial aid. So NACIQI was looking at its own charter, seeking outside testimony about the future of accreditation. It was very broad.

Secondly, to some extent there is a push being made upon the accreditors to be an arm of the Department of Education. Obviously, there is resistance on the part of the accreditors to do that. So therein lies the question for the conversation, and it really is a conversation that is going on right now. We have to remember that while NACIQI represents all the accreditors, traditionally they have been more involved with the nonprofits. If you look at the membership, it is broad-based and community-based; more traditional

colleges and universities, rather than proprietary schools.

Q: For clarification, can you define accreditation? Just who is approving your college?

A: Basically, accreditation is the “Good Housekeeping” sign of approval that your institution represents basic quality and is able to offer what you want to offer. There are very different accreditors. The two big groups are the national accreditors, which, for the most part, accredit the for-profits with more of a career focus; and regional accreditors, which are much broader and represent six regions across the United States. Those two groups represent 95 percent or more of all institutions of higher education across the United States. Regional accreditation also accredits primary and secondary education, and it is clearly involved in education quality.

As you may know, financial aid is based on three pillars. The first pillar is your state authority. Primarily, state authority is indicative of consumer protection, although some would argue they are also very much involved in what is the educational quality of their state. The second pillar is the accreditor, and the accreditor’s primary concern is the quality of education being offered. The last pillar is the U.S. Department of Education, which represents the financial aid regulation and the federal oversight. You have to have all three to participate in Title IV.

Q: It sounds like perhaps there is some overlap and redundancy. Do you believe that the three pillars are needed, or could one big pillar survive?

A: That argument has been going on for a long time. Another argument

questions if we even need the Department of Education, although I think they are probably sacrosanct at this point. However, the next question is do we need accreditors. Some were saying at the meeting that it would be nice if accreditors did not have to be the gatekeepers for financial aid, and instead could just ensure that colleges and universities meet their standards and represent quality education. But since the Department is giving out billions of dollars, they want to be there. The accreditors also say they should be there because if they are not, who knows who would get accredited?

Q: So then is the fourth leg of financial aid self-evaluation? What does peer review mean, and how does it differ from state review and the Department of Education review?

A: Accreditation has always been based upon the peer review system since an institution's mission is what drives that institution. Accreditors are not experts in every field so they bring in peers who can evaluate each institution based on standards. Both regional and national accreditations depend upon peers to evaluate colleges and programs and ensure they are doing what they say they are doing.

Q: Does it feel like a fox watching the hen house in the peer review process? Or is it a sound system?

A: That is always been the cry, and obviously more of a cry for the national accrediting agencies than it has been for the regionals. But even for the regional accrediting agencies, the Department of Education has said it is an old system that does not like to be challenged. In a quality situation, an objective evaluation by your peers is still the most cost-effective way to evaluate an

institution. It is a volunteer system, and the peers, for the most part, do not get paid. It is probably the most effective way in the long term.

Q: There has been a debate for a half century about who should be the gatekeeper of federal funds. So what did you say? What was your testimony?

A: I defended the role of accreditation in this process. One it is cost effective. Two, I do not believe that the U.S. Department of Education can do it effectively. Overall, I think accreditors are trying to do a good job. As long as they follow their guidelines, do a rigorous peer review, keep it objective, and not have disparity between one type of governance versus another type of governance, accreditation should play a role as a gatekeeper.

It should also be an open decision by the institution to determine what accreditor best represents its mission. The regional accrediting system has gone by the wayside with the onslaught of online education and school branches across the country. Is it really necessary to have six regional accrediting groups? Would it be better if they were all national accrediting agencies? Or should we let the regionals choose to do something different so that schools have a choice over which regional it wants to become a member of? I was not sure what the group's reaction would be to that. However, the questions seemed to be more about the gatekeeper role and whether there should be some standard of measurement that goes across all institutions. However, I was only there that afternoon and testimony actually continued for two full days with a variety of people making their points known.

There were also a couple of think-

tank discussions going on. Clearly, the point of some was that this evaluation system should determine how much financial aid you get. People were trying to define that around the issues of default and around things that would not bode well for career-focused education in the long run, only because most of our schools bring in a demographic that is not the same as the one that goes to your traditional Ivy League non-profit.

I also made a point that the Department should not use the accreditor to be the total arm for the Department. Accreditors are being forced to look at and measure everything from clock to credit hour and determine quality. It is really forcing the financial aid — the one side of this three-legged stool — to be done by accreditors. But you have to remember that NACIQI is an arm of the Department of Education and yes, they are pushing it off onto someone else.

Q: It appears they listened to you. According to their June minutes, they passed a resolution 7-4 to recommend to the Secretary that accreditors maintain the gatekeeper role. The compelling argument was that the peer review process of accreditation and quality education is a continuous improvement function. It is not about losing your accreditation; it is about continuing to improve and having a mission, meeting that mission and having your peers evaluate you along the way to improve on that mission. Title IV, however, is pretty much black and white; either you are in compliance or you are absconding with taxpayers' funds. And if you are absconding with funds, we do not give you a chance to improve; we just want you out of the club. Can you comment on that?

A: If the Department has all of these

issues that they want measured, maybe the accreditor should not be the one to do it. Maybe it is an audited function and schools should be required to annually submit an audit that could check a variety of different numbers and indices. But the accreditors' point is that they represent quality. They questioned that if they were not the gatekeepers, how many institutions in the United States would still willingly become accredited. Many said that they would. However, I believe that while the majority probably still would go through the accreditation process, it would probably be less than what it is today if you did not have that financial aid link. At the end of the day, I believe that they will continue to vote for it being a gateway. We can argue between one accreditor or another, but for the most part, accreditation does what it intends to do and that is gives you a "Good Housekeeping" sign of approval. In the short run, it will stay.

Q: From doing accreditation visits, I know trying to find team members can sometimes be a challenge and finding evaluators for fairly small programs can be virtually impossible. So how can the government have sufficient expertise to evaluate the quality of 200-400 nationally different programs? Did they have alternatives for how that would work if the Department wanted to be the one evaluating colleges?

A: There was not a strong play on the part of anybody saying the Department wanted to be the one evaluating colleges. While there is some discussion of removing accreditation as the gatekeeper, no one that I am aware of has put in any good alternative. If the Department of Education would take this over — and I do not believe it would be the Department of Education per se, but

rather another entity like NACIQI — it would end up going back to the old accreditation standards. So what is the difference? They would have to do teams. They would have to bring some expertise. If they removed accreditation as the gatekeeper, I basically see it being the same under a different name.

Q: Do you think it is possible to have a quality education institution with reasonable academic outcomes in the short run, but still not be financially or administratively capable of being a Title IV participant in the long run?

A: I do believe educational quality can exist, even though some administrative details are not being hit. Again, some of that might be due to the demographic that is being served and all of the various regulatory initiatives that are out there. It is tough for any institution to follow everything. Can you offer a quality education and still miss some of the administrative details? Sure, you can. I have seen many institutions that offered good quality education, but they were not hitting it on this point or that. That leaves accreditors with no alternative but to say that the school is on probation or out of the system.

Q: Even though accreditors are the gatekeepers by definition, would you agree that accreditation is necessary, but not sufficient as a gatekeeper?

A: Yes. That is why we are sitting where we are today with the three-legged stool. The accreditor is giving one aspect of that stool: the quality of education. Two, the Department wants to make regulations, but it is woefully behind as far as overall federal review. The third leg of the stool is states, and there are states

that are very active. Frankly, if the states were stronger across the United States and more consistent with each other, it would probably serve a bigger role in this. But we have some states that have very minimal roles and we have other states that have a large plethora of roles to look at. So then the accreditor and the Department of Education become the common filter, if you will, for the institution. But all three have to play a role.

Q: Based on your many years of experience and service to the industry, what do you think this is going to look like in 10 years?

A: Unfortunately, the administrations that come and go in those 10 years can change a role quickly. At the end of the day, I believe there will be no real change as far as the three partners that evaluate institutions: the state, the accreditor and the Department of Education. In the light of rapid information, computer technology and vast data available these days, you will see a much more streamlined evaluation of colleges and universities across the board based on data that is driven. If you look underneath what is going on now, there is a movement to try to pick out the key points that institutions should be measured under, and then determine how to collect that data. I believe we are going to see this similar three-legged stool, but we are going to be much more dependent upon national data and national benchmarks to drive the “yay” or “nay” of whether we opt in at whatever level of financial aid that is out there.

Q: We constantly hear about data. Do you see more national standards out of this data, or do you see

it more of consumer protection information, such as here are the numbers and now you make your own decision?

A: A lot of this is being pressed by consumer protection, but there is a real movement of trying to get an understanding of data that is really important. The issue is trying to come up with standards that pay attention to those underlying demographics. The default rate is a really messy number, and I have been against it being as highly measured as it is. But in looking at that, it is clearly different if you are in the top 20 percent of the economic demographics of the country than if you are in the bottom 20 percent. What should be standard for the top probably should not be standard for the bottom. If we are going to have the true value of education, then we have to provide opportunity for all different levels of our constituents. I do not think national standards would pay enough attention to the differences that happen within the institution. While I think we are going more toward that, it is always going to be a challenge.

