WASHINGTON HIGHER EDUCATION COORDINATING BOARD

January 2011

Proposed Changes to Program Approval Process

Discussion Item

No action is required at this time. Action anticipated May 2011.

Introduction

The Higher Education Coordinating Board (HECB) is responsible for overseeing state higher education resources, a role which includes the approval of new programs and moderate changes in existing programs. As stewards of state resources, the Board members must be able to assess the need for each program as well as the quality of the program. Boards must also avoid unwise duplication of programs while also ensuring access to a variety of programs throughout the state to meet residents' and the state's needs.

The current program approval process, while effective, could be more streamlined and efficient. A lighter touch on program *approval* that focuses more closely on the need for the program from student, employer, and the state's perspective could be coupled with a new program *review* process that would provide useful follow-up information about whether programs are growing effectively, where we have sufficient programs offerings and mix of programs, and where expansion is desirable.

Current

The current program and facility approval policies and procedures, adopted by the Board in September 2005, responded to statutory direction from the 2004 Legislature to place greater emphasis on student, employer, and community demand for degree programs. The Board again modified program approval policies in 2009, clarifying definitions and allowing a new abbreviated approval process for moderate degree changes. In November 2010, additional modifications addressed the approval of applied baccalaureate degrees offered by community and technical colleges, which were removed from "pilot" status by the Legislature as part of SSB 6355. The Board adopted a collaborative approval process with the State Board for Community and Technical Colleges in November 2010 (resolution 10-31).

The *System Design Plan*, approved by the Board in November 2009 and endorsed by the 2010 Legislature in SSB 6355, calls for a focus on "expand on demand" for both near- and long-term growth in higher education. The Plan represents a philosophy that is responsive to student,

community, and employer demand. To align with this philosophy, the Board's program approval and review policies need to place greater emphasis on demand for programs and their "fit" with campus mission, and regional and state needs. Changes in the HECB's program approval and review processes, which are broadly defined in RCW 28B.72.230, will help realize the intent of the *System Design Plan*.

Campus Feedback

As part of the *System Design Plan* implementation, HECB staff visited 13 campuses during the months of May through July 2010 including all public baccalaureate institutions, several branch campuses, independent institutions, and community colleges. The purpose of these visits was to gather information directly from campuses about their near-term and long-term plans for growth. In addition, we asked for feedback on our policies and procedures to identify ways in which we could better meet the needs of the institution and the state with the ultimate goal of better serving students.

During these visits we heard support for the direction of the *System Design Plan*, including greater emphasis on local and regional demand, an inclusive process to review applied baccalaureate degrees at the community and technical colleges, a formal process for dealing with conflicting demand evidence and concerns about program duplication, and a streamlined program review process.

In response to these issues, staff have identified several key changes in program and facility approval policy discussed below. These proposed changes, as well as program review changes to be discussed at the March meeting, will be refined over the coming months as we work with our stakeholders to develop a final recommendation for the Board to consider at the May 2011 meeting.

Proposed Changes to the HECB's Program Approval Process

To implement a program approval process that is less bureaucratic and places more emphasis on the criteria of demand, staff are proposing changes in existing policies and procedures. These include the following:

1) Advance planning notice for new degree program development, and alignment of initial proposed program requests with the budget process.
2) Changes to the two-step degree approval process.
3) A procedure to address concerns about insufficient demand or unnecessary program duplication.
4) Changes to the Moderate Degree Change process.
5) A streamlined approval process in which the HECB may request proposals for programs to meet an identified regional or state need.
6) Regular, published deadlines for submission and review.

7) Changes to the curriculum review process.
8) Definition of faculty qualifications.
9) Reduced reporting requirements for contracts to offer programs with community and technical colleges.

