May 2020 Membership Update

May 26, 2020

https://www.msche.org/covid-19

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Welcome to the May 2020 Membership Update with the Middle States Commission on Higher Education. Your presenters for today include:

Dr. Elizabeth Sibolski, President
Dr. Heather Perfetti, President-Elect
Dr. Stephen Pugliese, Senior Vice President and Chief of Staff
Dr. Ellie Fogarty, Lead Vice President
Dr. Sean McKitrick, Vice President – and –
Dr. Christy Faison, Senior Vice President for Accreditation Relations

Dr. Sibolski will begin with remarks.
Dr. Elizabeth Sibolski, President

Greetings from the Middle States Commission on Higher Education. This is Elizabeth Sibolski, current President of the Commission. I want to welcome you to another broadcast that has been developed in order to share up-to-date information about accreditation-related matters. During the broadcast, members of the MSCHE staff will address new U.S. Department of Education regulations that become effective on July 1, 2020, changes that have been implemented to allow for accreditation activities to continue under the challenging conditions of our COVID-19 environment, and the MSCHE plans going forward into the 2020-2021 year. We hope that you will find the information provided in this format to be helpful.

Many of you know that I will be retiring at the end of June, and I want to take this opportunity to thank so many who have contributed so much to the MSCHE accreditation effort over the years that I have been fortunate to be with this organization. The knowledge and expertise that you have so willingly shared has certainly served as the very foundation of our system of peer review.

Dr. Heather Perfetti currently serving as the Commission’s President-Elect will become President on July 1, 2020. She has been with the Commission for some time, and her early selection as our next President has allowed for what I believe will be a seamless transition. And now, please welcome Dr. Perfetti for the next portion of this broadcast.
Hello, and thank you for listening to this recording shared on behalf of the Middle States Commission on Higher Education. I am President-Elect Heather Perfetti, and I would like to spend a few minutes to offer my thoughts and provide some highlights specific to the July 1, 2020 regulations. I will then turn this over to my colleagues who will provide information about upcoming events as well as important updates relating to the Commission’s response to the coronavirus (COVID-19) pandemic.

As Dr. Sibolski conveyed, the Commission continues to recognize the challenges resulting from COVID-19 for the higher education community and the exceptional ways that our institutions have risen to these challenges. You will hear about the work of our institutions later in this broadcast.

To our institutions: Thank you for the care that you have demonstrated to address issues of equity, access, and student support while moving instruction online. We have appreciated your responsiveness to the Commission, your keeping us informed, and your exceptional work. That, coupled with the waiver of our policies and procedures to promote the flexibility that you needed at this time, has demonstrated the value of our partnership and how best to live our missions to serve students and the greater good of higher education.

To our evaluators: You have continued to contribute in amazing ways during these difficult weeks, and we appreciate your commitment to peer review during such personally and professionally challenging times.

To each of our Commissioners and the MSCHE staff: I am immensely appreciative of all that you do and all that you have given, each and every day, during these challenging and unprecedented times.

We will come back to the COVID-19 updates; however, first, I will provide remarks about the regulations going into effect on July 1, 2020.

As most of you know, the regulations had been published on November 1, 2019 following consensus through negotiated rulemaking; both Barbara Gellman-Danley, President of the Higher Learning Commission, and
current president of the Middle States Commission on Higher Education Dr. Sibolski, were involved in the negotiated rulemaking process representing the regional accreditors.

Throughout the negotiated rulemaking process, our Policy and Regulatory Units had been tracking the issues, which allowed us to explore how we may respond to any of the issues that carried through the process. Since the publication of the final regulations in November, and in preparation of the July 1, 2020, effective date, our Commission has been processing the impact of the regulations on the work that is done in our region, or what may need to change in Commission policies or procedures, or elsewhere. Our Commission held a retreat in November 2019 to talk about high-level policy issues resulting from the regulations, and we have been processing several changes as a result. It is important to note that some of the regulatory language is discretionary whereas in other areas the language is mandatory.

Perhaps the piece of the new regulations that received the most attention was the elimination of the reference to regional accreditors and its replacement with the reference to institutional accreditors.

