Testimony for the
Higher Education and Employment Advancement Committee
Jennifer Widness, President
Connecticut Conference of Independent Colleges
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On behalf of the Connecticut Conference of Independent Colleges (CCIC), I am submitting testimony on three bills before your today:

- **S.B. 881: AN ACT CONCERNING WORKFORCE DEVELOPMENT**;
- **H.B. 6374: AN ACT CONCERNING SEXUAL MISCONDUCT ON COLLEGE CAMPUSES**; and
- **H.B. 6461 AN ACT IMPLEMENTING THE RECOMMENDATIONS OF THE TASK FORCE REGARDING THE PREVENTION AND TREATMENT OF MENTAL ILLNESS AT INSTITUTIONS OF HIGHER EDUCATION**.

By way of background, Connecticut’s 15 private, non-profit colleges that comprise the membership of CCIC enroll over 80,000 students in Connecticut annually. They award nearly 50% of the bachelor’s degree earned in the state each year and over 60% of the graduate degrees earned. Of the bachelor’s degrees and above awarded in key areas that are targets for economic growth – engineering, computer science, bioscience and the health professions – most are earned at the state’s independent colleges.

**S.B. 881: AN ACT CONCERNING WORKFORCE DEVELOPMENT**

CCIC is grateful to Governor Lamont for his leadership in establishing the Governor’s Workforce Council and for putting resources and a strong team in place to support the implementation of the Council’s Strategic Plan. This work is critically important in ensuring Connecticut produces the talent pipeline that aligns with the needs of the state’s employers and to provide opportunity for our state’s citizens.

Independent colleges are well-positioned to support this effort as we offer in-demand degrees and have the capacity to be nimble and responsive to the needs of employers. Given our capacity to be help, **we would ask legislators to ensure that any language creating programs or opportunities for funding – such as the CareerConneCT program-- are flexible enough for private, non-profit colleges to participate.**

In addition, we have the following feedback on SB 881:

- **Academic Program Approval**: The Governor’s Workforce Council strategic plans calls on higher education institutions and workforce development programs to work more closely and
in alignment with business and industry in our state. One of the barriers that continues to be in place for private, non-profit colleges is the requirement that these institutions must submit new programs for approval to the Office of Higher Education when they reach the limit of the current statutory exemption provided in 10a-34, of 12 programs annually. While 12 new programs annually may seem like a big enough cushion, institutions may quickly exceed that cap if we chose to offer a series of new degrees in one concentration. Connecticut remains one of the few states in the country to continue to require private, non-profit colleges to go through this level of review. Connecticut public colleges are not required to have OHE review their new programs and, under the bill, they will no longer have to report to OHE anything at all about their program offerings. For additional background on the issue of program approval, see here.

We would ask that Section 5 of the bill be amended to remove the 12-program cap on our program approval exemption to better position private, non-profit colleges to respond to the needs of the state’s employers in developing new programs in alignment with the Workforce Council’s Strategic Plan. See draft language below.

- **FAFSA Completion (Sec. 13):** We strongly support the provision in this bill which seeks to require high school students complete the Free Application for Federal Student Aid (FAFSA) prior to graduation, beginning with the class of 2024, with a few important exceptions that are outlined in the bill. Higher education institutions stand willing to support districts with implementation through offering training sessions for students and their families, as they did this year.

  Annually, the independent colleges in Connecticut enroll over 13,000 Pell Grant recipients and grant over $1 billion in institutional aid. Accordingly, the average net price varies broadly based on a student’s estimated family contribution, which is determined in large part by completing the FAFSA.

  Connecticut’s achievement gap does not end at high school. Our state’s attainment gap – the difference in the percentage of white and minority adults that have a post-secondary degree – is among the largest in the country. One important component of closing this gap is to do more to educate high school students about what their eligibility for financial aid might be and to help them understand that higher education – at a public or private college – is more accessible than they might think.

- **UPASS (Sec. 22):** We strongly support the expansion of the UPASS program to students attending independent institutions. We have been interested in rolling this out to our students since it was first introduced for the public colleges in 2017. Expanding UPASS will provide greater access for our students to attend class, work and participate in internships in the state.

- **Credential Registry (Sec. 3):** The bill seeks to build off an initiative of the New England Board of Higher Education called the High Value Credential Registry and expand participation in this effort by requiring that every higher education institution in the state upload into this central repository at least 12 data points on every single program that they offer. We understand and recognize the value of having a centralized database of the post-
secondary programs offered in the state. In fact, we have already conducted a webinar for our member institutions to encourage their participation in this effort.

However, not every program is perfectly suited for the intent of this program and the data points the legislation is requiring we provide. For example, there is no specific Industry Classification code or occupation tied to a Bachelor’s degree in English.

We would ask that the bill afford some flexibility for participation by independent institutions and that independent institutions have an appointment on the Advisory Council working with the Office of Higher Education to create this new database.

• **Automatic Admission Program:** Certain CCIC institutions are eager to participate in the Automatic Admission program created under this bill, which seeks to ease the burden of applying to participating higher education institutions in the state for certain qualified Connecticut high school seniors. We very much appreciate the fact that the bill allows for independent institutions to participate in the Auto Admit program but would ask that the bill language be amended so that interested independent institutions be permitted to participate when the program launches – rather than being prohibited from participating until the summer of 2023 --- and that the $50,000 per institution fee associated with participation be eliminated or reduced.

