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**Testimony for the
Higher Education & Employment Advancement Committee
Jennifer Widness, President
Connecticut Conference of Independent Colleges
Thursday, February 14, 2019**

On behalf of the Connecticut Conference of Independent Colleges (CCIC), I am submitting testimony on three bills before you today on the issue of academic program approval:

- SB 26: AN ACT MAKING PERMANENT THE MORATORIUM ON APPROVAL OF A CERTAIN NUMBER OF PROGRAMS AT INDEPENDENT INSTITUTIONS OF HIGHER EDUCATION;
- SB 131: 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; and
- HB 7088: AN ACT CONCERNING PROGRAM APPROVAL AT INDEPENDENT INSTITUTIONS OF HIGHER EDUCATION.

CCIC supports SB 26 and SB 131, which seek to remove the sunset date of 2020 for the program approval exemption making it permanent in its current form. We oppose HB 7088, which seeks to require regulations be promulgated by the Office of Higher Education to determine eligibility and requires additional barriers be put in place for institutions to qualify for the exemption.

Connecticut simply cannot afford to continue to limit the capacity of our institutions of higher education to develop programs that are responsive to the needs of employers in any way. Daily you read about employers that cannot find the talent needed to fill vacant positions. The state's economy and the skills that are required to fill the jobs of the future are evolving so quickly institutions can barely keep up.

The program approval process adds weeks and sometimes months to the ability of an institution to get a new program online after it has gone through a comprehensive internal review process. An academic year can be lost entirely if a program is not approved in time to market it for the fall enrollment cycle. The exemption allows CCIC's member institutions to work closely with employers and develop innovative new programs to respond to market and student demand.

The program approval process does not ensure quality or provide consumer protection for students in this state and adding existing barriers as HB 7088 proposes will have no impact on improving outcomes. Prior to the exemption coming into effect in 2016, every program submitted to the Office of Higher Education was approved in 2015. Student outcomes have no correlation with this process, as can be seen in Figures 1 to 5.

The exemption in its current form requires an institution to maintain regional accreditation in good standing. NICHE, the regional accreditor for the New England region, has the capacity, expertise and resources to monitor and ensure institutional quality.

The program approval exemption should be made permanent as it is presently written and we urge Committee members to support SB 26 and SB 131.

PROGRAM APPROVAL: BACKGROUND

Historically, Connecticut law has required that private institutions of higher education seek approval of all new academic programs, and program modifications, by the Office of Higher Education (OHE). However, private, non-profit institutions have been temporarily exempt from program approval since 2016 if they meet specific standards in statute. Eligible institutions must:

- Be a non-profit institution (for-profit institutions are excluded from the exemption);
- Have received regional accreditation and operated in CT in good standing for at least 10 years;
- Be eligible to participate in federal student aid programs administered by the U.S. Department of Education, which monitors student loan default rates, among other things; and
- Be in good financial health, maintaining a financial responsibility composite score greater than 1.5 as determined by the U.S. Department of Education.

This temporary exemption was originally established via Public Act 16-36. It was extended for two more years unanimously via Public Act 18-33, which placed a cap of 12 on the number of programs exempt institutions can introduce without going through the program approval process. The 2018 law also required that institutions file a Program Actions Form with OHE for every new program that it introduces, prior to students being enrolled. Institutions must also notify OHE when programs are discontinued. The exemption from program approval expires on July 1, 2020.

LEVELING THE PLAYING FIELD

Four of Connecticut's independent colleges have always been exempt from oversight by OHE because of the date of their charter (Yale, Wesleyan, Connecticut College and Trinity).

The following twelve institutions qualify for the exemption as currently written: Albertus Magnus College, Goodwin College, Fairfield University, Hartford Seminary, Holy Apostles College & Seminary, Mitchell College, Quinnipiac University, Sacred Heart University, University of Bridgeport, University of Hartford, University of New Haven, and the University of Saint Joseph.

