

Special Visit Report, WSCUC

Northern Marianas College

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Table of Contents

Nature of the Institutional Context and Major Changes since Last WSCUC Visit3

Statement on Report Preparation.....4

Response to Issues Identified by the Commission and the Last Visiting team4

 Issue 1 – CFR 1.5 4

 Full Description of Issue 4

 Actions Taken by Institution 5

 Self-Reflective Analysis of Efficacy 6

 Next Steps 6

 Issue 2 – CFR 1.7 7

 Full Description of Issue 7

 Actions 7

 Self-Reflective Analysis of Efficacy 10

 Next Steps 10

 Issue 3 – CFR 3.9 11

 Full Description of Issue 11

 Actions 11

 Self-Reflective Analysis of Efficacy 12

 Next Steps 12

Identification of Other Changes or Issues the Institution is Facing12

Closing Statement.....13

Other Documents Made Available.....13

Nature of the Institutional Context and Major Changes since Last WSCUC Visit

Northern Marianas College is a Land Grant Institution that was founded in 1981. Its focus continues to be ensuring student success and meeting the higher education and vocational training needs of the Commonwealth of the Northern Mariana Islands (CNMI).

With a campus on Saipan and instructional sites on Rota and Tinian, the College has developed a comprehensive set of academic programs and services that address the social, cultural and economic development needs of its island communities. Today, students are enrolled in credit programs that lead to associate degrees in business, liberal arts, natural resource management, nursing, business administration (with emphases in accounting, business management, and computer applications), criminal justice, and hospitality management, and bachelor degrees in education (with concentrations in early childhood education, elementary education, rehabilitation and human services, and special education) and business management. The latter degree was launched in 2014.

In addition to its credit programs, the College also offers noncredit, continuing education courses that are offered in various formats (online, short-term, accelerated, etc.) throughout the year. Since the College's establishment, more than 20,000 people have enrolled in degree and certificate courses, over 3,000 students have been awarded certificates and/or degrees in programs offered or coordinated by NMC; more than 12,000 individuals have been served in the community through such programs as the Adult Basic Education, Continuing Education, and the Cooperative, Research, Extensions, and Education Service (CREES).

Since the last visit by the accrediting commission, NMC was notified that it has become fully accredited under WASC Senior College and University Commission. This transition has led to a variety of paradigm shifts as the College migrates from the former ACCJC Standards.

NMC has also had multiple changes in key personnel. The former president, Dr. Sharon Hart, requested leave from the college at the start of 2016. This leave extended to the completion of her contract. Currently Interim President David Attao is the CEO. In February, 2016, the BOR adopted Resolution 2016-02, which formally initiated the search for a new CEO. Additionally, the former Accreditation Liaison Officer, Amanda Allen-Dunn, resigned. Currently Dr. Brady Hammond is the ALO. Lastly, the Board of Regents welcomed two new regents: Regent Michael Evangelista and Regent Irene Torres.

The most significant event, though, occurred on August 2, 2015, when Typhoon Soudelor passed directly over the island of Saipan. The storm dealt a major blow to the physical resources of the College as the 200 mile per hour winds left 19 of the 25 buildings on the Saipan campus with major damage. While reconstruction has been ongoing, the facilities are reopening with full functionality. Despite the extreme hardships forced on all College stakeholders, NMC marshalled its resources and redoubled its commitment to quality education and extension. These efforts were rewarded in May, 2016, when the institution conferred over 200 degrees to its largest graduating class ever.

As the Fall 2016 semester begins, the College maintains its focus on quality and continues to seek to improve at every level through coordinated efforts from every stakeholder.

Statement on Report Preparation

Accreditation is vital to any institution of higher education, and Northern Marianas College (NMC) has made the reaffirmation of accreditation one of its Strategic Imperatives.

On May 24, 2016, WASC President Mary Ellen Petrisko contacted NMC Interim President David Attao to notify him that WASC would be conducting a Special Visit to the College due to concerns regarding the compliance of the institution to WASC Standards. The focus was on CFR 1.5, 1.7, and 3.9 specifically.

Due to the fact that the areas of concern dealt primarily with the Board of Regents (BOR), the institution prepared the report with the help of the key institutional stakeholders that will be involved in the Special Visit. This includes the Regents on the BOR, BOR Legal Counsel, BOR Secretary, the Interim President, and the Accreditation Liaison Officer (ALO). Additional information was provided by the External Relations Office (ERO) and the Human Resources Office (HRO).