Q: Any ending thought or comments?

A: I wonder what pressures we are going to get from the states. There are a lot of issues with online education. State authorization is sitting out there. We have reauthorization bearing down on us. That could go a number of different ways. If you look at what the Senate is trying to do versus what the House is trying to do, there are obviously key political pressures, some which are not good to our schools. For those who have been around for a long time, they have seen this kind of pressure before. There have been hills and valleys of this whole process over the years. But this one is uniquely situated. It seems to be a little more extreme than what we have felt over the years and I think some of that is because of the political pressures being placed on it. I still believe we will make it through, just like we have made it through before. But there will be some institutions, both non-profit and profit that will not exist at the conclusion of all of this.



Written by Barbara A. Schmitz.

Anne Neal Discusses Education, Accreditation and NACIQI

By Anne Neal, Co-founder and President, American Council of Trustees and Alumni, written from an interview with CER

Career Education Review spoke with Anne Neal, president of the American Council of Trustees and Alumni. ACTA is the only organization that works with alumni, donors, trustees, and education leaders across the United States to support liberal arts education, uphold high academic standards, safeguard the free exchange of ideas on campus, and ensure that the next generation receives a philosophically rich, high-quality college education at an affordable price.

Here is what Neal had to say.

Q: How do you see accreditation fitting into the mission and vision for the American Council of Trustees and Alumni?

A: We have been involved in academic accreditation reform since the earliest days of our existence. Indeed, ACTA was really a lonely voice for many years and it is gratifying that the subject of accreditation reform has now managed to find its way, even into President Obama's State of the Union message.

Back in 2001, ACTA issued our first publication on the matter, *Can College Accreditation Live Up to its Promise?* We argued then, and have continued

to argue, that accreditors have failed as gatekeepers of billions of dollars in federal financial aid and that the system has been a regulatory disaster since it has been unable to ensure educational quality, while, at the same time, raising institutions' costs. We began to look at the system early on to see whether or not it might be improved.

Q: ACTA stated that regional accreditors have failed in their mission. What, if any, difference do you see between the regional and the national accreditors?

A: As a system, accreditation has shown no capacity to ensure educational quality and to protect the taxpayer dollar. We have criticized the regional accrediting agencies for being little more than an anti-competitive monopoly; institutions have virtually no choice when it comes to selecting an accreditor. Meanwhile, the standards applied by the regionals, which oversee the vast number of institutions, have been largely self-referential. National accreditors by statute have established thresholds and outlined determinants of educational quality.

Q: You started serving on the National Advisory Committee on Institutional Quality and Integrity in 2007. What do you see as NACIQI's main purpose?

A: NACIQI is on the front lines of addressing accreditation, whether it is working and how it might be improved. In recent years it has served as a policy adviser to the Secretary of Education in terms of the Higher Education Reauthorization. It has provided a good vehicle for people to come together and talk about whether or not the accreditation system is effective or if it could be more readily replaced by simpler and better systems.

Q: Do you think the Secretary of Education actually listens to the

recommendations from NACIQI?

A: NACIQI is an advisory committee, and over the years it has made various recommendations about individual accrediting bodies. Unfortunately, in some of those instances our recommendations have not been accepted. That has given a number of us considerable cause to question whether serving on NACIQI is a good use of our time and resources. However, it is also fair to say that our policy deliberations were sent to the Secretary of Education, including the minority perspective of which I was a part. In this case, NACIQI proved to be a vehicle for raising publicly a range of issues about accreditation and it continues to be a venue for discussion about the strengths and weaknesses of accreditation.



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co-founded the American Council of Trustees and Alumni and has been president since 2003.

For over 15 years, Ms. Neal has been a prominent national player in higher education reform, publishing widely and appearing frequently on radio and television, including the PBS NewsHour, Fox Business News, CNN, Fox News, WGN, and National Public Radio. She has authored or co-authored numerous ACTA studies on historical illiteracy, federal accreditation, governance, intellectual pluralism, and cost, and contributed chapters to *Reforming the Politically Correct University* (AEI Press, 2009), *Accountability in American Higher Education* (Palgrave MacMillan, 2010), and *Intellectual Property Rights and Capital Formation in the Next Decade* (University Press, 1988). She has also convened higher education conferences under the auspices of the Philanthropy Roundtable. In 2007, and again in 2010, Ms. Neal was appointed to the National Advisory Committee on Institutional Quality and Integrity, which advises the U.S. Secretary of Education on federal accreditation.

Ms. Neal has provided expert testimony before the Commission on the Future of Higher Education, the U.S. Senate Health, Education, Labor, and Pensions Committee, the Louisiana Postsecondary Education Commission, the

California Advisory Committee to the U.S. Civil Rights Commission, and in many state capitals, and presented at conferences sponsored by the American Enterprise Institute, the University of Notre Dame, the Association of American Colleges and Universities, Montana State University, the American Association of University Professors, and the Council for Higher Education Accreditation.

Prior to joining ACTA, Ms. Neal served as General Counsel and Congressional Liaison for the National Endowment for the Humanities. She also worked as a First Amendment and communications lawyer for Rogers & Wells and Wiley, Rein & Fielding.

Ms. Neal graduated Phi Beta Kappa and magna cum laude from Harvard College with an A.B. in American history and literature. She received her J.D. from Harvard Law School where she was president of the Harvard Journal on Legislation. She also holds an honorary doctorate from Colorado Christian University. She has served on the boards of many cultural and civic organizations, and currently is a director of the Mount Vernon Ladies' Association and the Alexander Hamilton Institute.

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Q: If not accreditation, what becomes the gateway for Title IV funding?

A: It is important to think back to the origins of accreditation. Accrediting agencies started as a voluntary system of peer review, focused on self-improvement. The problems started to arise when this voluntary system became the mandatory gatekeeper for billions of dollars in federal financial aid. That drastically changed how accrediting bodies operated and it had a profound impact on their effectiveness.

When a number of us on NACIQI proposed an alternative system to the Secretary, we addressed what we perceived to be some of the deficiencies of the existing accreditation system. Accreditation has been a disastrously ineffective guardian of Title IV funding, protecting neither consumers nor taxpayer dollars. Therefore, we argued for breaking the link between federal student aid and accreditation so that accreditors would no longer be gatekeepers. We asked that there be a new, simplified and cost-effective system of quality assurance that would actually tell the public about the financial stability of institutions, as well as key information on quality and cost. We, of course, were interested in reducing the cost of federally mandated accreditation and in breaking the accreditor monopoly. We have been concerned for many years that the regional accreditors are anachronistic; geographic boundaries play little or no role in global higher education. Indeed, the realities of the Internet make regional divisions no longer sensible.

Q: If the Secretary of Education agreed to break the link, how do you

Anne D. Neal co-founded the American Council of Trustees and Alumni (ACTA) and has been president since 2003. Celebrating its 20th anniversary in 2015, ACTA remains focused on empowering alumni and trustees on behalf of academic freedom, academic excellence and accountability.

"All of us at ACTA believe in a strong, rigorous undergraduate education," Neal says. "We came together in 1995 to create an organization that would focus on certain key principles, namely that the mission of higher education is teaching, learning and the pursuit of truth, and that rational debate and the free exchange of ideas are essential to any rich education. We came together to argue for a strong core curriculum so that students would be informed by the study of human civilization's highest achievements. And we wanted to help trustees be guardians of the financial and academic health of their colleges and universities. We were also deeply concerned about rising costs, as early as 1995, at a time when no one else was. Looking at the landscape today and the public's growing concern about the lack of value, it is fair to say that we were ahead of our time!"

see the system working? In other words, how would a college gain and maintain eligibility for Title IV?

A: There are a number of options. But I think we need to start at the beginning, which is the desire by Congress to ensure that Title IV dollars only go to educational institutions that have quality, and that taxpayer dollars be protected. The alternative system that ACTA has proposed would insist that institutions prove their financial stability and do so through an independent annual audit, and that they provide key information about quality and cost. Under the current system, the consumer essentially gets no information. A school is accredited or not accredited, and it really means very little to a consumer as to what that imprimatur entails. In fact, one school can be accredited and graduate 9 percent of students, and another school can be accredited and graduate 98 percent, and to the consumer, it is virtually impossible to know the difference. That was why the four of us, a bipartisan group on

NACIQI, I might add, believed that consumers and taxpayers would be better served by a system that would provide key information about quality and cost. We made suggestions about the kinds of data that could be provided, such as tuition costs, success rates by demographics, financial aid, graduation rates, transfer rates, student loan default rates or repayment rates. This type of data would enable consumers to see how institutions were performing so they could compare apples to apples. It would really open up the performance of our colleges and universities in ways that would empower consumers to pick and choose.

