

NATIONAL ASSOCIATION OF SCHOOLS OF ART AND DESIGN

75th Annual Meeting

October 16 – 19, 2019

Report of the Executive Director

The 2019 – 2020 academic year marks NASAD’s 75th season of service to its members and to the field. Efforts to support and advance art and design professions in the United States remain at the core of the Association’s projects. Its work in various areas, including accreditation, professional development, research, and monitoring and analyzing policy surrounding higher education and the arts, is continually being reviewed, discussed, improved, and enhanced. As NASAD serves an ever-growing and diverse membership, its projects in accreditation and beyond continue to broaden and evolve. The Association’s principal activities during the past year are presented below.

Accreditation Standards and Procedures

Much of the yearly work of NASAD involves accreditation. This includes preparation for meetings of the Commission on Accreditation; scheduling accreditation visits; arranging consultations for member and potential member institutions; communicating with institutions preparing accreditation materials; receiving and reviewing accreditation materials; and reviewing and developing standards, guidelines, resources, and educational programs in support of the accreditation review process. All individuals involved in these activities—including institutional representatives, faculty and staff members, NASAD Commissioners, visiting evaluators, consultants, presenters, and National Office staff members—work to make this service a valuable component in the advancement of art and design programs in institutions of higher education.

In August 2015, NASAD announced its intention to begin a multi-year comprehensive review of its standards. This process, now underway, is intended to focus on the standards currently found in the *NASAD Handbook*. In Fall 2015, NASAD began this review by opening consideration of its graduate standards; the review of undergraduate standards began in Fall 2016; non-degree-granting standards in Fall 2017; and operational standards, standards for two-year degree-granting programs, and applicable appendices in Fall 2018. Continuing its multiyear review of accreditation standards, in August of 2019 NASAD began a review of the two remaining sections of the *Handbook*: Specific Operational Standards for All Institutions of Higher Education for which NASAD is the Designated Institutional Accreditor and Specific Operational Standards for Proprietary Institutions of Higher Education. Mailings, which included the text under review and instructions regarding the submission of comments, were distributed to accredited institutional members including administrators, faculty, staff, and students; non- and potential member institutions; the higher education community including regional, specialized, and national accreditors; related organizations and associations; and the general public. Although particular focus is devoted at this time to the specific standards under review, the standards as a whole remain open for comment. This is particularly important, as there are relationships between and among standards. Consideration of these relationships will be included in review conversations, and used to inform ongoing and later phases of the comprehensive review process.

Subsequent to the comment period, NASAD will hold an Open Hearing during its 75th Annual Meeting in Pittsburgh, PA. Feedback collected during the open comment period, as well as that collected during the Open Hearing, will be reviewed by the National Office staff and considered as appropriate by the applicable bodies within NASAD. Individuals should feel free to contact the office of the Executive Director at any time if views are held that would assist the Association in this review process and its ongoing work.

An amended *Handbook* typically is released annually just after each Annual Meeting. The *NASAD Handbook 2019–20* is expected later this fall. *Handbooks* released just after Annual Meetings include any standards changes approved by the membership, Board of Directors, and/or Commission as appropriate during the most recent

meeting, as well as any amendments approved between Annual Meetings. Official notices regarding the proposed revisions to the *Handbook* were disseminated on August 5, 2019 and September 16, 2019. Following these two open and public official comment periods, the proposed revisions are slated for a vote by the Membership during this Annual Meeting.

All current accreditation-related documents, standards, and procedures are available for download from the Association's website at <https://nasad.arts-accredit.org>. Institutions are reminded that the NASAD framework does allow for flexibility in approach. To discuss available flexibilities that can assist to address local conditions and realities, and for assistance in using the various *Procedures* documents and *Handbook*, please contact the NASAD National Office staff.

The Association continues to encourage consideration of the use of the NASAD review process or materials in other review contexts. Consolidating reviews may assist institutions to conserve resources and realize economies of scale. Many institutions are finding efficiencies by combining the NASAD review with internal and/or other external reviews. The Association is willing to work with institutions and programs to consider options and to craft NASAD reviews that are thorough, efficient, and suitably dovetailed with other internal and external efforts.

The Association is cognizant of the many hours devoted by member and applicant institutions to research, study, consider, prepare, and present accreditation materials for review by the Commission on Accreditation. NASAD is deeply grateful for these efforts on behalf of the field of art and design and congratulates the institutions and their representatives for the many accomplishments and successes resulting from their work.