Advance Planning Notice for New Degree Program Development and Alignment with Budget Requests

To help the HECB plan more efficiently for new programs, institutions would be asked to:

- Provide early information about planned programs. Institutions would submit a very brief description (100 words) of programs they intend to propose during the biennium during even numbered years on the same schedule as the proposed institutional budgets.
- In odd numbered years, institutions would provide an updated program list of additions and deletions for the second year of the biennium along with their supplemental budget materials.

Rationale: In our effort to streamline the approval process in 2005, we lost a key planning document that helped us anticipate program growth and direct system growth.

Prior to 2005, institutions submitted plans outlining programs for which they intended to seek approval over the next two years. The procedure was replaced with the current planning notice procedure because accepting pre-proposals in batches every two years appeared unresponsive to emergent needs. However, the unintended consequence was that staff and the Board lost the higher-level overview of programs institutions were submitting. This loss of perspective changed the Board's ability to make strategic decisions about programs, to one of making more incremental decisions that lacked the broader institutional and system level context.

While the HECB no longer receives advance notice of planned programs on a regular schedule, the institutions have maintained an informal process to share plans for new programs through the "ICAPP grid," which includes the expected timeline for submission. Formalizing this existing planning process would improve staff's ability to anticipate program approval volume and consider individual proposals in a larger context. Linking the collection of these plans to the budget cycle will help inform budget recommendations, including the need for planning monies and additional resources. Finally, linking plans to the budget would enable the HECB to better understand the planned growth of the institutions over the biennium.

Changes to the Two-step Approval Process

The current Planning Notice of Intent (PNOI) requirement would be eliminated and replaced by a two-part approval process (see flow chart in appendix A). Part I of the degree approval process would document the need for the program and alignment with institutional mission, and address

any program duplication concerns. In Part 1, institutions would submit a proposal cover sheet similar to the current cover sheet including the following sections of the current proposal outline:

- Relationship to Institutional Role, Mission, Program Priorities, and the Strategic Master Plan for Higher Education.
- Documentation of need for the program.
- Relationship to other Institutions.

Staff would determine whether need justifies further development of the program proposal. If need does exist, then the institution would submit the remaining elements of the proposal as Part II. Institutions would not re-submit need information already submitted in Part I.

Rationale: The current process fosters a duplication of effort (and generates some confusion) for institutions. Under the current two-step approval process, staff assess demand twice. The first time is a cursory assessment of demand to determine whether additional planning is warranted, followed by a second, more detailed analysis that occurs when the full proposal is submitted. In practice, institutions are doing a great deal of demand analysis at the time of the PNOI. Positioning demand analysis earlier in the review process would allow time for thorough discussion and negotiation when concerns about demand are raised.

Addressing Concerns about Insufficient Need or Unnecessary Program Duplication

When institutions (public or private) raise concerns about program duplication that are not satisfied through staff discussion and analysis, HECB staff would take the following steps to resolve concerns:

- HECB staff would first ask institutions to attempt to resolve the issue among themselves.
- If unsuccessful, HECB staff would then facilitate a discussion between the parties at the HECB office in Olympia.
- If the parties are still unable to resolve the issues, HECB staff would take the matter to the Education Committee of the Board, which could resolve the issue at that time or refer the matter to the full Board for action.

Rationale: While uncommon, there are instances where concerns about a program are raised and greater input and discussion is required. The current policies do not provide for a dispute resolution process so these have been handled on a case-by-case basis. The goal of this change is to provide a process for concerns to be addressed in a fair and consistent manner.

Changes to the Moderate Degree Change Process

The Moderate Degree Change policy was adopted by the Board in March 2009. Since approval of the policy, the Board has acted on 15 Moderate Degree Change proposals. The majority of these changes have been changes that involve little or no new resources and represent only minor changes to curriculum. Changes include:

- Conversions of existing degree options, specializations, or concentrations to degrees (e.g. conversion of options within a Bachelor of Arts degree to separate BA degrees).
- Consolidation of two or more existing degrees into a single new degree (e.g. consolidation of two separate Ph.D. degrees into a single Ph.D. degree).

