

Remarks as Prepared for Delivery by Anthony Bieda for ACICS to NACIQI

June 23, 2016

Thank You Dr. Leak.

Madam Chair, Member of the Committee, my name is Anthony Bieda. I have been serving since April as the executive in charge of ACICS, responsible for day to day operations of the agency, liaison relationships with the Department and state approval authorities throughout the U.S. and internationally, as well as the agency's relationships with member institutions and the nearly 800,000 students served by our accredited colleges and schools.

My background includes 15 years in telecommunications, eight years in county government, and 13 years in various assignments related to higher education administration, policy and accountability. I served as assistant county administrator in Lane County, OR before coming to ACICS; in that regard I had authority over 1,200 employees and an annual budget of in excess of \$400 million. I also served as primary legislative liaison for the Arizona Board of Regents; in that capacity I was instrumental in developing and publishing an accountability report card for the public University System in Arizona (UA, ASU and NAU, among the largest in the nation), that was shared with the public and the legislature. Some of the metrics we identified and memorialized in that report included graduation rates, drop-out/persistence rates, research grants, and the enrollment profile of in-state students. I helped these universities and their Board of Regents develop strategies for responding to and improving their scores on these metrics.

The purpose of my presence here today is to affirm and describe the capacity of ACICS to address the serious issues and findings of the Department. I'm here today to answer your questions, no matter how difficult those questions may be. Further, I am here to assure you about ACICS's ability to remedy the outstanding citations within the next twelve months.

ACICS was formed in 1912 by a group of private business college owners in the upper mid-west of the U.S. It has provided quality assurance to some of those institutions faithfully and effectively throughout the past 103 years. ACICS was first recognized by the federal government as a reliable authority on institutional quality and integrity in 1956, and has been

continuously recognized in that regard for the past 60 years. Three years ago, ACICS received re-recognition by the Department after providing a compliance report. In addition, I led the agency's effort for recognition by the Council for Higher Education Accreditation, and by the THECB, the NLNAC, and ARRT, within the preceding seven years.

ACICS colleges and schools include more than 800 campuses serving nearly 800,000 students in 47 states and 10 international locations. More than 40 percent of students enrolled in those institutions are pursuing credentials at the diploma, certificate or associate's degree levels; a typical ACICS campus enrolls about 500 students; the programs with the highest levels of enrollment include business administration, allied health professions, and information technology. While many ACICS Colleges and schools serve students in large metropolitan areas, a majority of the campuses are located in secondary or tertiary markets. In many cases, these schools are the only post-secondary institution within reasonable driving distance.

A substantial percentage of the students enrolled at ACICS colleges and schools are working adults; the majority of them are women; and very few of them are first-time, full-time students. These are schools that offer working adults the opportunity to make their lives better. We know, based on the Department's data that 74% of the undergraduates are Pell recipients and 55% are undergraduates of color.

Consistent with the practices of recognized accreditors, ACICS performs its review of the accreditation-worthiness of member institutions through a series of activities and procedures that deploy teams of evaluators and staff coordinators to each campus every three to five years. In addition, the campuses are subject to interim reviews by ACICS staff and evaluators for a variety of reasons, including quality assurance monitoring of substantive changes to these schools' programs or campuses, the receipt of adverse information from reliable third parties, and other reasons. In addition, ACICS collects and reviews from every institution each year student achievement data and institutional financial information. In short, ACICS campuses and programs expect and receive on-going in-person and remote monitoring of their effectiveness before, during and after the accreditation cycle.

Since our last recognition, ACICS understands that the expectations and requirements for re-recognition have changed substantially. The Under Secretary's April 2016 Letter to Federally Recognized Accrediting Agencies laid out the Department's new expectations regarding application of standards and institutional review processes, especially with respect to standards related to student achievement and institutions or programs with higher risk.

ACICS takes seriously the concerns about the need for greater accountability and transparency in higher education; these issues have been raised by external stakeholders, as well as the accreditation community. ACICS has listened to those concerns, participated in those discussions, and has and will continue to take decisive actions to improve the organization's effectiveness and fortify trust and confidence in the accreditation process.