For those of you who may be unaware, there are seven regional accreditors affected by this shift, including us. What the new regulations have prompted is for each regional commission to independently consider the implications and either determine that the geographic boundaries will no longer define its work or do nothing and continue to operate based on its defined regional boundaries. While the reference to the term regional has disappeared from the regulations, each Commission may still define its work regionally … nothing in the new regulations require that accrediting agencies broaden their scope or reach.

Our Commission is currently determining the best course of action and has been evaluating its options. It is important to note that for our Commission, we are currently operating quite extensively throughout the country, in U.S. territories, and internationally. You may not realize, for example, that the Middle States Commission on Higher Education had already been a global enterprise, conducting business in 48 states, two U.S. territories, the District of Columbia, and 94 countries, when you consider all main campuses, branch campuses, additional locations, and instructional sites. For that reason, we do expect our Commission to consider this issue as may be appropriate under the changing regulations, and that will occur at their upcoming meeting in just a few weeks.

By far, the most significant changes under the new regulations, and those most likely to impact institutions, are in the areas of substantive change. The regulations support the further refinement of a risk-based approach to changes at institutions, and our Commission has considered and endorsed a modified model under its policies and procedures based on the new regulations. Tiers will place the substantive change evaluation process across five levels, with the lowest level reflecting notifications to staff, resulting in staff recording of the substantive change, while other tiers will still require a review process with peer evaluators and Commission action. You will see this in the draft Policy document that has been shared with institutions and the public for comment as well as in the updated Procedures document which provides steps for institutions to manage substantive change requests after July 1, 2020. It is important to note that while the regulatory environment may have shifted, the Commission is not absolved of its responsibility to understand institutional activities in the way that our Commission deems important and appropriate as an accreditor.

Another regulatory option that is noteworthy pertains to the potential for a longer non-compliance period, which our Commission has already considered. The Commission has agreed to change its policies and procedures and permit a three-year non-compliance window for institutions out of compliance, moving from the current two-year non-compliance period. This is in recognition that some issues may take longer to resolve, which the negotiators and ultimately the Department recognized under the new regulations. However, it is important to note that this reflects a potential period of time for non-compliance, as the Commission retains the authority to require an institution to show cause at any time, at which point the Commission can withdraw accreditation. What does this mean practically? It means that institutions will now have a three-year initial non-compliance period, although the Commission may withdraw accreditation before the expiration of this time period. It also means that under certain circumstances, because the Commission can opt to extend a non-compliance period for
good cause, the Commission’s total non-compliance period has shifted from four years to five years, when an institution can demonstrate it needs and deserves extra time.

One other change should be highlighted, and this pertains to the option for agencies to provide a retroactive date of accreditation for new institutions. Retroactive provisions allow for accreditation to pre-date an institution’s initial accreditation and can have benefits for students who graduate from those institutions at a time when the institution was only a candidate for accreditation, without the benefit of initial accreditation. Retroactively dating accreditation can help facilitate transfer and licensure opportunities and offers a benefit to institutions and their students not previously afforded. The new Application and Candidacy Review Cycle and Monitoring Policy and Procedures will be launched with this in mind.

The final regulatory change that I will mention is not necessarily one felt by institutions, but it does impact the work of accreditors. The process by which accreditors are recognized through the Department is changing. Yes, just like our institutions, accreditors also have to go through a review. Accreditors will see some changes to the processes used to evaluate us. Some brief highlights of those changes include a different cycle for the submission of information tied to the petition, a different on-site experience with the Department’s staff analyst who will have broader access to Commission files during the visit with us, expanded site visits, and the restored requirement that the Commission be in substantial compliance with the Department’s regulations. Again, these are changes that each Commission will need to manage, and they will not necessarily be seen or felt by the institutions we serve.

Rest assured that we have been busy preparing for the regulatory impact. We will continue to push communications out to institutional representatives about the changes, and we ask the following of our institutions:

1. Keep your institutional key contacts in our portal up to date. This is how we will be conveying important information to you.
2. Lean on your institution’s assigned Vice President Liaison with the Commission when you need help understanding the new regulations or any of our changes in policies and procedures.
3. Look to your institution’s Accreditation Liaison Officer (ALO) to get the information that you need from us.