In 2013, a bill passed to exempt the state's public colleges from going through the program approval process administered by OHE. Approval of new programs is required only of their own boards -- UConn and the Board of Regents, as applicable-- before starting new programs. **Therefore, public institutions in this state have less external oversight of their programs than the independents.**

Thirty-five states do not require private, non-profit colleges to seek approval of every new program offered. Eight states exempt certain institutions that meet specific standards, such as obtain regional accreditation, as Connecticut does now. Six states require some form of program approval process but in these states, the public colleges go through the same or similar process. **Connecticut is the only state in the nation that requires outside approval of new programs for private colleges, but not their public counterparts.**

The program exemption therefore levels the playing field for Connecticut's independent colleges.

State oversight over academic program approval has no correlation with high graduation rates at private, non-profit colleges and universities.

Six-Year Total Completion Rate for Students Who Started at Four-Year Private Nonprofit Institutions, by Origin State

Source: National Student Clearing House

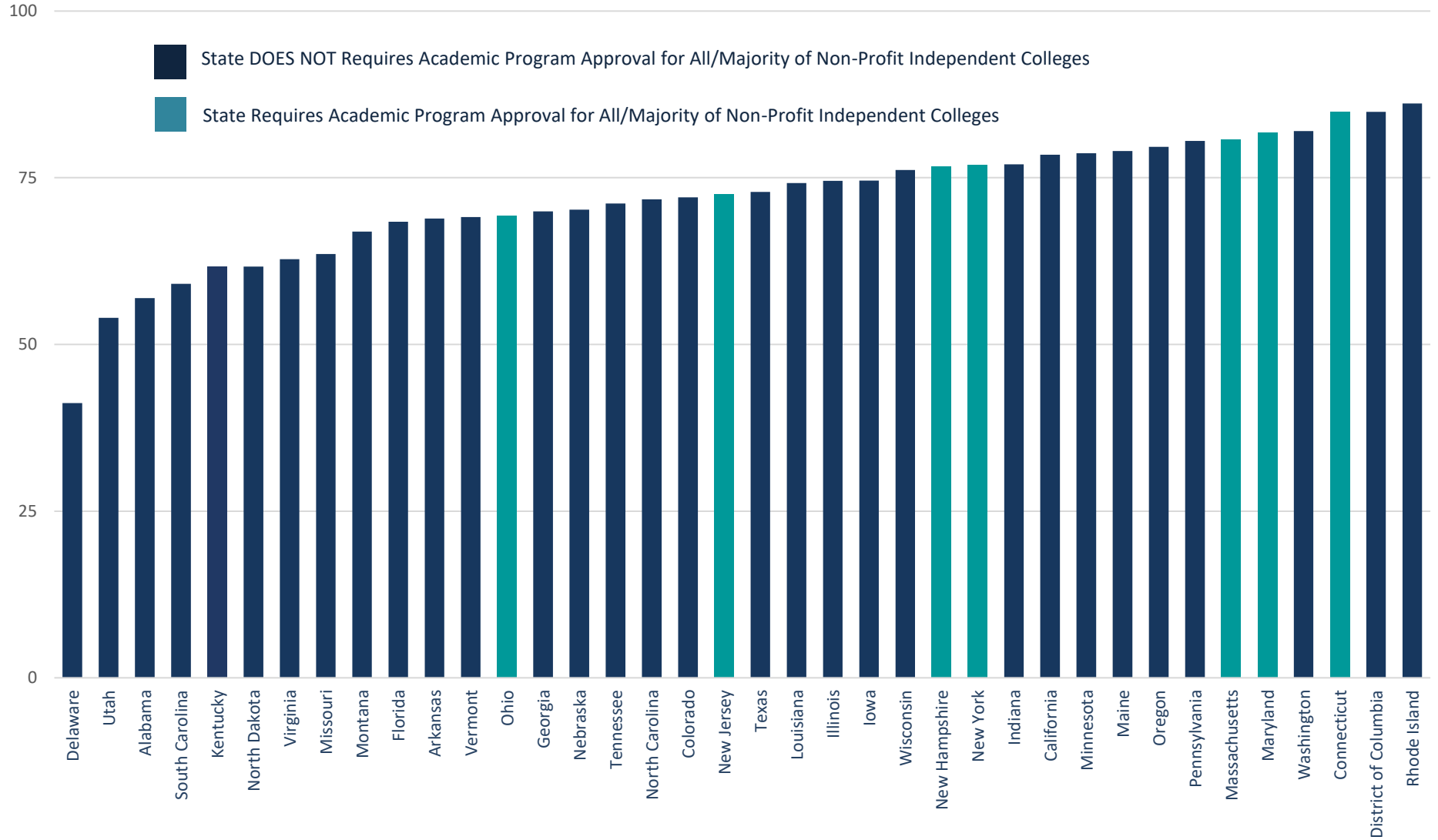


Figure 2

2015-16 Completion rates for first-time, full-time students at CT 4-year institutions