Under the revised policies and procedures, approval of these moderate changes would be delegated to HECB staff. As with the current policy, a program could be referred to full proposal review, if the change is more than "moderate" or if concerns arise during the review or comment period. The revised policy also allows for the use of the Moderate Degree Change process for changes in the level of an existing degree program's degree designation (e.g. upgrading a professional bachelor's degree to a master's degree in response to a requirement by a licensing authority) or changes that do not fall into one of these categories but represent a similar kind of reasonable, moderate change. In these cases the institution, in consultation with HECB staff, may still submit the proposal using the Moderate Degree Change format. However, the list would be reviewed by the Education Committee on a quarterly basis and then taken to the full Board for approval.

Rationale: In many cases programmatic changes do not represent a significant change to the program curriculum, faculty resources, or student population. For example, conversion of an existing option to a major usually involves the same faculty, very few if any additional new courses, and typically draws the same types of students. Because these programs are normally a continuation of an existing program under a new name, they represent a low risk of state resources; and therefore, Board action is an unnecessary step.

HECB Initiated Program Development

Under current state law and policy, the HECB periodically conducts an analysis of state higher education needs that takes into consideration student, employer, and community demand. As described above, the shift in philosophy that came out of the *System Design Plan* was to move toward more proactive planning for regional and state-wide needs by the HECB. To that end, HECB staff would engage in more in-depth analysis of demand for particular programs and develop requests for proposals for institutions to meet identified needs. Because demand would already be established, institutions submitting a proposal to the HECB would not need to document demand for the program. Part 1 of the application would focus on meeting identified needs and relationship to mission and program strengths. HECB staff, with advice of an advisory panel when appropriate, would select the program deemed best able to meet identified needs and forward that proposal to the Education Committee and full Board for approval.

Program Proposal Deadlines

Deadlines for submitting Part 1 (demand) and Part 2 (full proposal) would be published for the biennium. HECB staff will review programs proposals on a quarterly basis.

- Part 1 is due approximately nine months prior to the Board meeting at which proposal is reviewed.
- Part 2 is due approximately three months prior to the full Board meeting at which the proposed program is reviewed.

HECB staff will provide a calendar of program approval deadlines for the biennium when budget guidelines are released. The calendar will be updated with HECB Board meetings and Education Committee meetings when those are available.

Rationale: Developing clear and consistent deadlines will benefit all parties. The deadlines will ensure that the HECB is able to dedicate necessary staff resources to ensure timely consideration of new program proposals. Clear timelines also help institutions and faculty set potential start dates, consider faculty and staff resources, and other critical issues in program planning and implementation. The change would also help ensure that stakeholders have ample time to comment on programs.

Changes to the Curriculum Review Process

The staff review will place less emphasis on program curriculum than in the current process. Staff already rely heavily on external reviewer comments to affirm curricular quality. A good deal of staff effort, however, is currently spent on analysis of program curriculum and reviewer comments. As part of the changes to program approval, HECB staff will spend far less time re-analyzing this information. HECB staff will rely on the external reviewers' content area expertise to assess whether a program demonstrates a coherent design with appropriate breadth, depth, and sequencing of courses (including prerequisites). In addition, reviewers will be asked to comment on student learning outcomes, program and student assessment, and whether the degree title is consistent with the curriculum offered and clear to students.

If staff have concerns or if the reviewers' feedback conflict, then staff may request that the institution seek an additional review of the program, or staff may solicit a review from an expert independent of the institution.

Staff will continue to review institutions' plans for program-specific accreditation, faculty qualifications (discussed further below), student and program assessment plans, and plans for transfer and articulation.

Rationale: HECB staff are not experts on curriculum and currently rely heavily on external reviewers for feedback on program quality, depth and breadth. The intent of this change is to reduce the number of follow-up questions between the HECB staff and program planners by asking for a thorough review from content experts, and more readily engaging additional content experts when concerns are identified.