Since I assumed my current position in April and with the support of Council, ACICS has initiated a series of decisive and immediate reforms that are in effect now and will bear fruit this Council cycle. ACICS has initiated the following: (slow down)

- Temporarily suspended the acceptance of applications for initial grants of accreditation.
- Implemented a number of policy changes at its May Council meeting that will strengthen the review of member institutions and fortify the principles of transparency and ethical conduct:
 1. A new data integrity standard that gives ACICS greater explicit authority to sanction programs and institutions that misrepresent their performance through self-reported retention, placement and licensure data.
 2. ACICS will review the institutions' written plans for recruiting and admitting students and test the degree to which the plan meets ACICS requirements and is being followed in practice.
 3. ACICS has strengthened enforcement activities by removing administrative barriers that inhibited ACICS from applying more timely and direct sanctions against underperforming schools.
 4. ACICS requires each campus to provide reliable student achievement data to the public and to prominently place on its website reliable, accurate and up-to-date student achievement information.

ACICS also established and deployed an at-risk institution group, with the explicit purpose of applying greater review of programs or campuses identified as having quality and/or integrity issues. That work group executed at least seven special visits to at-risk campuses in May and June, encountering immediate evidence that will be reviewed by Council in August, along with the institution's response, in order to make an informed decision about accreditation worthiness.

Also ACICS announced (June 3) a new Evaluator Development and Deployment initiative, beginning with the Fall 2016 travel cycle, that includes the following:

- Re-screening of the currency and relevancy of the individual credentials for each and every evaluator, specialist and team chair
- Successful completion of an enhanced evaluator training regimen, including new information regarding the admission and enrollment of student visa participants
- Signed attestation regarding avoidance of conflicts of interest and adherence to enhanced professional evaluator standards
- Recurring performance evaluations through an enhanced appraisal process.

We appreciate the critical role ACICS plays in reviewing the quality of education provided to students. We take great pride in the cadre of peer evaluators that ACICS sends to accomplish the peer review of education quality and effectiveness at member institutions. We believe our evaluators are uniquely positioned to make the qualitative assessments they are asked to make, because they are professional educators. And we know the Department appreciates the role the peer evaluators play in ensuring quality education, which is ACICS's primary mission.

Simultaneous with these initiatives, ACICS made procedural enhancements to the site visit review process, and implemented those enhancements immediately. Those enhancements include a dedicated data integrity reviewer for every site visit; a pre-visit survey of students, faculty and staff to identify risk factors and quality issues; and expanded narration in team reports, to enhance the quality and richness of information available to the Council for its review and decision-making in August.

Members of the Committee, Dr. Leak and I would like to be in front of you today with a recommendation for renewal of recognition and no finding of non-compliance as ACICS was the case in 2013. We are not asking for that; we fully appreciate the seriousness of the staff

recommendation. In this regard, ACICS recognizes that the Department's interpretation, application and required documentation of compliance with such rules have changed significantly since 2013.

In fact, the sheer volume of documentation requested by the Department in its final recommendation requires more time for ACICS to respond. ACICS previously requested an extension to respond to the Department's draft report in order to make or document all of the changes in policy and standards required by the Department's new interpretations of the regulations, apply them in a systematic and recurring manner to member institutions, and collect and provide evidence.

We want to thank Mr Porcelli for his candor and his concerns throughout this process and we also want to thank Mr. Bounds for his guidance. For better or worse we have become the subject of intense political and public scrutiny and we believe many of the public comments directed to ACICS are not well founded for reasons we have articulated throughout this process. We invite and remain open to candid conversations with any and all parties. However the real issue today, we believe, is the issue of whether we can come into compliance within one year (or sooner).

We have studied the staff report with great care and with many of our commissioners, who are here today, and we sincerely believe that we can solve and address the legitimate issues the Department has flagged. We do not say this lightly and we take the Department's concerns very seriously. As you can tell from Dr. Leak's comments we have already made much progress although it will take some additional time to demonstrate the effectiveness of our actions. We welcome your continued input as we move forward.

(Only two of the findings express skepticism about our ability to meet the recognition criteria in a timely way?)

We are committed to continued progress on the initiatives underway, and ACICS will employ whatever resources necessary to address and resolve these concerns. We only ask that we be given that opportunity to come back before you fully compliant within one year or less.

Thank You.

With your permission, I would like to go through a brief summary of our plans to demonstrate full compliance with the 21 requirements within one year.