Like our institutions, we are trying to make sense of what the future looks like due to the coronavirus (COVID-19) pandemic. We will be collecting more information from you about your experiences with and responses to the pandemic. We are planning for the Annual Conference but know we must think about alternatives. We too have several financial plans and models that vary and are dependent on so much that remains unknown. We need to continue to implement the planned changes for July 1, 2020, including the implementation of our new dues and fees model. Institutions will receive separate messaging as they receive invoices for the new fiscal year. We had a number of exciting, new initiatives planned, but we too are making the necessary shifts with regard to budget adjustments, including hiring freezes, while finding efficiencies and leveraging technology. Please plan on engaging with us through our events and follow up with us when you have questions or concerns. I want to reiterate that it remains my privilege to become the Commission’s president on July 1, 2020, and despite the challenges we all face, we are in this together – and we will get through this together.

I want to thank those whose contributions follow these remarks, as the staff are responding to the daily challenges in what is now the new-normal for the higher education community. I now welcome Dr. Stephen Pugliese, Senior Vice President and Chief of Staff, to provide important updates.
Events Updates
Policy Updates
MSCHE Rebranding Updates

Dr. Stephen Pugliese, Senior Vice President and Chief of Staff

Thank you Dr. Perfetti. Before we discuss COVID-19 and the Commission response and learning related to accreditation and institutional activities, I wanted to take a few minutes to talk about what the Commission has been working on to provide the necessary support for our institutions as we prepare for the return of a new academic year.

Events: In order to respect the various federal, state and local restrictions during the pandemic, the Commission has decided to go virtual with our workshops and town halls beginning in June 2020.

The first of these events is the June 11 optional webinar Federal Regulations and Changes to MSCHE Policies and Procedures. This webinar will expand greatly upon the updates that Dr. Perfetti just provided as staff take a deep dive into the upcoming changes to federal regulations effective July 1, 2020, and the impact on MSCHE policies and procedures. During the webinar we will relay how the Commission expects to align MSCHE policies, procedures, and guidelines with federal regulations, and provide updates on other policy changes resulting from the Commission’s regular policy review and development process. The event is scheduled on June 11, 2020, from 10:00 am to 3:00 pm. Registration for the event is still open and the fee is $175.

In addition, the Commission staff are working on a fall 2020 virtual workshop series. At present, topics include assessment and alignment with planning, the use of data, and institution governing boards. As always if you have a particular workshop you would like to see offered, please contact training@msche.org.

As we have been doing these recorded updates to inform you about everything COVID and accreditation, we will continue updating you with our planned Town Hall in the fall, but with a virtual twist. As you are aware, Dr Perfetti will assume the role of president on July 1, 2020. She along with Senior Vice President for Accreditation Relations Dr. Christy Faison and myself will share updates from the Commission, answer questions from institutional representatives, and engage with presidents and provosts on a variety of topics. The focus of the Commission’s updates will be the state of the Commission and its membership following the coronavirus (COVID-19) pandemic, the regulatory changes effective July 1, 2020, and the strategic priorities.
and vision for the Commission under its new leadership. More details about registration will be distributed to key contacts and posted on the website soon. But please do save the following dates and times.

- September 15, 2020 – 1 pm to 3 pm: Virtual President-Provost Meeting
- September 21, 2020 – 10 am to 12 noon: Virtual Town Hall

The Commission continues to plan for the MSCHE 2020 Annual Conference: Learning from Change and Bringing the Future into Focus from December 2-4, 2020, in Philadelphia, PA. We are sensitive of the unpredictable and challenging higher education situation our institutions are facing, and we are exploring multiple scenarios and strategies for how to hold this Conference. That said, on behalf of the Commission we thank all who submitted proposals for concurrent sessions. At the close of the call we received 89 proposals, so thank you. All proposals are under review by the Conference Planning Committee and we will communicate in mid- to late June on the status of each proposal with those who submitted.

I now want to shift to a few policy and procedure updates.

**Call for Comment:** It is that time of year when we typically reach out to our institution key contacts around a variety of accreditation activities where we welcome comments. Recently you received a call for comment for institutions on the Commission’s policies and procedures, your input is critical to policy development. Several policies and procedures will be distributed to institutional members in the coming weeks. While many changes are based on the federal regulations published on November 1, 2019, and effective July 1, 2020, other changes that you will see have resulted from the Commission’s regular review of its policies and procedures. If you have already provided us with comments, thank you.