Define Faculty Qualifications

The current policies and procedures do not define faculty qualifications. In general, staff analysis has been based on a general working definition of appropriate degree level and critical mass of permanent faculty. The revised policy would require that faculty:

- Be professionally prepared and graduates of accredited institutions.
- Be sufficient in number and kind, and in the proportion of part- and full-time positions to sustain rigorous courses, programs, and services.
- Teaching at the baccalaureate and master's level must be prepared at least one level higher than the degree they are preparing students for. Faculty teaching in doctoral and professional programs must have an appropriate terminal degree.

Rationale: In a few instances, questions of faculty qualifications have arisen during the program approval process. For the public sector we have not clearly defined qualifications of faculty, nor does the Northwest Commission on Colleges and Universities (NWCCU). While, there is general agreement about typical faculty qualifications, we find that use of a definition would provide greater guidance to institutions and stakeholders. This approach has worked well in our degree authorization standards (WAC 250-61-100).

Reduce Requirements for Contracts (sections A-9 and A-10)

Currently, the HECB is required to approve certain contracts between public and private institutions and community and technical colleges to deliver programs and/or collaborate in program delivery under two separate policies. In both instances authority for approval is delegated to HECB staff. Also, in both cases the collaborating programs are already subject to approval by the HECB through program approval or degree authorization. The current requirement causes a good deal of confusion, and in some cases, duplication of effort. The proposed change to the policies would reaffirm that programs offered at a given site are subject to appropriate approvals but would remove the requirement that HECB review the actual contracts in advance. Rather, the HECB would ask for a notification of the agreement and a copy of the final contract.

Rationale: The change affects two policy areas. The first deals with approval of agreements between community or technical colleges and selected public baccalaureate institutions related to a pilot program authorized in statute (RCW 28B.50.820). The status of the pilot program does not change, but funding outlined in the pilot is expanded outside the pilot program. The second policy is related to partnerships between community and technical colleges and private institutions (RCW 28B.76.230). In both cases there already exists other approval requirements for programs operating on a community college campus and additional approval of the contract represents a duplication of effort. However, notification of the agreement does provide an important check to ensure approval or authorization procedures are being followed.

Proposed Changes to Approval of Off-campus Facilities and Addition of Approval of Change of Mission

The HECB's *System Design Plan* lays out a detailed approach for the approval of new facilities as well as changes to the mission. The existing approval policies need to be modified to align with the *System Design Plan*, as described below.

Guiding Principles for System Expansion and Optimization

Seven principles provide a framework to maximize degree production capacity from the current higher education system while also providing a way to facilitate new expansion.

1. The interests and needs of current and future students should be one of the primary considerations in deciding whether, and how, to expand or revise higher education services.
2. Investments in higher education should advance the state's economic vitality, innovation, and job growth, including meeting the high demand needs of the state.
3. Washington should restore and further invest in its higher education system to preserve and build upon its excellence and productivity and optimize opportunities for future generations.
4. Major new investments in expansion to meet the *HECB Strategic Master Plan* degree goals should first leverage existing missions, institutions, partnerships, collaborations, and educational delivery models.
5. Washington should place an early emphasis on policies that will raise educational attainment in underserved populations and underserved regions of the state.
6. Incentives for innovation in outreach, access and completion, and alternative program delivery should be developed.
7. Washington should invest in online and hybrid instructional delivery to transform higher education so that it is better positioned to meet changing technological, cultural and economic forces, improve the efficiency and quality of higher education, and provide greater access for all students, particularly those place-bound and geographically isolated.

Proposals for Major Expansion

Proposals for major expansion would be subject to a new review process by the state and HECB. This process can be locally driven or HECB-initiated. (see "Chart B" in appendix B).

Locally-Driven

In a locally-driven proposal, institution(s) and/or the community would identify under-served areas or populations or high demand program areas to be targeted for expansion and submit a proposal to the HECB documenting the scope of the project and its ability to "expand on demand." The HECB would evaluate the proposal and make a recommendation to the Legislature.