Projects

NASAD participates in the Council of Arts Accrediting Associations (CAAA) with NASD (dance), NASM (music), and NAST (theatre). The Council is concerned with issues that affect all four disciplines and their accreditation efforts. NASAD President Jeffrey D. Nesin and Vice President Sally McRorie are the art and design Trustees of the Council, and represented NASAD during CAAA meetings held in January 2019. CAAA sponsors the Accrediting Commission for Community and Precollegiate Arts Schools (ACCPAS), which reviews arts-focused schools at the K–12 level. Currently, there are 17 institutions accredited by ACCPAS. This undertaking is valuable in that it assists to connect precollegiate and higher education efforts. Rod Parker is the art and design appointee to ACCPAS.

The Higher Education Arts Data Services (HEADS) Project continues to be refined and improved. Participation by member and non-member institutions remains strong. Following the close of the information gathering process facilitated by the 2018 – 2019 HEADS Data Survey on January 31, 2019, the resultant Data Summaries were published in April 2019. Additional capabilities and services are added as time and financial resources permit. Periodically, minor adjustments to the Data Survey are made that are intended to clarify the submission process, thus ensuring the collection of accurate and helpful data. Data Survey changes typically are followed by associated changes to the Data Summaries. Comparative data in the form of Special Reports are a feature of the HEADS system and can be valuable resources for administrators. These Special Reports and their possible uses will be discussed during an Annual Meeting session and can be discussed at any time with staff in the National Office. NASAD welcomes thoughts and feedback regarding the HEADS Project.

The NASAD Annual Meeting provides various opportunities for the discussion and dissemination of current information surrounding art and design study, higher education, administration, and other related fields. A large number of individuals participate in the Annual Meeting program each year, producing sessions that offer helpful and thought-provoking ideas. The 2019 Annual Meeting will include a full afternoon devoted to the topic of student success with ample time for sharing and discussing opportunities, approaches, and solutions. Attendees will also take time to imagine the future of art and design education as it relates to external partnerships and curricular planning. Other topics of focus will include mergers and acquisitions; game design; accessibility; and establishing buy-in and engagement. Roundtables and discussion groups will be held, as will several informational sessions for individuals guiding their institutions through the accreditation/reaccreditation process. Training opportunities will

be offered for potential and experienced visiting evaluators. Informative sessions addressing NASAD annual reporting requirements, administrative resources, and federal issues for art and design administrators will also be offered.

NASAD continues in 2019 its long-standing tradition of offering a Pre-Meeting Workshop for New and Aspiring Art and Design Administrators in Higher Education. This workshop is well attended each year, and highly recommended by those who have participated. Additionally, NASAD offers a Pre-Meeting Workshop for Seasoned Administrators. This workshop provides registrants the opportunity to discuss in detail those current and salient issues faced by today's art and design administrators.

The Association is pleased to welcome each registrant and is grateful to all those who developed specific agenda material for the Pre-Meeting Workshops and Annual Meeting, as well as those who volunteered to serve as moderators and recorders.

Policy

The Association continues to follow and monitor carefully various federal and state initiatives and issues.

Activity regarding reauthorization of the Higher Education Act (HEA) began in late 2017. This Act was last reauthorized in August 2008 and expired December 31, 2013. Issues of concern include initiatives pertaining to gainful employment, state authorization, teacher preparation, and misrepresentation. Joining this list are issues such as access, cost and completion, new pathways for collegiate study, student achievement, institutional responsibility, borrower defense to repayment, and institutional obligations under Title IX. With the arrival of the 116th Congress, current House Committee Chair Bobby Scott (D-VA) and Ranking Member Virginia Foxx (R-NC) announced a series of hearings as part of a formal effort to reauthorize the HEA during the 116th Congress.

The Senate Committee on Health, Education, Labor and Pensions (HELP), chaired by Lamar Alexander (R-TN), is attempting to reach bipartisan agreement on many of the issues during the bill writing process and has held a variety of hearings throughout 2018-19 regarding reauthorization. Chair Alexander has announced his upcoming retirement and desire to reauthorize the HEA prior to his departure from Congress. In late September of 2019, Senator Alexander introduced a bill intending to update a number of existing provisions of the HEA.

It is important to recall that this Act governs the flow of federal monies earmarked for higher education.