Source: IPEDS

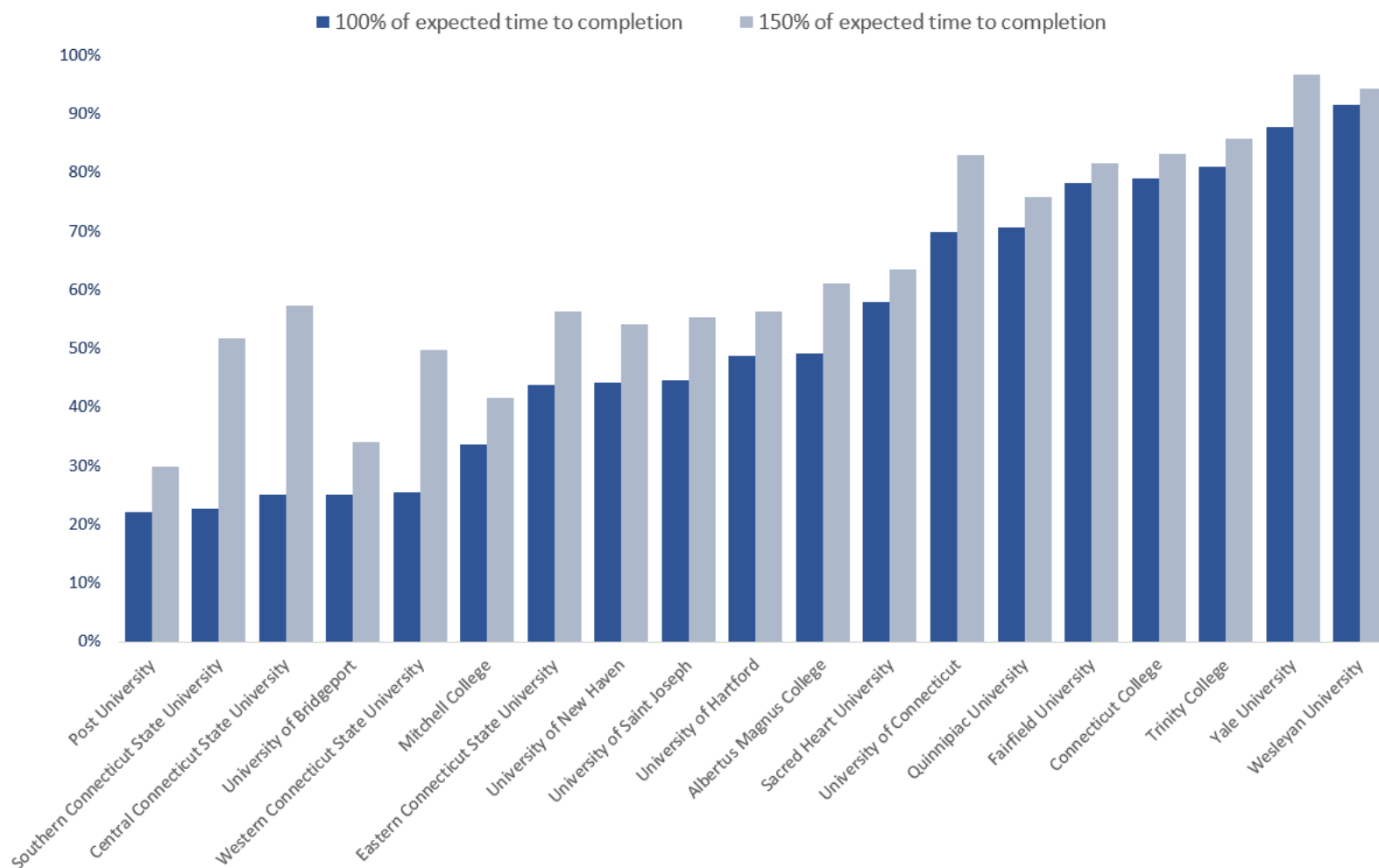


Figure 3

2015-16 Completion rates for first-time, full-time students at CT 2-year institutions