Each proposal would be evaluated using the Guiding Principles for the System Design Plan listed above and the following criteria:

- The specific scope of the project (e.g. large vs. small capital investment needs, number of FTE, and programs).
- Sustainable financial plan.
- Response to the state's and regional economic/workforce needs.
- Extent to which existing resources are leveraged.
- Near-term goals: current FTE to support the proposed programs/ institutions/innovations, and 5-year projections.
- Long-term goals: plans to accommodate expected growth over the next 20 years.
- Extent to which new or existing partnerships and collaborations are part of the proposals.
- Feasibility of any proposed innovations (three-year programs, joint facility use, technology, alternative calendar, etc.) to increase degree production.

HECB-Initiated

A second path for major higher education expansion would be a competitive Request for Proposal (RFP) process initiated by the HECB. The HECB would identify under-served areas or populations, or high demand program areas and release an RFP to the higher education system. Proposals would be evaluated using the same process as that in the locally-driven approach, with the HECB again making its recommendation to the Legislature for approval.

In both paths, HECB-initiated or locally-driven, proposals must respond to state and regional economic development and workforce and innovation needs. But the process would also include a way to prompt innovation and new thinking in delivering higher education through a new "Fund for Innovation" to support proposals that respond to the HECB's Master Plan priorities.

The *System Design Plan* also provided greater clarification on different levels of activity and associated investments that would indicate need to consider changes to mission or the need for additional capital investment ("Chart A" in appendix C). Activity levels are defined as follows:

- ***Teaching Site:***

  Teaching sites are authorized through HECB program approval, have a local focus, may be temporary or pilot sites, are typically a single institution, provide a limited number of programs or courses, require limited new operating funds, require no capital funds, and typically serve fewer than 150 FTE students.

- ***University Center:***

  Leased or Existing Space: These centers are authorized through HECB approval, have a regional focus, may be either a transitional or a permanent space, may include multiple institutions, provide a broader array of programs, may require operating funds, require no new capital funds, and typically serve 150 – 300 FTE students.

  With Capital Investment: These kind of centers are authorized through HECB approval and Legislative appropriation of funding, have a regional focus, may be either a transitional or a permanent space, may include multiple institutions, provide a broader array of programs, require new operating and capital funds, and typically serve 300 FTE students or more.

- ***System Campus:***
  A new system campus must be authorized by the Legislature and its programs must be approved by HECB. It must have a statewide focus, must be a permanent space, can be a single institution that may be new, must provide an array of programs, and requires new state operating and capital funds.

