I write today to respectfully submit testimony supporting Proposed Bills 131 and 26, and opposing Raised Bill 7088. Exemption from program approval is necessary to grow the economy we strive for in Connecticut, and there are ample other resources to meet the goals of assuring quality.

Connecticut is fortunate to be home to a broad range of institutions of higher education. Public institutions span a state university, regional universities and community colleges. Private institutions of higher education range from 1) highly selective private universities and liberal arts colleges (Yale, Connecticut, Trinity and Wesleyan) to 2) large private universities (such as Fairfield, Quinnipiac, Sacred Heart and the University of Hartford) to 3) smaller private liberal arts colleges (such as Albertus Magnus and Goodwin).

Mitchell College, where I am President, is yet a different kind of institution of higher education, and one of only four or five in the United States that serves students with learning disabilities (25%) or who otherwise need a highly supportive college environment to reach their potential. Right now, 35% of college-age students (and over 70% of college-age students with learning disabilities) do not seek higher education and are increasingly left behind; we seek to change that with a unique, ability-driven academic program coupled with a cross-campus, interwoven support model.

The vast range of institutions of higher education in Connecticut is of course a strong advantage in attracting and keeping students, employees and employers in the state. Yet that variety means that the complexity of programmatic offerings is also vast, and changing quickly to respond to a rapidly changing world. Gone are the days when program review entailed ensuring logical sequencing of content and stated learning outcomes. Our curriculum requires an understanding of how to teach to a range of learning styles in the classroom, how to teach abilities (not content) and how to teach in concert with inter-related support systems across campus. I venture to say that this is vastly different from having enough content knowledge to evaluate courses on oenophilia, mindfulness, psychosynthesis, pandemic risk and medieval Spanish history, and that that range of content is also challenging.

It is most likely a result of that complexity that all but a handful of states have eliminated program review and rely instead on regional accrediting bodies. Our accrediting body, the New England Commission of Higher Education (“NECHE”), undertakes rigorous reviews by engaging peer reviewers, from like institutions. This is very effective, as the review teams come from institutions which are more similar programmatically (for instance, highly selective liberal arts for a school in that sector of the market or a small liberal arts college for one like ours). These reviews start with an extensive self-study (which frequently takes a year) and involve an analysis by a peer review team which culminates in a multi-day visit where the team asks good questions of all the institution’s constituents across all aspects
of operations and is consequently effective at assuring quality. Market forces also work to make sure that programs are what students and employers need and are non-duplicative to the extent necessary in a particular market.

The disparity of regulated institutions in Connecticut is also striking. Public and grandfathered institutions are not regulated, so how can a system that only regulates some assure quality? Or be fair? The process, as many have pointed out, is burdensome and costly, especially for smaller colleges like ours, and to what point?

States, like higher education, now live in an environment of limited resources, where they must nonetheless be competitive with other jurisdictions. Difficult decisions, to be sure, are the result, but re-allocating resources to what helps our state and its students and employers most, as almost every other state has done, is the logical and best choice.

We therefore very much support Proposed Bills 131 and 26.

The provision in Raised Bill 7088 that purports to draw distinctions among institutions based on graduation rates, loan default rates and graduate employment rates is particularly concerning. Vastly different outcomes exist at different institutions based on the students they serve. Schools that serve high academic achievers of course will have very different results than schools which serve students who have not reached their potential when they enter college. We measure success on how much our students grow during their experience, not purely how many meet a particular goal in a fixed amount of time. As to employment outcomes, as Drew Faust, then President of Harvard, once wrote:

> The focus in federal policy making and rhetoric on earnings data as the indicator of the value of higher education will further the growing perception that a college degree should be simply a ticket to a first job, rather than a passport to a lifetime of citizenship, opportunity, growth and change.

> I graduated from Bryn Mawr College in 1968, and my first job was working for the Department of Housing and Urban Development. My starting salary was low, but I was inspired by the civil rights movement and the War on Poverty to regard public service as an important calling. I went on to graduate school, joined the faculty at the University of Pennsylvania and ultimately became the president of Harvard University. Should Bryn Mawr have been judged based on what I was paid in my first year at HUD?...

> When we decide what to measure, we signal what counts. Equating the value of education with the size of a first paycheck badly distorts broader principles and commitments essential to our society and our future.

Excerpts from a letter to the editor of the New York Times

By: Drew Gilpin Faust
Then President of Harvard University
Published February 21, 2013

As a person who has had the privilege to guide a private college in Connecticut for the past four and a half years, and to be a Trustee of both a private university and a private highly selective liberal arts college for over a decade, I urge you to think about the diversity of colleges and universities we have in Connecticut as a huge strength, to nurture that through programs that market that diversity to employers and students, and to leave, appropriately, to accrediting bodies the role of overseers of quality.