Source: IPEDS

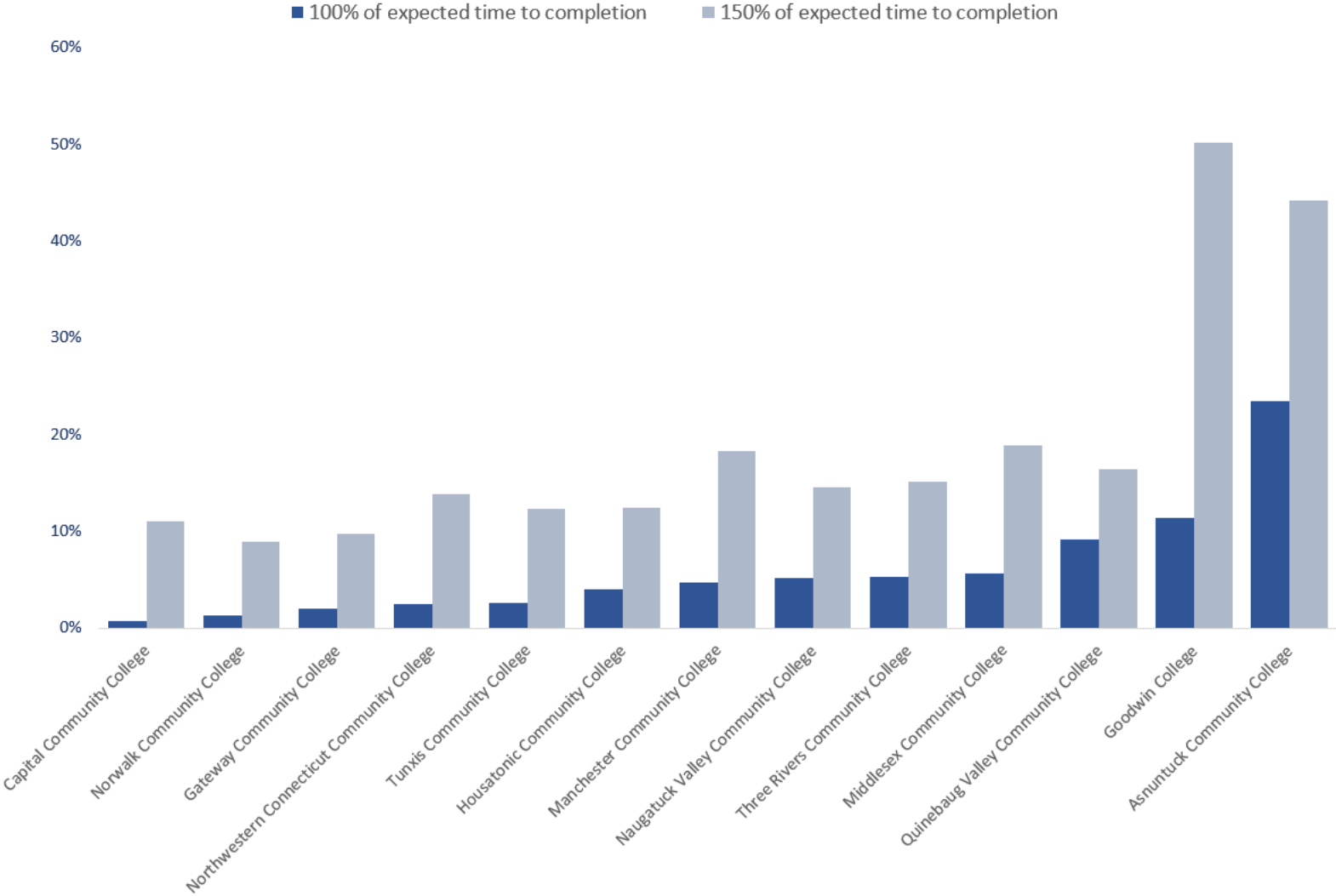
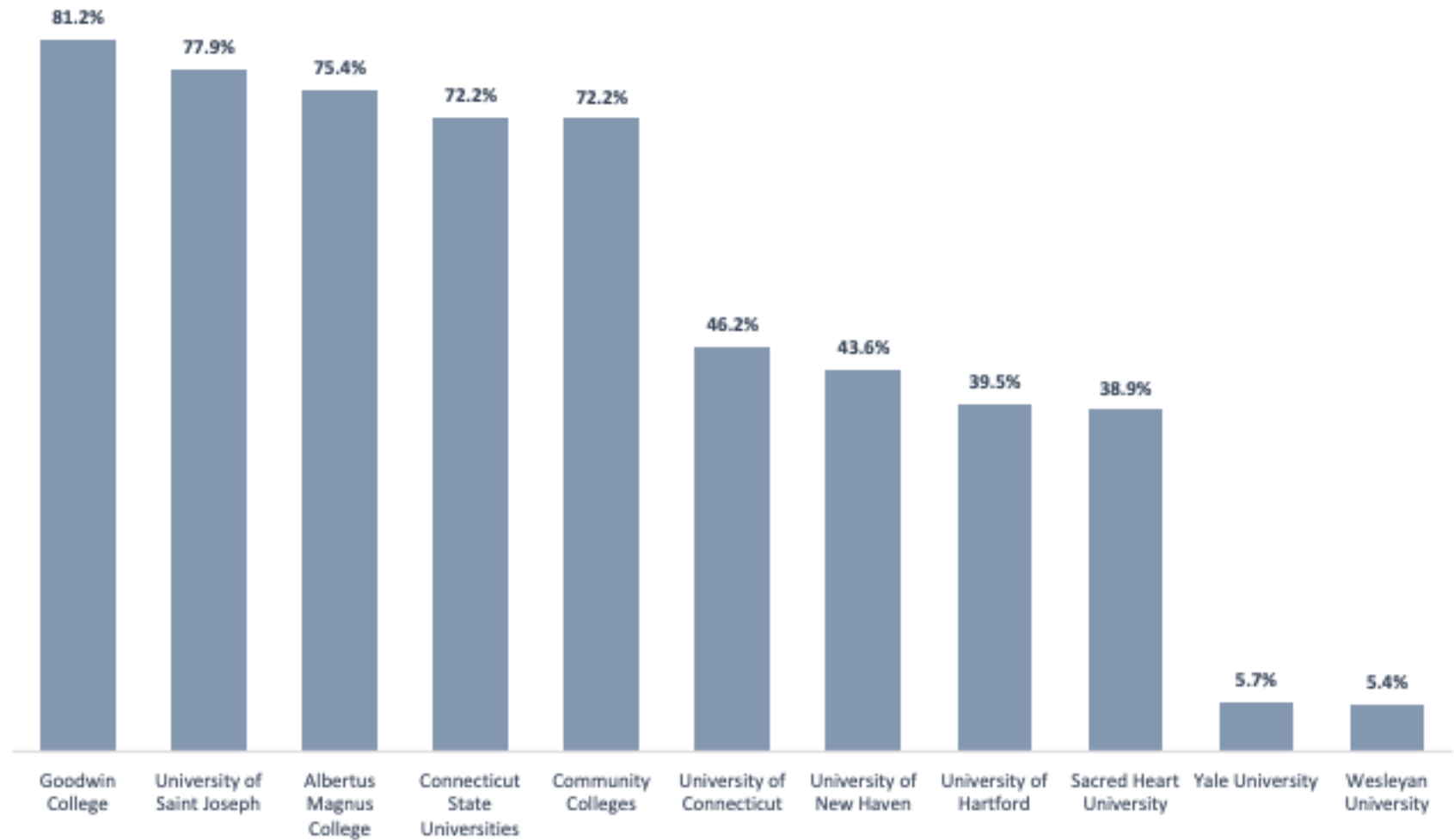


Figure 4

Percent of 2015 Graduates Employed in Connecticut Post Q8



Connecticut Higher Education Loan Default Rates - 2015 Cohort