The report itself underwent multiple drafts and collaborative feedback sessions with the BOR. The aim was to produce a concise document that accurately assesses the context of each issue identified by the Commission in its letter regarding the Special Visit. Additionally, the contributors to the report sought to ensure that the issues in question did not indicate other areas of concern. In short, the report is designed as a self-assessment examining the compliance of the institution to Commission Standards.

Response to Issues Identified by the Commission and the Last Visiting team

Issue 1 – CFR 1.5

Even when supported by or affiliated with governmental, corporate, or religious organizations, the institution has education as its primary purpose and operates as an academic institution with appropriate autonomy.

Issue in Brief

- Questions have arisen over the relations between NMC and external entities, particularly as they relate to the “appropriate autonomy” demonstrated by the institution.

Full Description of Issue

The autonomy of the institution has been called into question due to the relationship between the College and the CNMI government. The Northern Marianas Constitution Article XV, Section 2 (a) and 3 CMC Section 1311 both describe the Regent appointment process, which involves gubernatorial appointment. This appointment is confirmed by the Senate. There has not historically been a BOR committee that contributes to this process. The lack of BOR involvement has led to concerns that the process is largely controlled by the CNMI government, effectively jeopardizing the “appropriate autonomy” of the institution.

Actions Taken by Institution

- The BOR has reviewed its own policy regarding Conflicts of Interest.
- The BOR has created a Nomination Committee to ensure that the BOR has a voice in the regent selection process.

In seeking to be an institution with commendable integrity and transparency, NMC has made it a priority to evaluate its relationships with external agencies and related entities. Given the fact that the community of the CNMI is tightly knit, it is inevitable that certain connections will be found. However, it is incumbent on all College stakeholders, particularly the leadership, to demonstrate that any linkages between those outside bodies and NMC do not challenge its autonomy.

The first action taken by the institution was to review its policies relating to autonomy. BOR Policy 1017, the Conflict of Interest Policy, was adopted on August 8, 2013, and it applies to all BOR members. The policy was designed to jointly maintain compliance with accreditation Standards and with the CNMI Open Government Act of 1992. It requires that all Board Members must:

Disclose to fellow Regents any and all relationships that may be perceived by constituent groups as influencing judgment pertaining to any issue before the Board. Reportable relationships shall include but not limited to blood relationships, current or former professional associations, and personal friendships (BOR Policy 1017).

The Board determined that Policy 1017 was in compliance with WASC standards, but wished to further investigate the issue in terms of CFR 1.7 with particular regard to memorialization of the policy; this process is detailed in Issue 2 below. In terms of CFR 1.5, though, the Board further examined how the Regent selection process aligned with accreditation standards.

NMC conducted research on this subject to determine if the gubernatorial nomination process is practiced at other WASC accredited institutions. As noted above, Regents are selected by the Governor of the CNMI. These selections are then given to the Senate, which reviews the nominees in its Committee on Executive Appointments and Government Investigations. The Senate then votes to confirm the nominated Regent based on the report of that Standing Committee. Research determined that similar processes do indeed exist at other WASC accredited institutions.

For instance, the University of California has a Board of Regents which, among others, contains “18 appointive members appointed by the Governor and approved by the Senate” (University of California Board of Regents, Bylaw 5). The California State University has a Board of Trustees that also has gubernatorial appointments. Accordingly, NMC determined that the issue of autonomy was not entirely predicated upon who appoints regents, but rather the input the Board has into that process. To seek ways to be more proactive and autonomous, the Board looked to its regional peer, the University of Guam (UOG), as it has had issues relating to Regent selection and autonomy in the past.

As noted in Guam Public Law 26-24, Section 1, “*I Liheslaturan Guåhan* is acutely aware that the Western Association of Schools and Colleges (‘WASC’) accreditation team report has identified that the University

of Guam ('UOG') continues to experience inappropriate executive and previous legislative intrusion into its affairs" (Guam PL No. 26-24).

The Law continues, noting that, "One (1) way to protect UOG's accreditation is by strengthening the autonomy of the current Board of Regents' ('Board's') membership nomination process" (Guam PL No. 26-24).

