



UNIVERSITY OF SAINT JOSEPH

CONNECTICUT

**Testimony for the Higher Education & Workforce Advancement
Committee**

**From Michelle M. Kalis, Ph.D. Provost, University Saint Joseph
February 14, 2019**

Thank you for the opportunity to speak to you on the approval process for new programs in the state of Connecticut. I am here today to testify in favor of SB 26 and SB 131, AN ACT MAKING PERMANENT THE MORATORIUM ON APPROVAL OF A CERTAIN NUMBER OF PROGRAMS AT INDEPENDENT INSTITUTIONS OF HIGHER EDUCATION and in opposition to HB 7088, AN ACT MAKING PERMANENT THE MORATORIUM ON THE APPROVAL OF THE OFFICE OF HIGHER EDUCATION FOR A CERTAIN NUMBER OF PROGRAMS AT INDEPENDENT INSTITUTIONS OF HIGHER EDUCATION.

SB 26 and SB 131 seek to make the existing exemption from academic program approval by the Office of Higher Education for private, non-profit colleges that meet certain standards permanent by deleting the current sunset date of July 1, 2020.

The University of Saint Joseph has a lengthy review process that makes the OHE program approval process duplicative and unnecessary. For a new program to be approved at USJ, the process usually takes a least one year. A program proposal is developed, this includes market data, feasibility study, including job prospects for graduates, required resources, a full financial pro-forma, anticipated enrollment, curriculum, faculty required, and timeline for implementation. The program proposal is developed by faculty within a department, the dean reviews and approves the new program. The proposal is submitted to a curriculum committee, which consists of faculty and administrators from across the University. All new course syllabi must be included in the submission. Following approval by the Curriculum Committee, the proposal goes before the Faculty Committee of the Whole, the faculty governance unit. After approval by the full faculty the proposal goes to the Provost for review and approval, followed by the President. Revisions are generally made throughout the process. The final two steps include review and approval by the Academic Affairs Committee of the Board of Trustees followed by approval by the full Board of Trustees. The regional accrediting body, the New England Commission of Higher Education (NECHE), is informed of new programs and these programs are part of the five and ten year reviews. If the program is considered a substantiative change, NECHE, will do a full review, including a site visit. Examples of a substantiative change would be a

degree at a higher or lower level than other programs at the University. In addition, many of the programs at USJ require specialized accreditation/approval, some at the state level, such as nursing and education, and many at the national level, such as nursing, education, pharmacy, social work, and physician assistant, etc. The specialized accrediting body re-accredits via a rigorous process every 5-10 years (varies by accrediting organization).

The current exemption from OHE approval requires that an institution be regionally accredited (NECHE in the case of colleges and Universities in CT) and in good standing. NECHE has strong oversight and requires annual reporting on the institution's programs and financial health. NECHE, as one of six regional accreditors approved by the Council on Higher Education Accreditation, is the appropriate entity to monitor the quality of programs at our institutions.

In my experience in Connecticut several years ago when OHE approval was required for new programs and program modifications for private, non-profit institutions the process added unnecessary administrative work, cost and delays in program implementation. The OHE process required different documentation than the regional or specialized accreditors. Therefore, additional time and money is spent on creating these documents and then the approval process itself added several months, at a minimum, to the process. This can cause a delay in responding to the needs of the market as well as students. Further, the value the OHE review process added to the development of new programs or program modifications was limited and no USJ program was ever denied by OHE.

As an institution we actively work with local employers to meet their workforce needs. For example, when we learned of the work done by the state to attract employers such as Infosys, we met with leaders at Infosys (and other companies) to ask how we could collaborate and create a pipeline for their workforce needs. We are currently discussing the development of a completion program for Community College graduates who would work for Infosys and earn their bachelor's degree from USJ in computer and data science, possibly using our Hartford location. We recently met with Connecticut Center for Advanced Technology to talk about how we can help to provide a workforce to meet the technology and manufacturing workforce needs in the state. Another example, was the addition of a psychiatric mental health nurse practitioner certificate program. This allows nurse practitioners in other disciplines to add the psych NP credential by taking a few courses, they become eligible for the licensing exam and if licensed they can practice as a psych NP. There is currently a shortage of behavioral health practitioners in the state, USJ is responding to this need.

The exemption from program approval has allowed USJ to work collaboratively and innovatively with external partners to develop new programs without undue delay from a lengthy, duplicative review by OHE.

USJ opposes HB7088 which seeks to require OHE to promulgate regulations to govern which institutions are exempt from program approval. In addition to the current

requirements already outlined in state statute which govern which institutions are exempt from program approval and which is not, HB 7088 requires OHE to adopt thresholds for eligibility for program approval around graduation rates, employment outcomes, and student loan default rates. These outcomes have no correlation with the academic program approval process. And while they have some relevance to traditional undergraduate programs, they have no relevance to degree completion, second degree and graduate programs.

The program approval exemption for private, non-profit colleges that has been in place since 2016 has allowed USJ to be more nimble and responsive to student and market demand. The rigorous internal process coupled with NECHE and in some cases specialized accreditation provides the needed quality assurance. The exemption should be made permanent in its existing form as SB 26 and SB 131 have proposed. Thank you for the opportunity to speak on this important issue.