February 14, 2019

Good morning Senator Haskell and Representative Haddad and members of the Higher Education and Employment Advancement Committee. I would like to express my support for SB 26, AN ACT MAKING PERMANENT THE MORATORIUM ON APPROVAL OF A CERTAIN NUMBER OF PROGRAMS AT INDEPENDENT INSTITUTIONS OF HIGHER EDUCATION.

As a result of Public Act 13-118, public colleges became exempt from OHE oversight for modification and thus need only to seek approval from their own boards. No other level of review is required. That Act did attempt to streamline the process for the independent colleges; however, the new process was still quite burdensome and time consuming for these institutions (all new programs, program modifications, program accreditations, new institutions, and institutional accreditations had to be approved by the Office of Higher Education). Connecticut College, Trinity College, Wesleyan University, and Yale University are already exempt from this process.

PA 16-36, AN ACT CONCERNING PROGRAM APPROVAL FOR INDEPENDENT INSTITUTIONS OF HIGHER EDUCATION alleviated this significant impediment for
qualified¹ private non-profit institutions of higher education program modification. These modifications are often designed to better meet the needs of students and employers. This streamlined process appeared to be working quite well but its sunset date was July 1, 2018. PA 18-33 changed the sunset date to July 1, 2020, for these qualifying institutions and added a few additional requirements²

I believe that the sunset date should now be removed from the Connecticut statutes to allow parity with the program modification process for the public institutions (and the four already exempt privates). SB 26 is an expression of our continued focus on curtailing unjustified bureaucratic and duplicative regulation, and supports our commitment to responsiveness and efficiency.

I would not support legislation such as SB 7088, AN ACT CONCERNING PROGRAM APPROVAL AT INDEPENDENT INSTITUTIONS OF HIGHER EDUCATION, which would take a step backward by adding unnecessary requirements for the department to promulgate regulations. SB 7088 would adversely affect these independent institutions of higher education which already are required to meet regional accreditation standards. Many of these Connecticut institutions are among the top ranked schools in the nation and/or in the region. I would urge

¹In order to qualify, the institution must meet the following standards: (1) the institution maintains eligibility to participate in financial aid programs governed by Title IV, Part B of the Higher Education Act of 1965, as amended from time to time, (2) the United States Department of Education has not determined that the institution has a financial responsibility score that is less than 1.5 for the most recent fiscal year for which the data necessary for determining the score is available, and (3) the institution has been located in the state and accredited as a degree-granting institution in good standing for ten years or more by a regional accrediting association recognized by the Secretary of the United States Department of Education and maintains such accreditation status

²The act also limited the new program exemption to 12 programs per academic year and requires the institution to apply for approval for any additional programs. Under the act, exempt institutions must file with OHE a program action form created by the office prior to students enrolling in (1) any new program or (2) any program being modified.
you to pass legislation such as SB 26 which would permanently enable our state’s longstanding independent colleges to better meet the needs of students and employers in our state.

Thank you for hearing this important legislation.