**Rebranding:** As I’m sure you have noticed, MSCHE rolled out new branding earlier this year that included a refreshed logo. In March, institutions received a communication from Mr. Brian Kirschner, Senior Director for Communications and Public Relations, requiring institutions to update their websites with the new logo and all other materials referencing an institution’s accreditation status with MSCHE by July 1, 2020. In addition, institutions were asked to make sure any statement or reference to an institution’s accreditation status is accurately represented.

The use of the MSCHE logo is outlined in the *Public Disclosures Policy and Procedures* as well as in the *MSCHE Logo Usage Guidelines* which includes greater flexibility for using the MSCHE logo by member institutions. Both are found on the policy section of the MSCHE website.

If you have any questions, please do not hesitate to email Mr. Kirschner at communications@msche.org.

**Call for Commissioner Nominations**
The call for commissioner nominations has been extended to June 30. We are seeking nominations specifically for faculty representatives and public representatives. Please visit our website for more information. I would now like to introduce Dr. Ellie Fogarty, Lead Vice President for Institutional Field Relations.
Virtual Site Visits and Delays

Report Due Dates

Fall Visits and USDE Guidance

Distance Education and USDE Guidance

Annual Institutional Update Launch

Dr. Ellie Fogarty, Lead Vice President

Thank you, Dr. Pugliese. Hello, this is Ellie Fogarty, Lead Vice President for Institutional Field Relations

**Virtual Site Visits and Delays:** As we reported in March, the United States Department of Education (USDE) issued guidance allowing virtual site visits, and the Commission offered this option, or a delay, to 50 institutions with evaluation visits and follow-up visits in Spring 2020. Institutions considered their technological capability to host a virtual site visit and consulted with team members about their availability to continue with a virtual site visit. Hosting virtual site visits was not offered to applicant institutions, institutions on probation, or under certain circumstances where the nature of the Commission’s concern necessitated on-site review.

The Commission developed training for institutions and peer evaluators, which has been viewed over 180 times to date. Ten evaluation visits and 5 follow-up virtual site visits will be completed by June 30, 2020. Not all institutions were able to host virtual site visits and the Commission granted delays for 35 Spring 2020 visits.

We recognize that the transition to virtual site visits was not easy. We are grateful to our institutions and teams who needed to quickly adapt to this new modality all while maintaining the highest level of commitment to the peer review process. Feedback has been positive and the virtual site visits have been described as meaningful, robust, collegial, and conducted with integrity.

**Report Due Dates:** As the crisis continued to put pressure on our institutions, staff sought approval from the Commission to adjust future reporting deadlines for follow-up reports, including focused, supplemental information, and monitoring reports. Reports due May 1, 2020, could have been rescheduled for October 1, 2020, while reports due September 1 or October 1, 2020, are now due by December 1, 2020. Changes in due dates are noted on the institution’s Statement of Accreditation Status (SAS).

**Fall Visits and USDE Guidance:** The USDE recently extended the flexibilities provided in the March 17, 2020, guidance permitting accrediting agencies to conduct virtual site visits through December 31, 2020 and provided clarification for the required follow-up on-site visits that must follow a virtual site visit. The
Commission considered various scenarios for fall 2020 visits in light of public health advice, the variability of situations on the ground throughout our membership area, and the health and safety of our peer evaluators, institutions, and staff and determined that virtual site visits will continue through December 31, 2020 for eligible institutions. The next steps include contacting member institutions with fall 2020 visits to provide additional information, updating our virtual site visit training with feedback and insights from institutions and peer evaluators who hosted and conducted virtual site visits this Spring, and developing procedures for the required follow-up, in-person visits to distribute to institutions and evaluators. Those excluded from virtual site visits, as they were for Spring 2020 visits, will be applicant and candidate institutions, institutions on probation, and institutions for which the Commission’s concerns necessitate on-site review.

Self-Study Preparation Visits (SSPV) and Commission Directed Liaison Guidance Visits (CDLGV) will be conducted virtually through December 31, 2020. Substantive Change Follow-Up Visits will take place when travel is permissible.