Q: What would the role of the U.S. Department of Education be if this new world came about? Would you even need the Department of Education, or could the states handle its duties?

A: We would expect institutions to certify their financial stability and have that statement independently audited. We would also insist that institutions supply key metrics of performance, also independently audited. In this scenario, then, the Department of Education would be responsible only for ensuring that this data was accurate and honest, and it could properly sanction an institution, putting Title IV on the line, if the reporting were inaccurate and not verified.

For the most part, the Department would continue to do what it is already doing. But our alternative goes one step further: it says let us make this information available, potentially on a school's own website, so that a student and his or her family can find the data easily and compare and contrast institutions. There are

other ways, of course, one might go about reforming accreditation. Some have suggested opening up accrediting authority to the states – an option with which I agree. Another possibility includes a system as I just detailed, where institutions must show student learning gains before they are eligible for Title IV. In other words, Title IV would not flow unless institutions could prove students were at or above predicted learning gains. This quality indicator would mean qualified institutions could avoid the existing burdensome and costly accreditation process and permit the Department of Education, in those circumstances, without more, to certify for Title IV funds.

Q: What do you think the structure and governance of education will look like in 20 years?

A: We are in times of considerable change and disruption in higher education. Do I think that the four-year residential experience will disappear? No, but I do think it is worth paying attention to those “Cassandras” who have suggested that, if we continue on our current economic path, as many as half of the public and private colleges could go bankrupt in the next 15 or 20 years. Many of our colleges and universities are faced with significant issues of quality and cost. That is why it is a particularly exciting time to be a member of a board of trustees. Informed, active and engaged trustees are in the best position to find ways to ensure the future of their institutions, and to look creatively at ways that they can provide better quality at a lower cost.

Q: We constantly see things about the sad state of affairs in the K-12

system, and how our students are comparable to students all over the world in the first grade, but by the time they get through eight or 10 years of school, they are far behind. Higher education in the U.S., however, has always been seen as the gold standard for the rest of the world. Do you think higher education in the U.S. is losing some of that esteem? What do you see as the differences between the problems between K-12 and higher education?

A: In recent years, every day brings new stories, editorials and reports that are highly critical of higher education. Even the president of the United States has raised concerns on numerous occasions about high costs and declining quality. And as I said before, he has rightly questioned whether accreditation is protecting the taxpayer dollar and ensuring quality. He wants to put in place a federal rating system with significant financial consequences. I certainly do not agree with that. But his idea and other ideas are all indications of a growing lack of public confidence in the direction of our colleges and universities. Education costs have gone up at twice the rate of health care costs. Many people are questioning whether college has priced itself out of the market and whether or not students are getting real value. The National Assessment of Adult Literacy, conducted by the Department of Education, shows that the majority of college graduates are not proficient, meaning they cannot compare the meaning of two editorials or compute the cost of office goods. Professors Arum and Roksa in *Academically Adrift* have reported much the same – a deplorable lack of learning gains. These depressing reports suggest

that students, after spending hundreds of thousands of dollars on their education, are still ill equipped for careers. This has put higher education – and the quality assurance system of accreditation – on the defensive, and properly so.

Yes, the K-12 system has its own challenges, and there is no doubt that many colleges and universities are receiving students who are not college ready. ACT and SAT issues data yearly showing that high school graduates are not prepared for college-level work. But that does not remove the obligation on colleges and universities to insist that students be ready for college-level work before they are admitted, and, then to do whatever it takes to guarantee and ensure their success, once they are admitted, so that we can improve on the troubling trend of declining graduation rates.

Q: What do you think are the most meaningful changes we could make?

A: We need active engagement of academic leadership at all levels – most particularly, college and university trustees. Issues of quality and cost are best dealt with at the level closest to the institution. A new report, *Governance for a New Era*, should be must reading for every faculty member, every college president, and every trustee. It outlines a blueprint for higher education governance that will allow us to get a handle on issues of quality and cost. It understands that American colleges and universities have long been deemed the envy of the world, but that there comes a point when doing the “same old, same old” is no longer sensible. When times change, institutions must change their practices as well.

The report underscores the need for boards working with their presidents to articulate their mission, to be clear about their purpose and to ensure that they are not engaged in mission creep, which inevitably results in rising costs. The report focuses on protecting academic freedom and intellectual diversity. It calls upon trustees and presidents to put an end to intolerance and censorship and to return our colleges and universities to places where a robust exchange of ideas can take place.

Focusing on data are another critical issue. Trustees are often given data dumps, opaque charts and PowerPoints, which make it hard to zero in on key issues. Accreditation surely has not provided trustees or anyone for that matter with evidence that students are learning. In order to address performance, we must empower trustees and others with data that looks to the key issues of student learning and assessment, athletic spending, building utilization and the growth of tuition.

Q: Is there a place for just pure skills training, or should every program have a general education component?

A: There is a growing realization that many jobs of the future will require a post-secondary degree. It is important for high school guidance counselors, parents and others to assess the needs of their students and children as to what will be best for their future success. There are many options — community college, vocational schools, four-year liberal arts degrees and others. ACTA has focused, since our founding, on a rigorous four-year liberal arts education because we strongly believe that a foundation in the

arts, humanities, math and sciences prepares students for informed citizenship and active participation in the workforce. Our concern is that, in too many liberal arts colleges, we are seeing students graduate with vast gaps in their skills and knowledge, having never been required to take an American history or government survey, or a course in college-level science or literature. We believe that colleges and universities need to provide our college graduates with a foundation of skills and knowledge that will prepare them for a dynamic marketplace and to be informed citizens and life-long learners. It is our belief that by zeroing in on a more prescriptive core curriculum, institutions can lower costs and also ensure a common conversation for students that will help us as a society.

Q: Let us talk about the student. The community college in your neighborhood may only have a 12 percent completion rate because of the type of student they draw. If you increase your admissions standards, where would those students go?

A: There are obviously students with a range of preparations. It is incumbent on higher education to put systems into place that will ensure students, whatever their backgrounds, can find success. Take a look at the City University of New York. Their academic leadership, some years ago, decided to put remediation in the community college system, at the same time that it assured students that once they were ready for college-level work, they could move into the four-year senior college. CUNY has also done a very interesting pilot project at the community college level – putting in place a more limited core curriculum for students to take.

They determined that having too many choices often meant students got lost, which delayed their ability to move through quickly. So they developed a limited group of core choices and they mandated a full-time schedule for the students. I understand that the results have been positive. They also mandated additional advising. This is another example of what creative governance can do – where boards and academic leadership can take students where they find them and then provide the kind of advising and academic structures that will lead them to success. I think this kind of innovative thinking, and experimentation is really going to be critical going forward so that – here in the U.S. – more students can obtain a quality, rigorous, college-level degree.

Q: What role do you see the private sector, or proprietary schools and colleges, playing in this complex puzzle?

A: As I have said, there is strong belief that many of the jobs of the future will require some sort of post-secondary degree. To reach that goal, we need to welcome as many providers and as many options as possible, and that includes the proprietary sector. Over the last few years, ACTA has argued consistently that we should apply the same standards to the nonprofit sector as we do to the proprietary sector; it makes no sense to demand certain performance from one and not the other. A critical piece of any reform effort must be to allow institutions to compete on a level playing field. Students deserve the opportunity to pick and choose amongst providers because what is best for one may not be what is best for the other given personal needs, time, etc.

Q: How do you see the student body changing in the next 20 years?

A: We know that the typical student now is employed or takes courses at night, the non-traditional student. The four-year residential experience is here to stay, but I do think we must foster a regulatory environment that is receptive to all sorts of delivery methods. We need to meet the student where that student happens to be, whether it is a 40-year-old person at work who wants to have more training, or a person who has dropped out of college and is now trying to reapply credits received before to obtain a college degree. What we are looking for is a vibrant and transparent system that offers a number of pathways for students to obtain a strong education that will prepare them for a career and community.

Q: What would the world look like without accreditation?

A: If we delink accreditation to Title IV, accreditors will survive as voluntary organizations as they did at the very beginning. My sense is if you remove them from the gatekeeper role, which has become the lowest common dominator, they will have the opportunity to develop expertise so that their imprimatur will actually mean something. If we free accreditors from these gatekeeper and enforcement roles, and allow them to return to self-improvement and peer review, then they will likely be able to provide the kind of helpful input that many institutions need when it comes to enhancing educational quality. We want to set them free so that they can create some real standards for institutions. Just take a look at the immensely successful LEED certification in the field of architecture. A Silver, Platinum,

or Gold rating tells you much about the building – and it is an entirely voluntary system. This is far better than what we have now where “accredited” means good, bad, and worse. If institutions are financially sound and if they can show student performance that should be sufficient for Title IV purposes.

Q: Is there anything else you would like to add?

