

Testimony for the Higher Education & Employment Advancement Committee
From
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On behalf of the University of Saint Joseph I am submitting testimony on H.B. No. 6715 (RAISED) AN ACT REQUIRING CONNECTICUT TO PARTICIPATE IN THE STATE AUTHORIZATION RECIPROCITY AGREEMENT REGARDING DISTANCE LEARNING PROGRAMS.

Since 2011 the University of Saint Joseph has taken numerous steps and invested significant resources to ensure that our offering on-line master's degrees in Biology, Biochemistry, Nutrition and Chemistry (added in 2014), and an on-line graduate certificate in Integrative Genomics is compliant with state distance learning regulations. Initially this required the dedication of staff time to reviewing fifty-two sets of regulations (including Puerto Rico and the District of Columbia). As we quickly discovered, for most states the critical concern was the extent to which our program established a "physical presence" in that state, and there was a broad range of diverse and distinct definitions of what constituted physical presence. In many states the structure of our programs did not in any way violate physical presence and we were allowed to offer the program without additional documentation. In some cases, only a minor adjustment was required. For example, at that time the state of New Jersey determined that our requiring students to arrange for a proctor for their comprehensive examination established a physical presence even though students paid for that proctoring directly. Our university therefore invested in a remote secure proctoring system that New Jersey determined would no longer define us as having established a physical presence in that state. In other states, such as Wisconsin, we have been required to submit thorough and detailed applications with sizeable fees, many of them renewable annually, in order to offer the program. In some cases, such as Minnesota, approval costs resulted in our university's decision not to offer the programs in that state, and we have had to turn away prospective students.

For a small university like the University of Saint Joseph a State Authorization Reciprocity Agreement is a very welcome development. The investment required to maintain knowledge of changing regulations in every state and to develop applications for those states which require it is onerous. In addition, as we develop new programs we have to apply to many states again to add the new program. Frankly, in every case we have wondered why another state would not simply accept the integrity of the process which we undertook for successful approval for these programs from the Connecticut Office of Higher Education. In an era in which institutions of higher education are rightfully being asked to focus on efficiencies which support maintaining affordability and reasonable tuition rates, the current inefficient, duplicative, and costly system of distance learning regulation inhibits the achievement of the broader goal of affordability.

We understand the concerns expressed by our colleagues who have the ultimate accountability for ensuring the quality of higher education and consumer protection in our state. However, it is our belief that these can be addressed through the increased level of communication and collaboration among institutions of higher education the reciprocity agreements will foster. The University of Saint Joseph therefore supports this bill that would authorize Connecticut to sign onto the State Authorization Reciprocity Agreement process because of the benefits which result for Connecticut institutions of higher education like ours and for the expanded number of out-of-state students we could serve with this more efficient system.