Based on these findings, the NMC Board of Regents has embarked on a multi-step process to ensure the institution strengthens its own autonomy and accountability. The first step the College has taken is to create a Nomination Committee.

As mandated by the IGBP, the governing board of an institution "must demonstrate that it has functioning committees, including at a minimum audit, academic affairs, finance, and membership or nominating or the equivalent" (Independent Governing Board Policy, 2).

The NMC Board has recently approved a measure to amend BOR Policy 1005, Standing Committees of the Board. Currently, the Policy mandates the following committees: Fiscal & Finance, Personnel, and Program. The recently approved action has amended Policy 1005 to include additional standing committees for Financial Audit and Nomination. Again, not only should this now bring the Board fully into compliance with the WASC committee requirements for governing boards, but it will also strengthen the autonomy of the Board with regard to gubernatorial appointments. This is because the Nomination Committee will not only make recommendations to the Governor regarding potential appointments, but the committee will also take ownership over the staggered term dates by actively monitoring them.

The Board also wishes to pursue legislative changes that can additionally strengthen the autonomy of the college. For that reason, the Board will begin to explore the various avenues that might bring about legislative change to support the Nomination Committee.

Self-Reflective Analysis of Efficacy

Ensuring compliance with WASC Standards is not always something that can be immediately rectified. Demonstrably strengthening the autonomy of the institution is a complex process that involves multiple stages as briefly outlined above. As far as short-term outcomes are concerned, the creation of the Nomination Committee has been tremendously useful since it can now ensure seat expirations are being adhered to. Additionally, since two BOR seats expire in May 2017, this will give the Nomination Committee ample time to identify nominees, new or old, for the expiring seats.

In terms of mid- and long-term outcomes, the Nomination Committee will also serve the crucial function of updating the staggered term schedule to ensure that no other questions arise regarding seat expiration or lineage.

Next Steps

The BOR will explore the best way to ensure that its new Nomination Committee has the resources necessary to effectively communicate pertinent information to the Office of the Governor.

Additionally, the BOR and CEO will seek ways to effect legislation to support the newly formed Nomination Committee.

Issue 2 – CFR 1.7

The institution exhibits integrity and transparency in its operations, as demonstrated by the adoption and implementation of appropriate policies and procedures, sound business practices, timely and fair responses to complaints and grievances, and regular evaluation of its performance in these areas. The institution's finances are regularly audited by qualified independent auditors.

Issue in Brief

- Questions have arisen regarding the business practices of the Board and whether or not they are sound. The specific issue surrounds the archival records that pertain to seats on the Board, their limits, and the memorialization of minutes and other relevant records produced by the Board.
- The BOR has additionally sought to enhance its transparency with regard to its Conflict of Interest Policy.

Full Description of Issue

In 2015, the Board of Regents received a communication from the late Governor Eloy Inos. The Governor informed the Board that the Attorney General had determined that the seats of certain Regents had expired. Based on this information, the Board launched an independent investigation into the matter. It was determined that the communication was accurate and that term limits for two Regents had expired. Understanding that two seats were now vacant, the BOR sought to have them filled as soon as possible. This gave the inaccurate appearance of a seat expiration “reset,” which prompted questions regarding the nature of term expirations; questions regarding the difference between an expiring term and termination arose. These issues in turn raised questions regarding the compliance of the BOR to its own bylaws and policies and, by extension, to accreditation Standards.

Actions

- The NMC Board of Regents has embarked on a digitization initiative to ensure that all Board Minutes are readily available to the public.
- The NMC Board of Regents has constructed a complete and evidence-based lineage of Board seats, which extends into the future to ensure that there will not be confusion about term dates again.
- The NMC Board of Regents has strengthened its transparency by developing a memorialization procedure to support its Conflict of Interest Policy.

Upon notification from the late Governor Eloy Inos regarding expired terms, the BOR immediately set about independently researching the issue. This was noted in Board Minutes from meetings on April 24,

2015, and July 24, 2015. The research process involved identification of seat lineages for the purpose of identifying start and end dates for Regent seats. Additionally, the process involved a search for legal precedents to determine how a Governing Board in the CNMI should handle expirations of term limits.