A: Yes, and it goes back to accreditation. One of the most urgent reasons for accreditation reform is the deeply troubling interference of accrediting bodies in the governance and management of our colleges and universities. American higher education has long been the envy of the world because we did not have an educational ministry; we fostered institutional autonomy. But with accreditors basically holding a gun to the head of our colleges and universities over the last 40 years, the accreditors have had the ability to interfere and intervene in matters well beyond student learning and educational quality. When the Southern Association of Colleges and Schools put the University of Virginia

on warning, ACTA filed a complaint with the Department of Education outlining their troubling interference in matters that were established by Virginia state law. State law is clear: boards have authority on matters of hiring and firing presidents and we found it deeply troubling to see accreditors interfere in these areas. Even more troubling, however, was the response we received from the Department of Education, which said it had no review authority because the statute did not cover governance. So as we face the Reauthorization of the Higher Education Act, at the very minimum, institutions and others should demand the elimination of the blank check provision, which essentially allows accreditors to adopt standards over and above what is specifically articulated by Congress. This open-ended power has allowed faculty and administrators on review teams to divert their attention to management and governance issues when they should have been focused on educational quality. It has to stop.



Written by Barbara A. Schmitz.

Executive Director With Nearly 30 Years of Accreditation Experience Shares Her Thoughts

By Carol Moneymaker, Executive Director, Accrediting Bureau of Health Education Schools, written from an interview with CER

No discussion on the past, present and possible futures of accreditation would be complete without hearing from an accreditor. CER talked with Carol Moneymaker, executive director of the Accrediting Bureau of Health Education Schools. To the best of our knowledge, Carol is the most senior of the executive directors for the major national accreditors. Next April, Ms. Moneymaker will celebrate 20 years with ABHES. Prior to ABHES, Carol served as the associate executive director of the Accrediting Council for

Independent Colleges and Schools from 1987 to 1995.

ABHES is somewhat unusual in that it is both a recognized institutional accreditor, aka gatekeeper, and programmatic accreditor for some health-related programs.

“Initially when ABHES was founded, close to 45 years or so ago, they were the programmatic accreditor for Medical Laboratory Technology (MLT) programs,” said Moneymaker. “From that point after, ABHES achieved recognition from the Commissioner



MS. MONEYMAKER has held the position of Executive Director of ABHES since April 1995 and has been affiliated with accreditation since 1987. Prior to assuming this position, she served as the Associate Executive Director of the Accrediting Council for

Independent Colleges and Schools (ACICS) from 1987 - 1995. As the Executive Director, Ms. Moneymaker manages the operations of ABHES, including overseeing accreditation activities and staff. She serves as liaison to state and federal regulatory bodies, including the U.S. Department of Education, and works closely with other national

accrediting agencies, as well as credentialing agencies in the health care disciplines. She is the primary liaison to the ABHES Commission and serves as staff liaison to a variety of committees, including the Commissioner Nominating and the Programmatic Accreditation for Surgical Technology. She also oversees the program sessions for the Annual Conference and is primary editor for ABHES' bi-annual newsletter, The Advantage.

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of Education, who would now be the Secretary of Education. In the mid-1960s, ABHES expanded its scope to include medical assisting on a programmatic basis, and then obtained full recognition for the accreditation of health care-focused institutions. In time, ABHES achieved recognition for the programmatic

A student or an institution should know that if an institution or program has been accredited it has met a number of rigorous criteria and standards.

accreditation of surgical technology (ST). So we currently have three programs – MLT, MA and ST that ABHES may programmatically

accredit. ABHES is also authorized to accredit full institutions.”

Unlike the typical national or regional accreditor, ABHES holds two important recognitions. In addition to the typical approval to accredit entire institutions, ABHES is recognized as an approved agency by national health care certification agencies. Many in the private career education sector, especially those teaching allied health, consider the work Ms. Moneymaker and ABHES accomplished with the medical assisting, medical laboratory technology, surgical technology, and radiologic technology certifying agencies to be seminal for proprietary schools and colleges.

CER asked Moneymaker why a student or an employer should be able to rely on any accreditor as a measure of quality, and specifically ABHES for institutions and programs under its scope. Carol feels that the predominate reason would be the accreditor’s standards.

Carol reminded CER readers that accreditation’s oversight goes “from admissions through credentialing, so a student or an institution should know

that if an institution or program has been accredited it has met a number of rigorous criteria and standards.”

In addition to the criteria/standards and the peer review process found with all recognized accreditors, there is another point unique to ABHES.

Carol said, “because we are [also] programmatic, one of our biggest challenges is that the Department of Education requires that any recognized programmatic accreditor, including ABHES, bring a practitioner as an evaluator on each programmatic visit.”

This evaluation by a professional working in the field creates another level of review but also presents challenges for the accreditor in finding qualified evaluators.

“It is very difficult to find people who can take time away from work. For example, finding a medical assistant who can comprehend a new and detailed process and who is really able to dedicate their knowledge to reviewing a program’s educational side without a lot of training can be difficult.”

These practitioners may have decades of service in their specific health care profession, but many have never taught a class or worked in an educational environment.

When asked about the ongoing debate over decoupling accreditation from Title IV participation, Carol (as did several others) responded, “I have never heard a better idea, relative to what might take over that role.”

Carol believes that accreditors perform very well in their role as assurers of quality; given the standards that the accreditors have from the minute the student applies to the college to when they graduate and perhaps become credentialed. Across dozens of accreditors, these processes and outcomes are evaluated by literally thousands of

qualified peers and, at least with ABHES and others, practitioners.

Carol asks, “what else could [Title IV and the taxpayers] rely upon that would be able to give them that surety that so much has been reviewed by specialists and educators? It is impossible to imagine any governmental agency having sufficient staff to evaluate the literally hundreds of careers in the workforce today.”

CER asked Ms. Moneymaker, as the senior executive director of a national accreditor, to “take out her crystal ball” and tell readers just what does all of this look like in five or 10 years?

She shared her nearly three-decades of experience by saying, “Having been through a similar situation before but in a whole different venue, back in the late 1980s, predominately smaller organizations, more mom and pops, did some things that really turned the industry on its head for quite some time. Now we work more often with publicly traded, “corporate megas”; entirely different groups with different needs and desired outcomes. Daily we are seeing that there is failure on the part of some organizations to monitor and truly provide the education that students hope for. There are schools closing, programs discontinuing and many teach-outs. The focus has changed along with the leadership. I am hopeful that in the end we might see, possibly in as little as five years, some individual educators, owners or operators, along with some of the smaller organizations getting involved again. [Perhaps] just seeing the whole cycle turn around.”

When asked for any parting thoughts, Carol predicted that one of the most important things is the issue of outcomes. She believes that a lack of focus on outcomes is the primary

reason why we are seeing so many schools closing. She is concerned that schools do not look at the big picture from beginning to end.

Carol reminds us that, “the admission deliberation for each student, by appropriate educators, is just as important as the placement process at the end.”

Carol believes that having a very sound process for admitting students into appropriate

suitable programs, and determining based on their own educational administrative backgrounds if they will be successful in the program, is a key for success. Alternatively, advising different career paths or robust remedial education can often help. All programs are not “right” for each student. Just because a student does not know basic anatomic structures, necessary in medical diagnosis sonography, does not mean they cannot learn and be a successful health care professional.

CER agrees with Ms. Moneymaker that the focus will significantly shift from process to outcomes. While one could argue “bright line” numbers for X percent placement or Y percent retention are difficult to determine, we predict that this is the future for all different types of accreditors. Many, such as ABHES and their accredited members, have years’ experience with assessing and requiring quantitative student outcomes. We further predict some accreditors must embrace documented outcomes to survive.

It is impossible to imagine any governmental agency having sufficient staff to evaluate the literally hundreds of careers in the workforce today.

Commitment to Integrity Creates Consistent, Compliant Experience for Students

By Jeanne Herrmann, Chief Operating Officer, Globe Education Network, written from an interview with CER

For a career college to build a culture of compliance and integrity it must be at the forefront of everything you do.

Jeanne Herrmann, chief operating officer at Globe University/Minnesota School of Business, said whether you are looking at creating a new program or policy, or developing processes around those policies, you need to consider how it will impact the students and if it is compliant.

“Part of that triad is that it has to be in compliance with your state, any accrediting bodies that you work with and the federal government,” Herrmann said. “But if you are doing things every day in the best interest of your student, it likely falls in line with being compliant.”

Herrmann said career colleges must always think about long-term success for both its students and its organization. “What may be a short-term gain for your organization may not bring you long-term success,” she said. So instead, career colleges need to focus on reputation and credibility.

“We bring students in who often are not strong advocates for themselves, and we have to stand up and be their voice,” she said. “The only credible

way we can do that is if we have their best interests at heart.”

That can be more difficult as a career college grows the number of its campuses. Herrmann knows that well. When she started at Globe, the school had only three campuses located in Minnesota. Today, 20-plus years later, Globe has 29 campuses across Utah,

We bring students in who often are not strong advocates for themselves, and we have to stand up and be their voice. The only credible way we can do that is if we have their best interests at heart.

Idaho, South Dakota, Wisconsin and Minnesota.