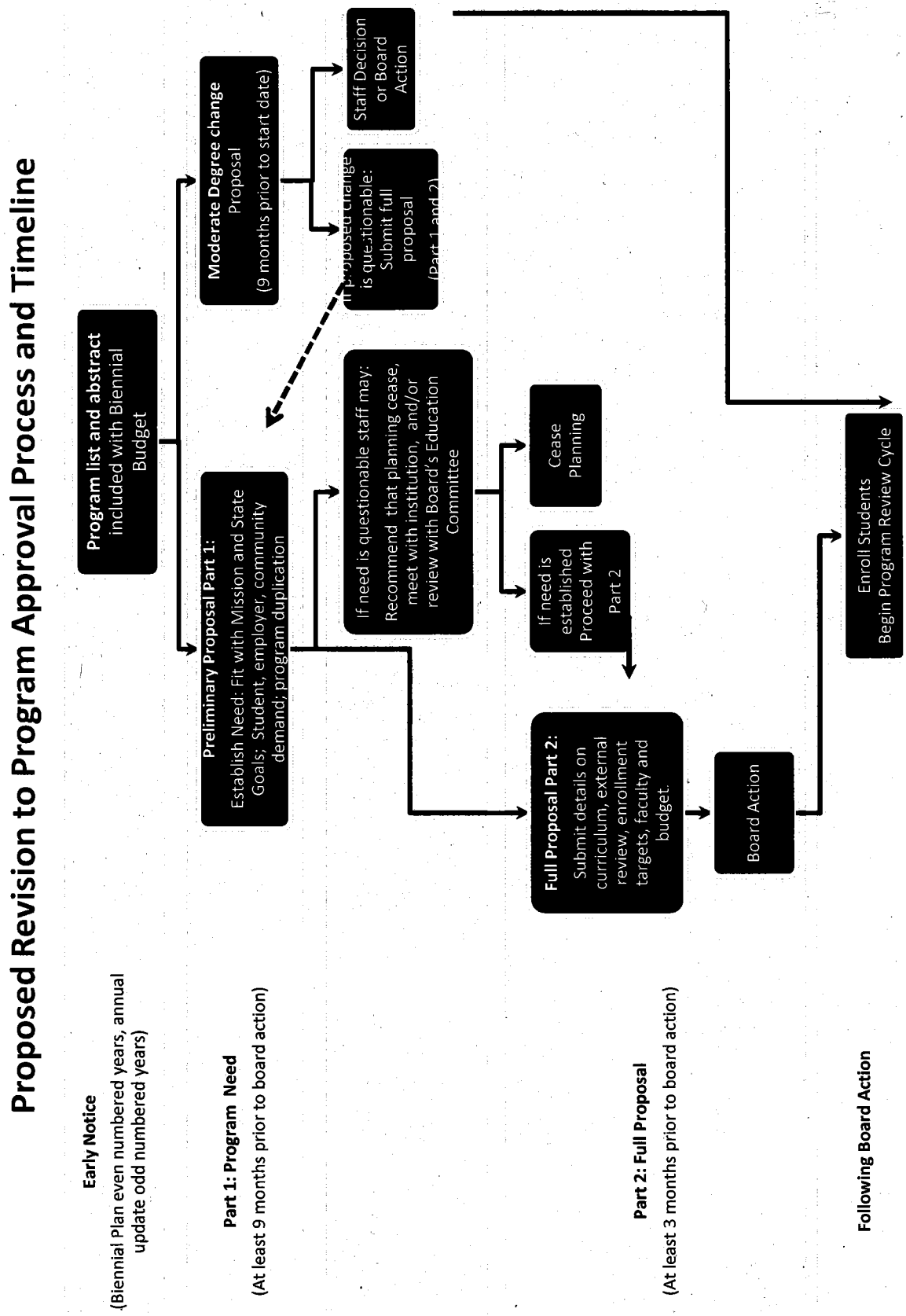
  There are three types of new campuses:

  - Branch: typically greater than 800 FTE students
  - Comprehensive: typically greater than 4,000 FTE students
  - Research: typically greater than 15,000 FTE students.

The changes to current program approval process outlined in this Board item achieve greater efficiencies for institutions as well as HECB staff, while refocusing the purpose of program approval on a critical element - demand for the programs. The changes also incorporate necessary adjustment to accommodate the *System Design Plan* concept of "expand on demand," particularly the RFP process that may be either HECB- or locally-initiated.