As a reminder of past activities and events, following the release of final regulations in 2016 pertaining to state authorization, teacher preparation, and borrower defense to repayment, in 2017 these regulations were subsequently placed on hold by federal action. In July and August 2018, following delays of the implementation of recently approved rules related to borrower defense to repayment and gainful employment, the Department of Education announced a variety of new comment periods and plans to rewrite or rescind various regulations. In July 2018, the Department of Education announced the intention to form a negotiated rulemaking committee and requested comment regarding regulations related to the Secretary's recognition of accrediting agencies. The Department included in the notice information of significance indicating that in addition, the committee would be tasked with reviewing federal definitions and requirements related to state authorization, the definition of "regular and substantive interaction" as it relates to correspondence and distance education, the definition of the credit hour, and direct assessment programs and competency-based education. Also in July 2018, the Department of Education issued a Notice of Proposed Rulemaking (NPRM) requesting comment related to federal standards concerning the evaluation of applications related to borrower defense to repayment. In August 2018, the Department of Education issued a NPRM requesting comment concerning the Department's proposal to rescind regulations related to gainful employment. In October 2018, the Department of Education issued its intention to establish a negotiated rulemaking committee to address issues pertaining to accreditation, distance learning, TEACH grants, and faith-based educational entities. Relatedly, in December 2018, the Department of Education released two documents with an intention to guide future policy proposals entitled, "Rethinking Higher Education"

and “Rethinking Higher Education: Accreditation Reform.” Negotiated Rulemaking sessions on policy proposals noted in both documents began in January and continued through the end of March 2019. On June 12, 2019, the Department of Education released a Notice of Proposed Rulemaking regarding the possible amendment of regulations applicable to institutions that participate in Title IV federal financial aid programs, governing the recognition of accrediting agencies, certain student assistance general provisions, and institutional eligibility as they pertain to the HEA. The proposed revisions are extensive and, if approved, will go into effect July 1, 2020. NASAD will closely and carefully monitor any changes to these proposed regulations. In July 2019, the Department of Education announced new gainful employment regulations, thus rescinding prior gainful employment regulations entirely. Although the previous gainful employment regulations remain in effect until July 1, 2020, the Department of Education is offering to institutions the ability to implement the new regulations immediately. Institutions that elect early implementation are not required to comply with the requirements of the prior rule. In August 2019, the Department of Education announced final regulations regarding borrower defense to repayment applicable to all federal student loans made on or after July 1, 2020, replacing the 2016 borrower defense to repayment rules.

In addition to activities related to the Higher Education Act, heightened activity affecting institutions of higher education appears to be widespread in various federal departments and entities.

In September 2017, the Department of Education 1) rolled back Title IX guidance, specifically, previous guidance offered in the 2011 “Dear Colleague” letter and the 2014 Question/Answer set; 2) issued interim guidance pertaining to Title IX; and 3) published notice of its intent to negotiate regulations pertaining to Title IX. An NASAD notice was sent regarding the November 2018 Department of Education release of a Notice of Proposed Rulemaking. This Notice requested comment regarding proposed regulations related to Title IX. It remains to be seen what changes will result from these actions.

On July 3, 2019, The Department of the Treasury published proposed regulations intended to clarify statutes in the Tax Cuts and Jobs Act regarding the excise tax applicable to the net investment income of private colleges and universities meeting certain thresholds. Although previous interpretations of the law specify a 1.4% excise tax on investment income, the proposed regulation specifically defines “qualified tuition and related expenses” and its exemption from the tax in order to require that the tax apply to gross amounts of income from interest, dividends, rents, royalties, and capital gain income from all sources other than those directly used by the institution in carrying out its exempt purpose. A comment period on the proposed regulations closed on October 1, 2019.

On September 23, 2019, The National Labor Relations Board (NLRB) published a notice of proposed rulemaking and request for comments related to the National Labor Relations Act that would establish that students, both undergraduate and graduate, who perform any services for compensation in connection with their studies at private colleges or university are not “employees” as defined within Section 2 (3) of the Act. As part of the notice of proposed rulemaking, the National Labor Relations Board is also seeking comment on whether the rule should also apply to students providing services to their institution in a capacity unrelated to their course of study. The comment period on this issue closes on November 22, 2019.

On September 27, 2019, the Department of Labor published final regulations regarding exemptions from minimum wage and overtime pay requirements as related to the Fair Labor Standards Act. Following various stops and starts from previous rule publications, this new rule, effective July 1, 2020, increases the salary level for those eligible for overtime pay from \$455 per week (\$23,660 per year) to \$684 per week (\$35,568 per year). While the Department of Labor previously noted that professors, instructors, and adjunct professors would be exempt from salary requirements, institutions may wish to study the regulations as they may affect support staff and administrators.