“One of the fears I had was that these new campuses were not local and that they would become a geographic challenge and would not have the same heart of the organization,” says Herrmann about the family-owned school. (The Terry and Kaye Myhre family operate cooperatively Globe University and the Minnesota School of Business.)

"I became concerned about how that might look..."

Yet Herrmann said she has never been disappointed in walking into one of their campuses and not immediately feeling that culture of caring and that every student matters. She said she felt that same culture while speaking at the Association of

We also have an environment where all of our admission representatives are in cubicles so we have access to every conversation that they have, whether it is on the phone or in an interview with a student, just by walking around.

Private Sector Colleges and Universities Leadership Institute. "As we tried to create a skeleton statement that the students could bring back to their campuses or organizations, there

were some great keywords that came out and they were about community and student and individual success," Herrmann said. "The keywords that the group threw out in the brainstorming session really describe what I think is the heart of our sector."

Yet Herrmann said Globe has been able to keep that "hands-on" feeling, particularly to ensure each campus

meets compliance and accreditation standards.

"Initially we built up a strong corporate structure to support the campuses," she said. "Honestly, prior to our growth spurt, we did not have any formal policy and procedure manual. So we started these great internal processes."

They built tools and resources, trained and then conducted audits and analysis, before going back and training again, Herrmann said. "Trust is one thing," she said, "but verification is certainly much more important, particularly when you grow quickly and have a lot of new people who do not have a high level of experience and knowledge."

Those new employees need resources and support. But they also need to make some mistakes and then answer to them so they fully understand the importance behind compliance, she said.

To assure compliance, Globe does some internal mystery shopping, records calls, and so on. "We also have an environment where all of our admission representatives are in



JEANNE HERRMANN is the chief operating officer for the Globe Education Network which includes; Globe University, Minnesota School of Business, Minnesota School of Cosmetology, Institute of Production and Recording and Broadview University. In her role, she oversees

operations for this multi-campus organization and works to improve communication, consistencies in process, outcomes and results, and continually strives to enhance the overall student experience. Ms. Herrmann has worked in the proprietary education sector since 1991. She has served many roles at the campus level including admissions representative, director of admissions, director of education and campus director.

Ms. Herrmann is currently serving as the Chair of the Board for the Accrediting Council for Independent Colleges and Schools (ACICS). She is the past chair of the board for the Minnesota Career College Association (MCCA) and is very

active with state legislative efforts. Ms. Herrmann sits on the Minnesota P – 20 Partnership, Itasca Project for Workforce and Higher Education Alignment, and the Minnesota Longitudinal Data Study committee. She has been active as an evaluator for ACICS since 1998 as well as served on the Association for Private Sector Colleges and Universities (APSCU) State Affairs Coordinating Council and Federal Legislative committee. Ms. Herrmann also recently co-chaired the APSCU Best Practices for Career Services initiative. She has presented nationally on many issues central to the proprietary sector as well as testified in front of Congress. Ms. Herrmann holds a Bachelor of Arts degree from Hamline University and a Masters in Business Administration conferred through Minnesota School of Business.

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cubicles so we have access to every conversation that they have, whether it is on the phone or in an interview with a student, just by walking around.”

Herrmann said they regularly conduct mock visits to campuses, much as an accreditation team would do. “It is really the best way to learn about the standards and to become more involved in applying them,” she said. “That is how I learned about the ACICS standards; I went out as an evaluator myself.” (Herrmann started doing site visits for the Accrediting Commission for Independent Colleges and Schools in 1998 and has been on the board for six years. She now serves as chairwoman of the ACICS board.)

It is also important to have an integrity-based mission. “If you have guiding principles that are based and have a foundation around integrity, you will have a strong organization,” Herrmann said.

She used PepsiCo to illustrate that. The last sentence in their guiding statements is this: “...in everything we do, we strive for honesty, fairness and integrity.” Herrmann said if that is what you are working toward, your principles will help you get there.

“It does not matter if you are bottling Pepsi-Cola, or if you are making automobiles or educating students,” she said. “If you have a mission statement that centers around integrity and fairness, you will end up with the results you want, both for your customers and for you as a business.”

A typical mission statement is based on taking care of the needs of beginning employment in a particular field. But there are several ways to build on that and add an integrity component, Herrmann said.

“I like the idea of having a code of ethics, or a statement that everyone internally signs, that demonstrates their commitment to integrity in all that they do,” she said. Rather than being proactive, you could also have

In 1991, **Jeanne Herrmann** started working at Concorde Career Institute, which had a small campus in downtown Minneapolis that offered medical and dental assisting training. It was there that Herrmann began a love affair with the career college sector and the students the sector serves.

After three years, Herrmann took a position at Globe College/Minnesota School of Business. In her 20 years at Globe, Herrmann has worked as an admissions representation, director of education, campus director and director of organizational efficiency. Since 2005, she has been the chief operating officer.

The decision to grow their schools more aggressively provided an opportunity for Herrmann to identify “best practices” from around their campuses, and to really start to work toward a consistent and compliant experience for students.

“I have always had a very strong commitment to the integrity of what we do, particularly because of the students we serve,” Herrmann said. “I have served on committees at the state and local levels, and there has been this sense that we cannot have the same type of results based on the input of the student. But in my mind, that just makes it a stronger reason to have those outcomes for our students. I feel very committed to make sure that anyone who is working in this sector always put compliance and student success at the forefront of all that they do.”

consequences that result from a zero tolerance policy. “So if you feel that your employees are not being honest, are exaggerating truths, or are not delivering on what they promised students, that gives you a more punitive direction to go.”

However, Herrmann said she prefers the more positive, proactive approach. “If everyone signs on to being part of that ethical workforce, they understand that by being honest and having integrity, they will do better as an employee. And then the students will do better and the organization will be stronger.”

A culture of compliance cannot

occur without some planning. “First, you have to define who really owns it, and while everyone will be a part of it, who is ultimately responsible for the compliance integrity of your organization,” Herrmann said. “Again, everyone needs to be involved in it

Again, everyone needs to be involved in it and you need to let the frontline people – the ones who work with your students every day, whether it be a faculty member or a receptionist – be part of the process.

and you need to let the frontline people — the ones who work with your students every day, whether it be a faculty member or a receptionist — be part of the process.”

Ask them what they think is important in the fair and ethical treatment of your students. Ask them what should be included. “Let them be involved in developing that code of ethics statement or what an audit looks like... Let everyone be involved

in creating the questions that help you get to that answer.”

Then, center your business around it, she said. “Whether you do annual planning or a quarterly in-service, or whatever means you have for bringing and communicating

with your team, have that be at the core so that it sets the foundation for your team,” Herrmann said. “Do not let it just be a statement; make sure you are measuring it, and then you will always be working toward continuous improvement.”

Naturally, there will be ethical obstacles to overcome, such as what an admissions presentation looks like, how you define placement, or what is included in a calculation. But there are also less obvious obstacles, such as what does your academic advising look like, or are you ethically working toward helping a student meet their completion or are you allowing them to make excuses about their ability to get there.

“Sometimes, I think we can be so customer-centric that we forget to set the right standards and boundaries to help students be successful,” Herrmann said. “We accept that they are too busy and can never be a full-time student, but do we set them on the best path for success in our academic advising? Are billing statements clear? Do students

fully understand their obligations? When we talk to them about the cost of education, are we truly helping them understand that the money they are now taking out to help with the cost of living is still money that has to be paid back? Are we really questioning them about what they have done to change their lifestyle that now requires them to have an additional stipend to go to school?”

Compliance and accreditation are different, although they have significant similarities, Herrmann said. “Accreditation is the quality improvement process where you continually work to become better,” she said. “It has significant compliance components to it, which are minimum benchmarks. But there are some pretty black-and-white rules you have to meet in order to remain compliant, and they need to be audited and trained toward.”

So should accreditation continue to be the gatekeeper for Title IV funds?

That is an interesting question, Herrmann said. “Title IV does have very specific, black-and-white standards that must be met,” she said. “But I like having accreditation involved in the process because it is not just about minimum standards. It is about getting better every day.”

But accreditation is at risk, she acknowledged. “There has been enough scrutiny around what is its value,” she said. “Does it make higher educational better? Is there transparency and accountability there?”

“Accreditors are going to have to define their value, not just to member institutions, but also to the general public,” she said. “Accrediting bodies are going to have to change pretty dramatically in the next year or so, and they are going to have to evolve and be ready to meet those needs. But most importantly, they must be able to foster innovation. Education needs to look different than it does today. While everyone acknowledges that, no one is really moving toward that target. I think national accreditors have a tremendous opportunity to get

Accrediting bodies are going to have to change pretty dramatically in the next year or so, and they are going to have to evolve and be ready to meet those needs. But most importantly, they must be able to foster innovation. Education needs to look different than it does today.

out in the forefront, but they are going to have to be change agents in that regard.”

In addition, if schools are to be prepared for their next accreditation visit, they need to realize changes are occurring.