For the former, the College embarked on a lineage reconstruction process. This involved stakeholders from across the institution as well as archivists from different external bodies. The result was a determination that the information presented by the Attorney General to the Governor was accurate, and that the seats for Regent Torres and Regent Orilla had expired in May, 2014. However, the bylaws and policies of the Board cover events such as dismissal and resignation, but they do not explicitly deal with expiration. Thus, the College, led by BOR Legal Counsel, sought out legal precedents regarding the expiration of Board seats in a staggered seat system in the CNMI.

Based on CNMI Superior Court Civil Case No. 15-0047, the CNMI government had already determined that the initial staggering of terms was the key factor in determining term limits, not date of appointment. Thus, a Regent was no longer serving in that capacity when the seat her or she occupied reached its predetermined end limit based on the initial staggered term limits established in 1986. This meant that the expiration of any seat, based on the original staggered term schedule, was concurrent with the end of authority as a Regent. After reviewing its Removal from Office Policy, Policy 1018, the BOR determined that it had no authority to act in this case since expiration is not the same as removal, and made a public statement to that effect. Thus, the BOR adhered to CNMI law, took no action, and waited for new Regents to be appointed.

Despite the evidence supporting the fact that the BOR did not reset terms nor did it terminate any regents, the very fact that the above research needed to be conducted suggests that NMC had not maintained rigorous enough records on this matter. This is further reinforced by the fact that former Regent Torres had been appointed twice as Regent with dates that did not mathematically align with the original term expiration dates established on May 30, 1986. The actions above underscored the need of the College to strengthen its compliance with CFR 1.7.

The Board currently has electronic minutes dating back to January, 1997. However, the Board also has meticulously recorded its minutes since before the term limits were formalized in 1986. These additional minutes are stored in the CNMI archive as paper-based records. While it has been assumed that this archive was sufficient to maintain transparency, the confusion over term limits has revealed that the Board must migrate to a fully digital archive. For that reason, a process has been launched to digitize the archival minutes of the Board. The goal is to create a true digital archive that is functionally accessible to the public.

To accomplish this, the Board is working with the CNMI Archives and the NMC Library to digitize all Board minutes. Once digitized, the minutes will be added to the already robust online archive of minutes. This will create a complete archive of Board operations for over 30 years that will be readily available to the public.

Additionally, the Board has recognized that an evidenced-based document that displays the seat lineages, and by extension term expirations of all regents, has not been made publicly available. With the help of

stakeholders from across the College as well as those working at external archives, this document has been compiled and is now available. Further, all future appointment letters will include specific seat dates and the name of the previous regent. This process will be monitored by the newly formed Nomination Committee to ensure that accurate records of seat lineages are publicly recorded and available. This dedication to integrity and transparency has led the BOR to further examine the business practices surrounding its Conflict of Interest Policy.

As noted above, the BOR determined that its Conflict of Interest policy was in compliance with WASC Standards. The BOR, however, wished to strengthen its memorialization of the processes that support its policy to ensure that all its practices are transparent. Once again, Policy 1017 states that all Regents must:

Disclose to fellow Regents any and all relationships that may be perceived by constituent groups as influencing judgment pertaining to any issue before the Board. Reportable relationships shall include but not limited to blood relationships, current or former professional associations, and personal friendships (Policy 1017).

A comparison of Policy 1017 with the Independent Governing Board Policy (IGBP) from WASC revealed strong similarities. For instance, it states that:

Board members who have interests that fall into these categories are considered ‘interested’ persons, meaning they have multiple interests that may come into conflict with the interests of the educational institution. Interested board members have a duty to disclose their other interests and to refrain from participating in discussions about or voting on any matters that relate to the conflict. Generally ‘interested’ members leave the meeting when such matters are being discussed (3).

Thus, an “interested” Board member is not disallowed from being a member of the Board, but it is incumbent on both individual members and the board as a whole to be mindful of the policy and the process of recusal when conflicts do arise. To that end, the IGBP notes:

Governing boards need to publish their conflict of interest policies, circulate the policies annually to the entire board and obtain up-to-date signed statements from each board member. By signing the policy, members agree to disclose potential and actual conflicts and to act in accordance with the policy re: discussing or voting on the subject of the conflict. All board members, especially the chair and other officers, should be mindful of everyone’s conflicts and invoke the policy as situations arise, noting in minutes any recusals and absences resulting from conflicts (4).