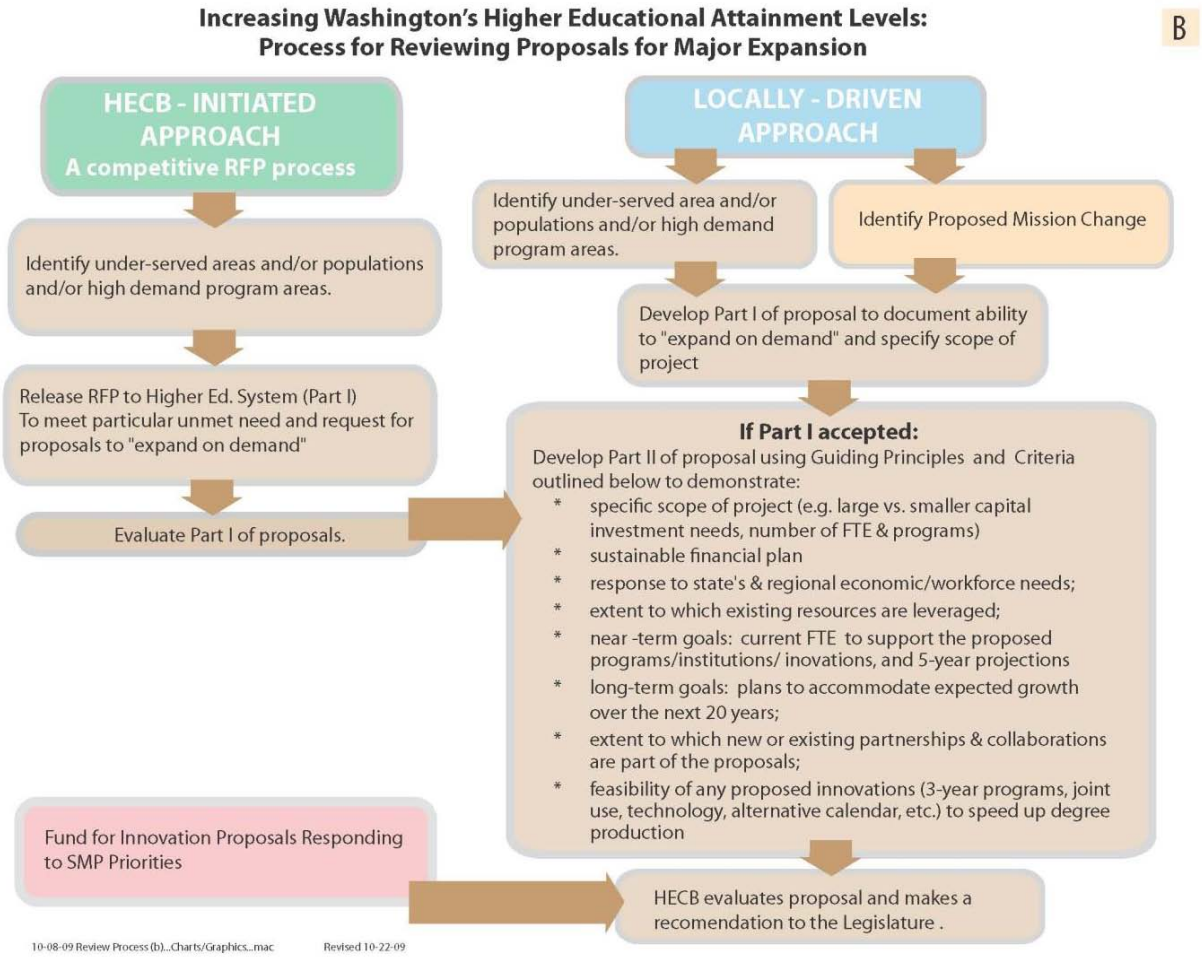
Combined with a more systematic program review process, which will be developed and presented to the Board later this year, the new program approval process allows for greater emphasis on demand for programs and their "fit" with campus mission and regional and state needs.