“Certainly the way accreditors define and verify placement will be a significant change in the process,” Herrmann said. “Accountability will also become more important. I believe the standards will be enforced more consistently than they have been, so people will need to be well-versed on what the standards are and be ready to comply in fairly short order.”

That is particularly important since there seems to be an increased commitment by accrediting agencies to make tough decisions sooner about whether to pull accreditation.

Until a foundation is built around accreditation, integrity and ethics, the sector will continue to struggle from a credibility and reputation standpoint, she said. However, a 20,000-plus-page archive of historical information created by ACICS should help to

overcome that.

“What I think is most significant is that it brings to the forefront and creates easily searchable archives that demonstrates this is not new,” Herrmann said. “For 100-plus years, this is an organization that has been committed to quality improvement, to compliance, to ethical standards, and to transparency and accountability of our membership. You can go back and you can read an article from the 1940s, or from 1910. While the words change a bit, the meaning behind it and the conversation around it has not changed, and the commitment to quality continues to be there. I just think it adds a significant amount of legitimacy, as well as demonstrates, again, this unwavering commitment that we have had toward becoming a credible and recognized equal player, or sector in higher ed.”



Written by Barbara A. Schmitz.

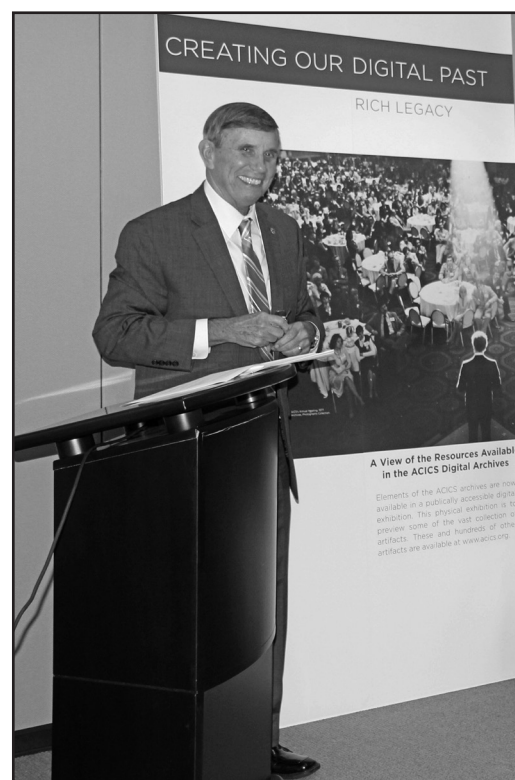
Online Collection Spans More Than 100 Years of Career Education History

By Tony Bieda, Vice President of External Affairs and Quentin Dean, Senior Regulatory Affairs Coordinator, ACICS, written from an interview with CER

In 2012, Tony Bieda, Vice President of External Affairs at the Accrediting Council for Independent Colleges and Schools had a great idea. While working on the ACICS Centennial project, he realized that there was a richness of artifacts and archival materials sitting on the shelves at ACICS, and with today's technology, they could be shared with everyone. "[The artifacts and archival materials] have been in other publically distributed publications and forms over the years, but they were doing nobody any good sitting on the shelf," said Bieda. So the digitization of over 100 years of archives began.

The idea for the digitization initially grew from a book written by Bob Cohen, entitled "Setting Standards: 100 Years of Accredited Career Education." Because of the research on the book, Bieda and Quentin Dean, Senior Regulatory Affairs Coordinator at ACICS, began the research on what is now a compilation of artifacts and archival materials from ACICS's long history. Dean is the archivist on the project. "I am responsible for overseeing the project, or the website itself, and the continuous input and updates that we do." Dean went on

to explain, "The idea had been there since creating the Centennial book in 2012. We did the research and finalized the arrangements with the vendors in the summer of 2013, and we went to digitization in the fall. It took a little bit longer than expected, so in February/March 2014 all the digitization was



Dr. Albert C. Gray, President and CEO, ACICS, delivers opening remarks during the ACICS Historical Archives ribbon cutting ceremony.

ready. Then they uploaded it to the website and it was finished in April.”

In its current form, ACICS is less than 20 years old. In its precursor organizations, it had a variety of different identities, including AICS, UBSA and NAACS. It goes all the way back to the formation of a private career college association, with 21 schools back in 1912. These 21 private business school owners in the upper Midwest realized that if regional institutions were going to have their own self-governed form of quality assurance, that the career colleges, or the private business schools at that point, needed to do likewise in order to ensure the integrity and quality of the institutions, and also to be able hold their head up as being comparable and relevant to the workforce development needs of the community and the country at that time.

“From 1912 until 2012 when we had our Centennial, ACICS evolved as the schools evolved, and changed over the years from its humble roots as a voluntary quality assurance organization for a little more than 20 small business schools to its current form where it has more than 960

member institutions serving almost 900,000 students across 57 states and 10 foreign countries,” said Bieda. The evolution of ACICS was a result of a demand for career education, and the need to assure the quality of those institutions. It has grown for a variety of reasons that have to do with the development of the country, the development of the economy and the diversification of the post-secondary education in the U.S.

Dean explained, “It was not until around 1921 when they decided to create a publication every month that was a journal of all the events, meetings, stories about schools, updates, etc., about the organization and its institutions. One of the reasons why these schools got together was to set standards so that students would know that they were reliable schools. Those standards, as Tony said, have grown into the criteria that we have today. All of that material from 1921 up until today, which is about over 1,300 monthly publications with 20,000 pages and hundreds and hundreds of vintage photographs, is now on display on this website.”

Interestingly, 12 schools that are members of ACICS today can trace



MR. BIEDA has served as primary advocate for ACICS, the largest and oldest nationally recognized accreditor of career colleges and schools, since 2007. He represents the Council in front of policy forums at the state and federal level, particularly focusing on issues regarding the source

of accreditation, the process and substance of quality assurance, the metrics of student learning and the relationship between effective career education and workforce readiness. Mr. Bieda has more than 35 years experience as a policy liaison for telecommunications, public higher education, county government and career education. He

earned a bachelor's degree in journalism at the University of Northern Colorado; an MBA in finance at Regis College, and coursework toward a Ph.D. in public policy at George Mason University in Virginia.

He initiated “The Workforce Skills Reality Check,” in 2011, and “The Underemployed Generation” in 2013, seminal research projects commissioned by ACICS to evaluate expectations of contemporary employers and students regarding post-secondary education that leads to relevant employment.

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their direct lineage to some of those 100-year-old groups. “Some of them go back more than 100 years in terms of their formation, and have roots that go back to the late 1800s. It is a very substantial, organic phenomenon, filling a void, filling a need for workforce development that otherwise was not getting met by any other set of institutions,” added Bieda.

Dean shared that the project took about a year, which was longer than expected, but they wanted to make sure they had all the facts straight before they made it available publically. “That was our key imperative—that everything has to be right in it.”

Bieda added, “Even though this collection spans more than 100 years of this primary oldest and largest accreditor of career colleges in the U.S., does it constitute the alpha to omega of all of the available archive material relative to this sector? The answer is absolutely not. It is a good critical mass, but we assume that for every artifact that we know of, there may be two more that we do not know of that are not part of a collection and they could reside in historic archives over at APSCU, or in hard copy archives at ACCSC or ABHES or DETC, or they could reside in some of the collections of individual schools.”

Bieda and Dean consider the project as a starting point, and add that they are not sure if they are going to be adding 10 percent more artifacts a year for the next 10 years, or 1 percent more artifacts. “We hope that [the project] not only serves as a critical mass that is available to current researchers, but that it is also a stimulus for other holders of artifacts who have not found a way to make those public to let us know about them, so we can work with them and

A Rich History of Quality Assurance

“We are excited to share this rich treasure of artifacts from a colorful and long-lived community that has been instrumental in shaping the workforce of our country for more than 100 years,” said Al Gray, president and CEO of ACICS.

The ACICS Historic Archives consists of over 20,000 pages of information spread over nine collections:

1. The Periodicals Collection.
2. Historical Monographs.
3. Institutional Effectiveness Monographs.
4. Annual Reports and Key Operating Statistics.
5. Membership School Directories.
6. Accreditation Criteria.
7. Manuscript Originals.
8. Photographs.
9. Commemorative Documents.

The website allows users to download documents, share documents and pictures with others via email, Facebook, Twitter, Pinterest etc. Visitors to the site can also conduct searches on topics about schools, programs, individuals, etc. using “Optical Character Recognition” (OCR), making it possible to search the entire collection and find difficult to find information in a matter of seconds.

give those artifacts a presence, either on our website or through a link to other websites,” said Bieda, adding, “It does not have to all reside on this particular website, but if there are other websites that are directly related to the sector and its history, we will put those links on our historic archive website so it creates that organic network of resources for a historical researcher.”