It was determined that although the BOR is in compliance with the second part of this policy, there is not currently a mechanism in place that “[circulates] the policies annually to the entire board and [obtains] up-to-date signed statements from each board member” (4). In order to determine how other Governing Boards accomplish this, research was additionally conducted on the best practices of such bodies. Thus, NMC examined the policy suggestions from the Association of Governing Boards of Universities and Colleges (AGB) and the National Council of Nonprofits (NCN), both of which recommended a similar annual affirmation of the policy.

For instance, the AGB published a 12-point list of Conflict of Interest Principles. Point 5 of the list states the following:

Board members should be required to disclose promptly all situations that involve actual or apparent conflicts of interest related to the institution as the situations become known to them. To facilitate board members' identification of such conflicts, institutions should take affirmative steps at least annually to inform their board members of major institutional relationships and transactions, so as to maximize awareness of possible conflicts (5).

Again, the annual affirmation and disclosure is included. However, the specific process of reporting a conflict is not always spelled out. One such procedure has been found via the NCN on Pro Bono Partnership (PBP), a national organization that focuses on *pro bono* legal services specifically targeting nonprofits. The sample documents provided by PBP are largely derived from policies and principles established by the Internal Revenue Service. Those documents align with the recommendations made by WASC and the AGB, and they demonstrate the need for regular and formal disclosure of any and all conflicts. After review of such documents, the BOR intends to have them incorporated into the annual Self-Evaluation process.

Self-Reflective Analysis of Efficacy

The research conducted by the board has already helped the BOR to strengthen its compliance to WASC Standards. This is evident in the reinforcement of the original terms dates and charting of seat lineages. These two elements will help the College tremendously as they have produced a clear schedule of seat terms well into the future. The research conducted on seat expirations has also clarified the nature of expiration, which is a major element that is not clearly identified in existing bylaws.

The largest area to improve on is not the memorialization process, but instead the archiving process. To that end, the digitization initiative, which is currently underway, should address the concerns over accessibility and transparency.

Lastly, the memorialization processes of the BOR extend beyond minutes. Accordingly, a review of the compliance of the Conflict of Interest Policy has revealed that the memorialization of the processes associated with those processes need to be strengthened.

Next Steps

The BOR will continue to memorialize its minutes and archive them in an accessible forum, currently the NMC website.

Additionally, it is recommended that the BOR consider formalizing the information it located regarding expiration of term limits for Regents.

While the seat lineage is exceptionally useful in and of itself, its true use will come in its use by the newly created nomination committee. The combination of the lineage and the committee will reinforce the autonomy of the College at the same time it strengthens the business practices of the BOR.

Lastly, the expansion of the Self-Evaluation policy will need to be assessed after it has been completed to ensure that the targeted outcome of transparency has been achieved.

In short, the BOR will enhance its memorialization processes to ensure that transparency and accountability are priorities.

Issue 3 – CFR 3.9

The institution has an independent governing board or similar authority that, consistent with its legal and fiduciary authority, exercises appropriate oversight over institutional integrity, policies, and ongoing operations, including hiring and evaluating the chief executive officer.

Issue in Brief

- In October and November of 2015, former president, Dr. Sharon Hart, contacted WASC regarding compliance with WASC standards.

Full Description of Issue

In October and November of 2015, Dr. Sharon Hart, then president of NMC, spoke with WASC regarding doubts she had regarding compliance with Accreditation standards. These issues seem to have raised questions about the processes the BOR utilizes to evaluate and dismiss CEOs.

Actions

- The College has conducted a self-review of the policies surrounding evaluation and dismissal of the CEO.

Upon learning of the possibility that the BOR was out of compliance with WASC Standards surrounding its interactions with the CEO, the BOR immediately investigated both its policies and actions.

According to the IGDP, “Governing boards also need clear procedures for the evaluation of the CEO” (7). BOR Policy 1012, Periodic Review and Evaluation, contains a very clear 4-step evaluation process. Further, records show that this process was indeed conducted for the previous three years with evaluations begin conducted on September 30, 2012, October 15, 2013, and the final report being conducted at the conclusion of Fiscal Year 2014. As part of the process, the BOR gave the CEO an opportunity to discuss the evaluations. A review of the process, though, does suggest that a consistent evaluation instrument needs to be identified.