There is no doubt that the federal landscape associated with higher education has changed dramatically during the past year and continues to change. Members and colleagues should remain abreast of unfolding activities, study federal writings, and offer feedback pertaining to federal requests and proposed regulation. Concerted effort is needed to ensure that neither law nor the regulation that follows restricts the academy from designing and

implementing effective programs of study. Protecting and maintaining institutional autonomy and freedoms vital to the success of our educational system, as well as our pursuit of creative and innovative undertakings, remains paramount.

NASAD currently publishes advisories that describe regulations associated with the current 2008 reauthorization of the HEA. These *Advisories on Federal Issues* may be found within the Publications section of the website, and are intended to provide helpful summary information. Review is highly recommended.

In addition to accreditation policy mentioned above, the Association remains concerned about implications of tax policy, intellectual property rights, the preponderance of data collection and associated issues of privacy and confidentiality, copyright and public domain, the disparity in educational opportunity at the K–12 level, and the pace of cultural climate changes enabled by technological advances and their impact. Many contextual issues that affect NASAD institutions grow out of large social forces that can be understood, but not influenced significantly. Economic cycles and downturns have a profound effect, but no single person or entity controls them. NASAD continues to monitor policy discussions regarding deductions for charitable contributions on federal income tax returns. Increasing personal philanthropy is a critically important element in future support for education and the arts, particularly in these fluctuating economic times. As well, NASAD keeps a watchful eye on proposals that would bring increased federal involvement in the activities of and control over non-profit organizations and philanthropies.

NASAD will continue to monitor ongoing events, actively participate in the conversations that address such issues, assist to provide detailed and thorough information, and keep the membership informed as issues and projects progress.

National Office

The NASAD National Office is located in Reston, a Virginia suburb of Washington, DC, and the current terminus of Metro’s Silver Line. The office is about eight miles east of Dulles International Airport, and approximately 20 miles from downtown Washington. We are pleased to welcome visitors to the National Office. Should your travels bring you to the area, please feel free to schedule an appointment with a staff member, or merely stop by for a visit.

The primary purpose of the National Office is to operate the Association under rules and policies established by the membership, the Board of Directors, and the Commission on Accreditation. Its strength rests in its peer governance operations and its peer review efforts. The work of the Association is carried out by many volunteers—elected officials, evaluators, and meeting participants—all willing to donate their valuable time and expertise, all holding and exhibiting unwavering commitment to the field. Although the availability of each member’s time becomes ever more precious, NASAD continues to seek volunteers and enlist their assistance in the work of the Association. Such acts of support and volunteerism in NASAD are a testament to the extraordinary spirit and dedication of its members. The work of our visiting evaluators and Commission members is an exemplary expression of our collective commitment to our field and faith in its future.

This outstanding corps of volunteers is joined by a dedicated and capable National Office staff—Stephanie Blakely, Adèle-Marie Buis, Paul J. Florek, Nora Hamme, Ben Karnes, Jenny R. Kuhlmann, Kyle D. Johnson, Tracy L. Maraney, Stacy A. McMahon, Lisa A. Ostrich, and Kristin Stowell. To support the work of accredited institutional members, the work of the staff and the services to NASAD over the years have grown. Staff is focused on carrying out the daily work of the Association, developing new and refining old systems, assisting institutions seeking accreditation for the first time, and consulting with those seeking renewal of Membership. The staff is diligent in its efforts to assist and serve the institutions, and to carry out the responsibilities of NASAD effectively.

As a staff, we are able to see on a daily basis the great foundational strength of NASAD. Fundamental to this foundation is wisdom about the need to remain informed, communicate, and work together to build art and design in higher education as a whole, as well as in each member and applicant institution. NASAD has realized great success in maintaining its focus on issues of importance to institutions and the field, and in working to

address these issues. It promotes collegial connections and centers its work on concepts, conditions, and resources necessary for competence and creativity. This foundation, now strongly in place, will serve NASAD well as it faces changing and challenging times ahead.

The staff joins me in expressing appreciation for the support, cooperation, assistance, and kindness extended by the NASAD membership. It is an honor and a privilege to have the opportunity to serve NASAD, its member institutions, and constituencies. We hope you will always feel free to contact the staff whenever you think we may provide assistance. We look forward to continuing our efforts together.

Please accept our heartfelt appreciation and best wishes as you continue your work throughout the year.

Respectfully submitted,

Karen P. Moynahan
Executive Director