Dean explained that one of the main impetuses for the creation of the website was to be able to display to the general public, policymakers, students, and researchers, the long history of quality assurance that has been around now for over 100 years. “If you look through the pages, you will see how quality assurance was one of the main points throughout the history of the organization. History has a tendency to repeat itself. The organization’s career education has gone through ups and downs and all through those years you can read the history of how they have come together to set higher and higher

standards for schools and that they have been part of mainstream education in America for that long.” Dean commented, “One of the great things that we have included in the archives are handwritten cards that log the Council’s actions, between 1970 and the late 1990s.”

Bieda and Dean are taking the archival process very seriously. ACICS scanned the original documents and displayed them once Aug. 5 during a launch ceremony. Those artifacts will now be placed back in archival quality storage boxes and sent to a climate controlled archival facility for permanent storage. Bieda explained, “We assume that only on rare occasions, and only under the supervision of our curator, Quentin Dean, will we give anybody subsequent access to the original artifacts. Many of them are very

perishable. When you are looking at things that are 30, 40, 50 years old, particularly print matter, of course the ink starts to fade, the paper starts to turn yellow. They do best if they are kept in the dark, in a cool and dry place, and we will preserve them as long as possible.”

Bieda and Dean hope that the archival project will be a resource for ACICS’s schools, some of whom may not have preserved their history in the extensive way that they have done, and use this resource to find information about their own schools, people who worked there, students who graduated, programs that they offered and locations that they have had. “We have directories from 1948, up until today. We have street address information, administrator information, course offerings, etc. It is going to be a great resource,” said Dean. Bieda and Dean will also reach out to ACICS’s schools to make sure they know that they have the archives as a resource for their own information and for their own history.

The ACICS archival project is free and available on their website. Go to www.ACICS.org, choose the “About Us” tab, and choose “Historical Archives” from the drop-down menu. There, you will have access to nine collections, spanning periodicals, photographs, monographs, and annual reports.



Ms. Jeanne Herrmann, Chair, ACICS Board of Directors, provides an overview of ACICS Historic Archives to the assembled guests.

The Inauguration and Premiere Exhibition of ACICS's Historical Archives, August 5, 2014.



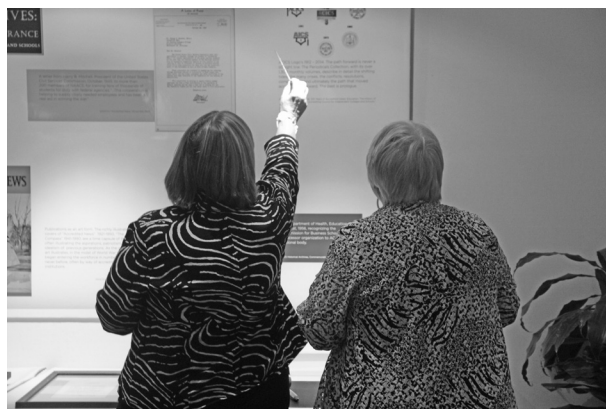
Ms. Diane Auer Jones, Senior Vice President, Chief External Affairs Officer, President of the Career Education Scholarship Fund (CESF), Career Education Corporation, views historical items on display.



Dr. David Sohn, President and CEO, Igloal University, Annandale, VA (left) And Mr. Anthony S. Bieda, Vice President of External Affairs, ACICS, (right) discuss ACICS Historical Archives.



ACICS Commissioner Edwin Colón views letters from President's Ronald Reagan and Jimmy Carter from the ACICS Historical Archives Commemorative Documents Collection.



Ms. Jeanine Ford, Vice President of Administration, ACICS, (left) and ACICS Commissioner Linda Blair (right), discuss ACICS logos between 1912 – 2014.



Ms. Badamsukh Yadamsuren, Vice President of Academic Affairs, Virginia International University, Fairfax, VA, views historic black and white photographs of past ACICS Commissioners. The ACICS Historical Archives illustrate the generations of leaders who have shaped accreditation standards and ACICS for more than 100 years.



Recordation of accrediting actions: From the early 70s through the mid 90s, these cardboard journals recorded by hand the official actions of the Council for member institutions. More than 1,200 of these cards are stored in the physical archives; a representative sample (redacted) are available through the digital historic archives.

Original vintage photographs of the life and times of career colleges and schools affiliated with ACICS and its predecessor organizations. ACICS Historical Archives, Photographs Collection.

Make an Impact: Grassroots Relationships, Local Politics and Your Students

*By TC Wolfe, Associate Vice Chancellor of Government Relations,
Southeastern College*

Many in the private sector college and university community are keenly aware of the dialogue about higher education currently underway in Washington, D.C. Many news articles, some late-night comedy shows and plenty of our lawmakers in the nation's capital have had something to say about career education, one way or the other. What is often missing in the dialogue is the voice of our schools, students and leaders. You can have an impact in this debate, through local grassroots efforts.

Grassroots is one of the most effective ways to showcase your school. While there may be a few variations or definitions about how to go about conducting your grassroots, the point is this; elected officials respond to their constituents. Their staff pays attention to the feelings of the district on all kinds of issues, whether they are hot button topics or not. They have trusting relationships

with individuals or organizations to collect information, facts and statistics. You can be this source. This communication style aides those of you who do not reside inside the Beltway and is for those who do not

While there may be a few variations or definitions about how to go about conducting your grassroots, the point is this; elected officials respond to their constituents.

have the means or capacity to travel to and from Washington, D.C.

First, figure out what is most important to your students: Is it access to financial aid, state grants, choice of education, small classes, or transportation needs? This will determine where you should begin.

The number one way to impact someone's opinion about an issue is to directly contact him or her. The best way to turn a member of

Congress into an advocate – and champion – for your students is to invite them in, explain concerns or support for an issue and to allow your students the chance to tell them what they want to do with their lives, why they chose the college they did, what

their needs are, where they want to work and what their dreams are.

Elected officials will be most responsive to

those constituents and voters who actually live in their district. Your campus is likely represented at the local level by a city commissioner and a county commissioner. At the state level, the campus is represented by a member of the House of Representatives and the Senate. At the federal level, it is represented by a member of the United States House of Representatives and of course, your two United States Senators. Visit www.congress.gov to help you identify your elected officials or search online by zip code.

Now that you know whom to contact, create your inventory list. Figure out what assets you have, such as:

- Student government association.
- Alumni.
- Membership in a chamber of commerce.
- A local chapter of a veteran's service organization.

Write down contact names and phone numbers. These advocates will help you communicate the needs of your students.

Organize your priority list based on a few factors: political party, committees of jurisdiction and leadership designations. You will want to communicate with the member of Congress who physically represents your campus, and any others who happen to sit on key committees. Look in these places to see if any of the other members of Congress from your state, sit on key committees of jurisdiction on higher education such as, the House: education and workforce, appropriations, veterans' affairs and armed services committees. The Senate counterparts are: health,

Organize your priority list based on a few factors: political party, committees of jurisdiction and leadership designations.



TC WOLFE graduated from The Ohio State University and is currently the Associate Vice Chancellor of Government Relations at Southeastern College. He has been with the College since 2007 and leads a team of three in the Government Relations office to support college

students in Tallahassee, Florida and Washington, D.C.

He gained experience working in the Ohio Senate in various capacities from 2002 through 2005. He was the Legislative Aide to a Member of the state Senate, and victoriously guided a Senate campaign as campaign manager in 2004. He also staffed the Ohio Senate Environment and Natural Resources Committee performing certain administrative, parliamentary and policy work as the Committee Secretary.

TC joined a lobbying firm where he

represented and advocated on behalf of 30 clients before the Ohio Legislature on significant pieces of state policy from 2005 through 2007. He gained deep knowledge in higher education issues while representing several education clients before the Legislature.

TC has advocated for college students at Southeastern College and Keiser University and has successfully helped fund state grants for college students, while promoting proactive and beneficial policy initiatives which help create a friendlier environment for college students. He sits on the Board of the Associated Industries of Florida, as well as AMIkids Greater Fort Lauderdale.

Contact Information:

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education, labor and pensions, appropriations, veterans' affairs and armed services committees.

Identify the key decision-makers on each committee, usually the chairman, a vice chairman or a ranking member. The chairman, the vice chairman and a majority of the committee members are from the majority party and thus control the legislation, the calendar, and what, if any, amendments supported. Conversely, the ranking member is the most senior official from the minority party. This individual usually steers the opposition for his or her committee members.

These decision makers will have the most impact, as their committees have jurisdiction over most legislative issues affecting your students. It is helpful if you can conduct a little research and look through news articles, clips, YouTube videos and Facebook to find out what is important to these folks, and how familiar they are with your campus and private sector colleges and universities, in general. Each lawmaker's official website is a great place to start – learn about their positions, their district and what legislation they have sponsored or co-sponsored.

Each chamber has a hierarchy of leadership, from both major parties. Currently, the Senate has a Democratic majority, the majority leader and majority whip who help steer the Senate's agenda and the vote schedule; the minority leader and the minority whip are republicans. Conversely, the House has a Republican majority so the Speaker of the House, the Majority Leader, the Majority Whip and others steer the agenda and the vote schedule. The opposition is the house Democrats and their leadership includes the minority leader and the minority whip.