Although former President Hart was not dismissed, but instead served out her term while on her requested leave, the Board still wanted to ensure its policies relating to the CEO were in compliance with accreditation Standards. Policy 1013 clearly details the process for recruiting and hiring a CEO, Policy 1006 describes the Duties of the President, and Policy 1025 describes the plan of succession for the CEO

position. The latter policy became the focal point of inquiry as it details termination. Specifically, it notes that details of termination of the CEO will be included in the contract of the CEO, but it does not contain specific details as to those steps. Accordingly, the BOR researched best practices and found that that the IGDP requires Boards to have

“...clear procedures related to the continued employment or termination of the CEO. These decisions should be handled by the board with recusals of interested parties and objective and stated criteria for removal. Decisions on removal should not be left entirely to a related entity although such entities may reserve power to endorse a recommendation for removal made by the governing board” (8).

It was thus determined that Policy 1025 was in compliance with accreditation standards.

Self-Reflective Analysis of Efficacy

The research conducted by the College shows that the institution is currently acting in compliance with accreditation Standards. Policy 1012 clearly explains the CEO evaluation process, and evidence shows that it is indeed being followed. The College could consider a more robust evaluation process which involves multiple evaluations as suggested in the IGBP (7). For now, though, the evaluation process meets the key accreditation criteria.

Again, the fact that the former CEO was neither removed nor dismissed means that the College could not have been out of compliance with WASC Standards regarding termination. However, the self-review shows that there is currently a compliant policy in place that details the procedure regarding removal or dismissal of the CEO.

Next Steps

The BOR will conduct further research into CEO contracts as the recruitment and hiring process for the next CEO continues. Additionally, as the contract for the next CEO is written, particular attention will be directed toward the termination clause as required by Policy 1025.

Identification of Other Changes or Issues the Institution is Facing

One of the major changes still facing the institution is the hiring of a new CEO. The BOR has taken multiple steps to complete this process, most notably the adoption of Resolution 2016-02 on February 3, 2016, which initiated the Presidential Search process. The hiring of a new CEO is a necessarily time and labor-intensive process as the new CEO will be integral to the continued quality of the College.

Another change is that two new Regents were added to the BOR. Coupled with the restructuring of BOR Standing Committees, the BOR can now explore more directed trainings including those targeting financial

areas such as accounting and auditing, as well as more general trainings such as policy development and amendment trainings.

Additionally, the College continues to rebuild after the devastation of Typhoon Soudelor. While some buildings remain inoperable due to the severe damage they sustained, such as the gymnasium, others are reopening for the first time since August, 2003.

Closing Statement

NMC is dedicated to its students and their education. To ensure that they receive the highest standard of quality education, all institutional stakeholders know that accreditation must be maintained. More importantly, the stakeholders know that accreditation is simply a measure of quality. To that end, when the College was notified that it might not be in full compliance with accreditation Standards, it quickly moved to research the issues and determine if action needed to be taken. As the above discussions demonstrate, the Institution believes that although there were minor lapses, the institution was almost entirely in compliance with the CFR identified in the action letter. More importantly, through the evidence-collection process, the Institution has been able to identify potential deficiencies and address them. This has involved policy-level changes that have carefully considered both accreditation standards as well as the mission and vision of the college.

With the Interim Report due to WASC in Spring 2017, the Special Visit preparation process has additionally helped to direct the energies of the school toward the processes needed to support that report. Specifically, in collecting evidence for the Special Report, the BOR has helped to set the model that the Institution will follow to complete the Interim Report as well as the 2018 Mid-Cycle Report.

Based on the evidence collected and the actions taken, NMC is confident that it is full compliance with the issues raised in the action letter.

Other Documents Made Available

BOR Minutes – Seat Expiration; CEO Evaluation

BOR Policy 1005 – Standing Committees

BOR Policy 1012 – Periodic Review and Evaluation

BOR Policy 1013 – President Recruitment & Hiring

BOR Policy 1017 – Conflicts of Interest

BOR Policy 1018 – Removal from Office

BOR Policy 1019 – Board of Regents Self-Evaluation

BOR Policy 1025 – Succession Policy

CEO Contract Template

CEO Request for Leave

CNMI Superior Court Civil Case No. 15-0047

Evidenced-based Seat Lineage