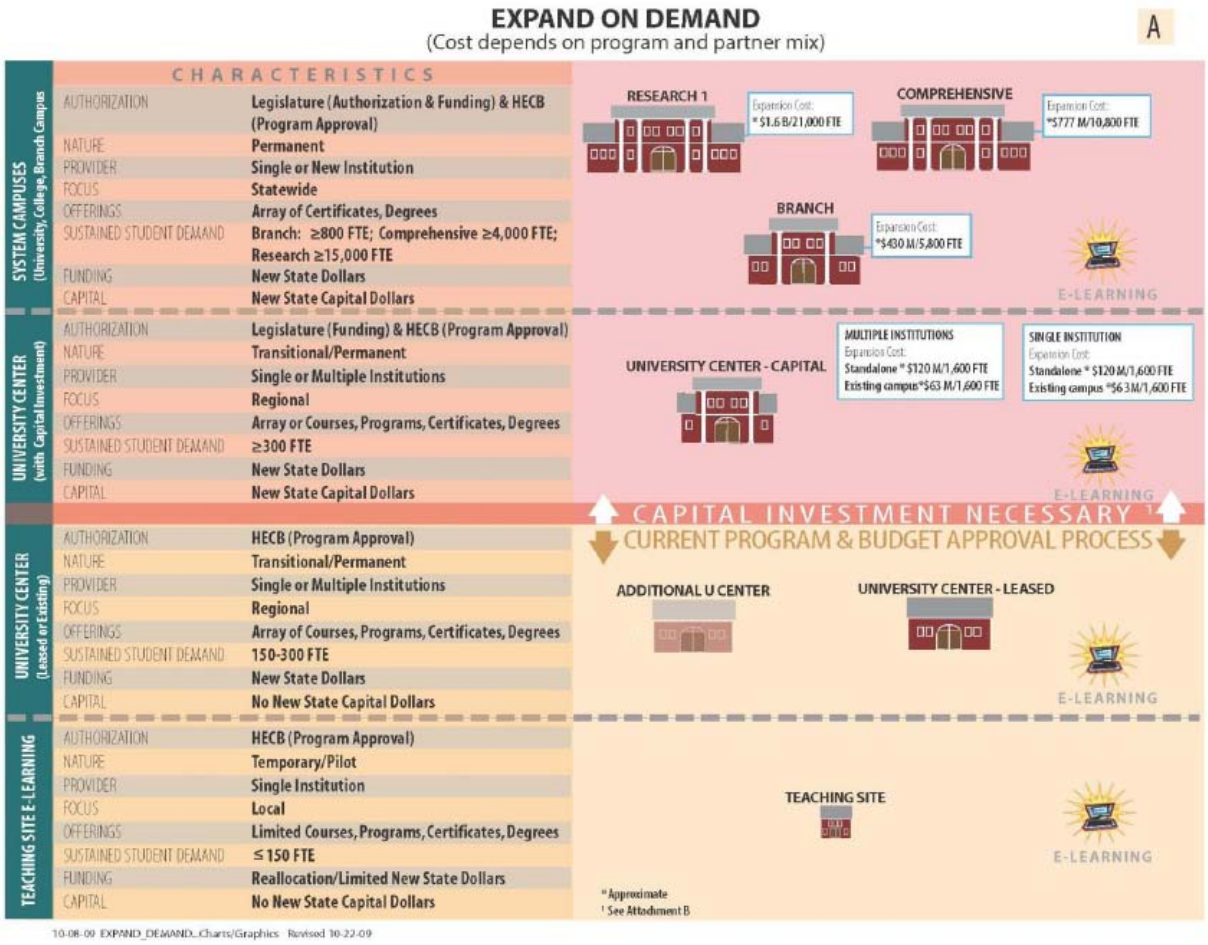
Appendix A:


Proposed Revision to Program Approval Process and Timeline
Early Notice
(Biennial Plan even numbered years, annual update odd numbered years)
Program list and abstract included with Biennial Budget
Part 1: Program Need
(At least 9 months prior to board action)
Moderate Degree change Proposal (9 months prior to start date)
Staff Decision or Board Action
If proposed change is questionable: Submit full proposal (Part 1 and 2)
Preliminary Proposal Part 1: Establish Need: Fit with Mission and State Goals; Student, employer, community demand; program duplication
If need is questionable staff may: Recommend that planning cease, meet with institution, and/or review with Board's Education Committee
Cease Planning
If need is established Proceed with Part 2
Part 2: Full Proposal
(At least 3 months prior to board action)
Full Proposal Part 2: Submit details on curriculum, external review, enrollment targets, faculty and budget.
Board Action
Following Board Action
Enroll Students Begin Program Review Cycle

Appendix B:

System Design "Chart B"



Appendix C

System Design "Chart A"