**Distance Education and USDE Guidance:** In accordance with the United States Department of Education guidelines that were published March 5, the Commission was able to grant temporary waivers to 173 institutions to deliver programs by distance education. Although the USDE guidance extended through June 1, 2020, we soon heard from institutions planning alternative summer and fall plans that would include the continued use of distance education modalities. Even as we advocated for and anticipated an extension from the Department, Commission staff developed and announced an expedited review process for distance education approval. On May 15, the USDE expanded the approval for the use of distance education through December 31, 2020. The expedited review process has now been removed, and institutions planning to offer 50% or more of an educational program via distance education in the future will use the regular substantive change process.

**Annual Institutional Update (AIU) Launch:** The 2020 Annual Institutional Update (AIU) launches on Monday, July 13 and remains open through Friday, August 14. Additional information specific to the AIU will be sent to key contacts in June.

I would now like to introduce Dr. Sean McKitrick, Vice President for Institutional Field Relations.
Dr. Sean McKitrick, Vice President

Thank you, Dr. Fogarty.

As Dr. Perfetti said, our institutions have risen to the many challenges resulting from COVID-19. On March 9, 2020, the Commission requested that institutions provide an update, due April 1, 2020, about any changes in approach regarding distance education, consortial arrangements, academic calendaring, and the ongoing impact of COVID-19 interruptions.

As soon as these were received and downloaded, they were reviewed by the vice presidents of institutional field relations and senior staff as the Commission sought ways to support institutions regarding policies and appropriate waivers and modifications to ensure a more seamless transition as institutions sought to serve their students. A study of these institutional updates was also conducted to discern any aggregate trends, to support member institutions, and to ensure that the Commission was in alignment with USDE guidance. By studying these institutional updates, the Commission also wanted to see what could be learned from these updates as it pertains to institutions’ adapting their practices, all the while remaining in compliance with Commission expectations.

The results of this study were overwhelmingly positive, demonstrating in numerous instances that institutions have risen to the many challenges presented to them by COVID-19. Some examples are as follows:

- At the beginning of the COVID-19 crisis, member institutions reported that they took immediate action to ensure that all students were safe. Examples of such actions include restricting staff travel, closing or restricting access to student housing, requiring study abroad students to return home from study abroad after taking appropriate precautions, and, in some cases, providing additional resources when needed. In facilitating students’ return, institutional staff provided access to housing, food, and other resources for those students who could not return home.
• These initial efforts to establish a baseline of safety and security were followed by the development of concerted efforts by institutions to develop and implement strategic game plans that focused on reaching out to students unfamiliar with participating in on-line delivery modalities. Some institutions developed crisis response teams to coordinate implementation of various response strategies and others achieved such coordination through senior staff meeting. Whatever the team strategy, in most cases there was evidence of thoughtful organizational response. For example, there was initial concern about international students and their participation in synchronous online experiences because some of these students returned to places well outside the time zones of their colleges and universities followed by subsequent action about the quality of both asynchronous and synchronous instruction, a conversation that no doubt continues.

• Initial efforts to develop and implement response strategies were immediately followed by efforts to ensure the delivery of course content was sufficiently rigorous. Strategies ensuring appropriate content delivery appeared to be mostly associated with ensuring that academic terms were of sufficient length. Most institutions extended or shortened their spring break but did not make significant changes to their academic calendars that would not give students enough time to develop skills with appropriate feedback from their instructors. The employment of these and other strategies evidenced significant and successful planning on the part of various institutional stakeholders to help ensure that the students enrolled in courses in the region were able to progress toward completion of their studies.

• Institutions continued their focus on ensuring that faculty, staff, administrators, and students were able to navigate challenges associated with participating in or offering services through an on-line modality. Training was carefully planned. In several cases, faculty and staff participated in training during term breaks but it is clear that faculty and staff training needs were promptly addressed by information technology, instructional, and centers for teaching and learning staff. But equally inspiring was evidence that faculty experienced in on-line teaching mentored those with less experience, either as a result of careful planning or even from faculty’s seeing a need for peer training and filling that need both at the beginning and during the crisis. In retrospect, information submitted by institutions evidenced that students, staff, faculty, and others came together to obtain the training they needed so that students could participate in learning environments as comparable to those offered before the COVID-19 crisis and, when there were concerns, these were addressed as soon as possible, as effectively as possible.