Figure out what is important to the person you are trying to speak with. Many elected officials have charities they support, many sit on boards of organizations or hospitals, and most have received awards from various organizations: associations of business, associations for health groups, veterans groups, realtors, the list goes on and on. Peruse these and see if any catch your attention.

After you have selected the members you want to communicate

Identify the Decision Makers

The House Education & the Workforce Committee

- John Kline, MN, Chairman
- Thomas E. Petri, WI
- Howard P. "Buck" McKeon, CA
- Joe Wilson, SC
- Virginia Foxx, NC
- Tom Price, GA
- Kenny Marchant, TX
- Duncan Hunter, CA
- David P. Roe, TN
- Glenn Thompson, PA
- Tim Walberg, MI
- Matt Salmon, AZ
- Brett Guthrie, KY
- Scott DesJarlais, TN
- Todd Rokita, IN
- Larry Bucshon, IN
- Lou Barletta, PA
- Joseph J. Heck, NV
- Mike Kelly, PA
- Susan W. Brooks, IN
- Richard Hudson, NC
- Luke Messer, IN
- Bradley Byrne, AL
- George Miller, CA, Senior Democratic Member
- Robert C. "Bobby" Scott, VA
- Rubén Hinojosa, TX
- Carolyn McCarthy, NY
- John Tierney, MA
- Rush Holt, NJ
- Susan A. Davis, CA
- Raúl M. Grijalva, AZ
- Timothy H. Bishop, NY
- David Loebsack, IA
- Joe Courtney, CT
- Marcia L. Fudge, OH
- Jared Polis, CO
- Gregorio Sablan, N Mariana Islands
- Frederica S. Wilson, FL
- Suzanne Bonamici, OR
- Mark Pocan, WI
- Mark Takano, CA

*List as of October 2014 (subject to change).

with, identify their appropriate staff. Some offices have upward of 60 staff – that is right 60 staff. Some offices list their staff on their website. Or you can go about it the old fashioned way by picking up the phone, and asking for the staff who handles education

Congressional office staff from Washington, D.C. will know the politics behind issues, and will have an idea for how fast or slow a legislative issue is moving through the process.

issues, or veterans issues – whatever the issue is.

Now you know whom to look for, where to find them, where issues impacting your students flow through. Let us write your plan!

You have to be realistic about how much you want to, or can get accomplished. Smaller campuses and colleges may only be able to work with a handful of elected officials; larger campuses or campus presidents of larger schools, with support staff, may be able to work with more. Your list should include those members of Congress and any of their relevant staff you want to meet with. Pick the campuses they should visit if you have multiple campuses and be sure to enlist the support of an employer, chamber of commerce or other third-party.

Begin the outreach; Call the district office of the congressman or congresswoman. Make self-introductions and provide a little background on your institution, your campus, particularly the one in their district, your student population, your areas of academic offerings and any other unique facts. Stay concise and invite the staff and the elected official to visit your campus to educate them about your students and college. Allow them the opportunity to reply to your invitation upon their review of the office

calendar. Do make sure you follow-up if you have not heard a response in a reasonable amount of time. The sheer volume of requests that are submitted into the office of a congressman or congresswoman is astoundingly high and sometimes requests get caught up. Consult the www.house.gov and www.senate.gov website for each Chamber's scheduled votes; during breaks like August Recess and other holiday-related breaks so you can plan accordingly.

Once you have a scheduled visit, ensure you know everything that you need to. You will want to arm each lawmaker and their staff with information that will assist them in Washington, D.C. Student outcomes are a hot-topic in Washington, D.C. these days. Provide them with graduation, retention, default and job-placement statistics. Inform them of what traditional and nontraditional students you have. Research comparison data from the Integrated Postsecondary Education Data System on other area colleges and universities. Let them know how many faculty and staff work at your college. Use the Association of Private Sector Colleges and Universities fact sheets by state, which can be found at <http://www.apscu.org/knowledge-center/facts/>. Provide student stories. Ensure they know how your college helps supply the talent for a globally competitive workforce.

An important tip! If you are asked something and you do not know the answer to it – simply say that. Do not guess or provide an answer that you are not one hundred percent sure of.

Another important tip! Always treat staff the same way you would the lawmaker. Often times, they are more familiar with the nuts and bolts of education issues, have read full pieces

of legislation and have more in-depth conversations with Committee staff for additional details that a lawmaker may not have. District staff has a good pulse on the district, the happenings, people's feelings and thoughts on things. Congressional office staff from Washington, D.C. will know the politics behind issues, and will have an idea for how fast or slow a legislative issue is moving through the process. Both are different in the areas of knowledge, but both are equally important. Consider yourself lucky if both visit your campus.

Figure out if you have an "ask." Think about all the comments and questions you hear from your students. Remember any unique stories you have heard from potential students during the admissions process. What is most important about students attending private sector colleges and universities and the institutions that provide this valuable education? This can be as specific as asking them to introduce a piece of legislation, or to vote no on an issue that harms your students. Be sure to make your ask, in person. Prepare yourself that you may not get an immediate answer, but be patient and keep working your plan. You can always conduct follow-up, supply additional information to help make your case and you can schedule subsequent meetings with your lawmaker or their staff.

What do you do if you did not have the information requested of you in the meeting? How do you communicate that to your lawmaker? Why is all of this important?

Follow-up is one of the most important pieces of maintaining a good relationship with those in public office and their staff. I mentioned earlier that they often

rely on sources of information. This is how you become that source. If there was information or a question

asked of you and you did not know the answer, find it. Make sure it is concise and provide a citation. You may

send this information to the staff who accompanied your guest of honor. You may also call the District office or the Washington, D.C. office and connect with the staff that handles education issues, or you simply can ask who in the office would be best with which to communicate. I want to underscore the importance of this – often times, constituents or those attempting to impact policy fall-off at this point in the relationship, and the consequence is that all credibility is lost. Ensure you remain credible.

APSCU is the national trade association of which many colleges within the sector are members. This organization is an important advocacy organization that colleges can utilize to assist in their efforts – and grassroots is no different. Many different resources exist within APSCU for you to utilize. Among the best is information on federal legislative and regulatory issues and facts on the sector, state-by-state information and economic impacts throughout the country. The most important for you, if you have any questions, is the "how to" guide. Find tips and useful information on how to host a campus tour, meeting with an elected office and how to find your elected official on the APSCU Advocacy Resource Center at www.career.org/policy-and-issues/grassroots/.

Every few years, legislation needs to be reauthorized by the Congress

Follow-up is one of the most important pieces of maintaining a good relationship with those in public office and their staff.

and signed into law by the President. Legislation like the Higher Education Act (HEA) and the Workforce Investment Act (WIA) impact our students in significant ways, and serve as the platform for ensuring our students have access to a quality education, progress through their higher education academics, and are assisted through the student aid program. The Congress has introduced pieces of legislation regarding both the HEA and the WIA; college students are still waiting for the bills to pass and be signed into law.

The November elections are right around the corner. The start of the new Congress is in January 2015.

APSCU Hill Day is in March 2015. There are too many issues for you and your students not to be involved in. Collect your inventory. Write your plan. Get active and invite your lawmakers to tour your campus and meet your students. Build the relationship. Travel to Washington, D.C. in March to visit your lawmakers at the Capitol. Utilize your relationships by affecting local politics to advocate for your college students, and better this country for college students all across the USA.





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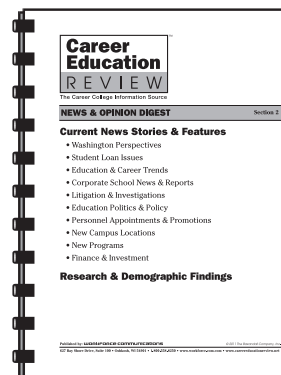
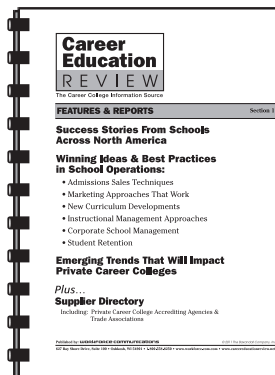
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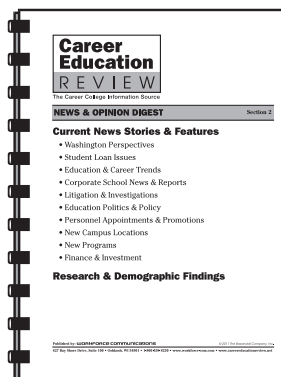
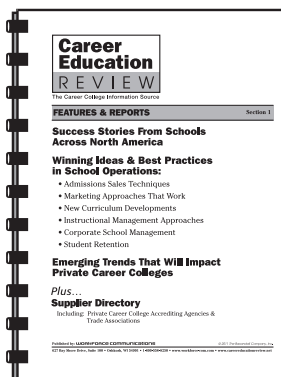
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