**H.B. 6374: AN ACT CONCERNING SEXUAL MISCONDUCT ON COLLEGE CAMPUSES**

CCIC certainly appreciates and supports the intent behind HB 6374. Campus safety is a top priority for all of our member institutions.

We are comfortable with the amnesty provision in Section 1 of the bill and appreciate the changes that have been made to this language to narrow the scope of the provision since last session.

On the issue of the campus climate survey, many if not all, of our member institutions have conducted a climate survey in the past few years or have one planned in the new future. Our members frequently seek feedback from our students in many different forms on a very regular basis.

We are concerned that the bill as currently drafted not only requires that a campus climate survey be collected every two years – when some of our member institutions are on a cycle of every 2, 3 or 4 years – but also that it empowers a legislatively appointed Committee to select the survey tool that must be implemented on every campus around the state.

Many of our member institution’s campus climate surveys encompass much more than issues around sexual misconduct. Equity and diversity are critically important as well. Questions regarding experiences based on other protected classes (such as race, disability, national origin) may be included. In addition, every campus is different (residential; non-residential; comprehensive; undergrad only; etc.) and our surveys need the ability to reflect that.
We would ask the Committee modify the bill such that rather than having the legislatively appointed Council created under the bill select the survey instrument that must be utilized, a limited number of data points are identified in the bill that institutions statewide collect every two years, within their own climate survey tools, and report this information back to the legislature via our annual report to the Committee required under 10a-55m. This is similar to the approach Massachusetts allows for in its recently enacted legislation related to campus climate surveys and an approach we would support as well.

H.B. 6461: AN ACT IMPLEMENTING THE RECOMMENDATIONS OF THE TASK FORCE REGARDING THE PREVENTION AND TREATMENT OF MENTAL ILLNESS AT INSTITUTIONS OF HIGHER EDUCATION

During the pandemic, student mental health is a top concern at institutions of higher education in Connecticut and across the nation. According to a recent survey of college Presidents nationwide, conducted by the American Council on Education, sixty-eight percent of presidents ranked student mental health as a “pressing” issue that surpassed all other concerns. CCIC institutions across the state have worked diligently to increase services to address the need.

At the same time, institutions are also facing significant financial stress. Between reductions in revenue and increased costs to operate in the pandemic, CCIC member institutions have collectively lost over $225 million since March; and have only received about $60 million in federal relief to begin to cover those institutional losses.

With this context, we want to commend the Committee for raising this bill to highlight the importance of this issue but urge caution in placing an undue burden on campuses that are already doing everything they can to support student mental health with limited fiscal resources.

Generally, we are comfortable with Section 1 which would require every institution to form a mental health coalition. We believe the bill should be amended to include stakeholders from the college and the community. In addition, the language should be revised to require the coalition conduct a comprehensive assessment of the presence of mental health services and supports on each campus, not an evaluation of the effectiveness of these services and supports. The mental health coalition is not positioned to provide evaluation of quality of services, but rather existence of services.

We would ask that Section 2 of the bill be revised to eliminate the requirement that OHE and DMHAS develop an assessment tool for college and mental health services. These agencies are not equipped to perform this function without outside expertise in college mental health assisting on this project. We support the language requiring OHE and DMHAS to coordinate training workshops for state-wide mental health coalitions. This could benefit all institutions of higher education.

Section 4 of the bill requires campuses to establish and update their crisis intervention and management plan annually, including mental health resources. It would make better sense to assign the Coalitions established in section 1 of the bill the task of reviewing campus policies
and procedures related to student mental health as part of their work and that that review take place every four years, not every year.

We look forward to working with the Committee on this bill in an effort to support mental health services on campus without causing undue burden on fiscally stressed institutions.

**Substitute Language for Section 5 of SB 881**

Sec. 5. Subsection (l) of section 10a-34 of the general statutes is repealed and the following is substituted in lieu thereof (Effective July 1, 2021):

(l) Notwithstanding the provisions of subsections (b) to (j), inclusive, of this section and subject to the authority of the State Board of Education to regulate teacher education programs, [up to twelve] new programs of higher learning [in any academic year] and [any] program modifications proposed by an independent institution of higher education, as defined in section 10a-173, shall not be subject to approval by the Office of Higher Education, provided (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. Each institution that is exempt from program approval by the Office of Higher Education under this subsection shall file with the office (A) [an application for approval of any new program of higher learning in excess of twelve new programs in any academic year, (B)] a program actions form, as created by the office, prior to students enrolling in any new program of higher learning or any existing program subject to a program modification, and [(C)] (B) not later than July first, and annually thereafter, (i) until January 1, 2024, a list and brief description of any new programs of higher learning introduced by the institution in the preceding academic year and any existing programs of higher learning discontinued by the institution in the preceding academic year, (ii) the institution's current program approval process and all actions of the governing board concerning approval of any new program of higher learning, and (iii) the institution's financial responsibility composite score, as determined by the United States Department of Education, for the most recent fiscal year for which the data necessary for determining the score is available.