• Staff employed at other units also strategized carefully about how to ensure students had access to student support resources, such as training students on the use of technology and addressing equity issues relating to disparate access to technology. Institutions appear to have developed and implemented monitoring systems so students needing services could access them, such as access to the support in the form of ensuring continued food security, continued support by centers for teaching and learning, libraries, disability services, and health center staff, to name a few.

• These and other efforts enabled faculty, staff, and administrators to then focus on developing and employing quality educational experiences to ensure students could acquire knowledge and skills in their areas of choice, and graduate. In cases where students were required to engage in clinical, field, student teaching, and other required experiential learning modalities, there is evidence that institutions first relied on guidance provided by state agencies, programmatic accreditors, professional associations, and MSCHE on issues as diverse as grading on a pass/fail basis, working with clinical simulators, delaying student teaching and field experiences without interfering too significantly with students progress toward completion. In some cases, this was a challenge, but these efforts had the students in mind, with a simultaneous focus on quality and students’ meaningful and substantive interaction with their instructors.

Just as essential employees, such as healthcare workers, transportation professionals, grocery workers and others are national heroes during the COVID-19 crisis, so too are administration, staff, and faculty who have worked hard on clarifying issues having to do with course grading, reaching out to students in need, ensuring
equity in access to information technology resources to the best of their ability, and relentlessly focusing on quality.

No doubt, the challenges associated with COVID-19 were daunting. However, a concerted focus on students— their learning and progress toward completion— remained a central concern, and it appears from institutional reports that institutions and their students rose to the occasion, reflecting the phrase contained in the preamble of the Commission standards, “Where students are well served, society is well served.”

I will now turn to Dr. Christy Faison, our Senior Vice President for Accreditation Relations, who has more information for us.
Dr. Christy Faison, Senior Vice President for Accreditation Relations

Thank you, Dr. McKitrick. The Commission recognizes that these are stressful and challenging times, fraught with the unknown. We, at the Commission, are committed to assisting and supporting our institutions while balancing the flexibilities we can provide with our obligation to monitor and assess institutions as part of our responsibility to assure students and the public of educational quality. As Dr. Fogarty mentioned, we are currently exploring options for fall virtual visits and other initiatives to assist institutions with all accreditation activities. We will be providing additional guidance in the coming weeks.

It is important that you continue to monitor and address institution-specific matters with MSCHE and/or the USDE. While addressing COVID-19 interruptions, the Commission expects ongoing compliance with its standards for accreditation, requirements of affiliation, and policies and procedures within the guidelines of USDE guidance and MSCHE temporary policy modifications granted to institutions.

The Commission will continue to monitor, interpret and communicate guidance and provisions set forth by the USDE via constituent specific communication and the MSCHE Website. We suggest that you monitor the websites of both MSCHE and USDE for the most up-to-date information.

We also encourage institutions to continue to reach out to your specific state and/or system offices for additional guidance as conditions and circumstances change. If you are a state or system representative, we encourage you to keep MSCHE updated on relevant measures being taken. We would ask that you contact Ms. Diana Bonner at dbonner@msche.org with any updates.

We will get through this together and we will continue to work with institutions around MSCHE processes.
As you continue to have questions, we encourage you to reach out to us.

- The institution president or accreditation liaison officer (ALO) should work collaboratively with their MSCHE Vice President liaison. If you are unsure as to who your vice president is, please consult your Statement of Accreditation Status via the MSCHE website, or they are also listed within the institution portal.

- If peer evaluators have questions about current or future assignments, please contact Ms. Erin Mattson at emattson@msche.org.

- If you have questions about our substantive change policy and procedures, especially upcoming changes, please feel free to reach out to Ms. Carmella Smith at csmith@msche.org.

- We ask that all media and associated requests be sent to Mr. Brian Kirschner at bkirschner@msche.org.

We hope the information we have provided today offers some assistance to you and your institution. If there is something that has not been addressed by our comments or communications, or if you have a question and are uncertain about where to direct your inquiry, please contact communications@msche.org and we will direct the question to the appropriate person or unit within the Commission Staff.

We appreciate all you are doing to assist your students. Please be assured of the continuing interest of the Middle States Commission on Higher Education in the safety, health, and well-being of our member institutions and all who contribute to peer review.

Thank you.

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