



THE MARYLAND GENERAL ASSEMBLY  
ANNAPOLIS, MARYLAND 21401-1991

**MEMORANDUM**

**To:** Members, Program Approval Process Workgroup

**From:** Nancy J. King, Senate Co-chair and Stephanie Smith, House Co-chair

**Date:** December 12, 2023

**Re:** DRAFT Recommendations

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**Program Approval Process Workgroup Recommendations**

**I. Operational Missions**

The workgroup devoted the September meeting to a discussion on institutions of higher education mission statements. The workgroup first heard from the Maryland Higher Education Commission (MHEC) on its current requirements for mission statement review. Under § 11-302 of the Education Article, each public institution of higher education is required to update their mission statement every four years for MHEC approval, immediately following the quadrennial review of the State Plan for Higher Education. The only metrics in statute related to mission statement review and approval is the requirement that MHEC determine whether the mission statement is consistent with the State Plan. During MHEC's last mission statement review in 2018, MHEC did not provide any comments to institutions or deny any institution's mission statement submission. At this meeting, the workgroup discussed how MHEC could have more developed metrics for mission statement review. For example, MHEC could be considering factors such as the unique contributions that historically Black colleges and universities (HBCUs) make to the State and to the country or whether a public institution of higher education has clearly defined their role in higher education system in the State.

The workgroup also heard about different statutory distinctions for public institutions of higher education in the State. In response to a question from a member of the workgroup, the Department of Legislative Services (DLS) prepared a document (**Appendix 1**) comparing the statutory distinctions, MHEC approved missions, and website mission statements of each public senior higher education institution. Most public senior higher education institutions use the same mission statement approved by MHEC, or a similar mission statement, on their website. Overall, most public senior higher education institutions are not adequately referencing their statutory distinctions in their mission statements or on their website. Review of the current law shows that

only 9 of 14 public senior higher education institutions have explicitly stated statutory distinctions. Members of the workgroup have expressed concern that some institutions do not have an expressly stated statutory distinction. For institutions that have specific statutory distinctions, which are utilized by MHEC in program review, the statutory distinction may be outdated and not reflective of the current role of the institution. The workgroup discussed whether the General Assembly, or another appointed workgroup, should consider clarifying statutory distinctions for all institutions on a more regular basis.

Also, during this meeting, the workgroup received a presentation about how other states review the mission statement of their institutions of higher education. Of the 16 states surveyed, 9 states require mission statement approval similar to Maryland. Only 3 states had detailed requirements in statute related to mission statements (*i.e.*, intended role of institution, academic and research goals, audiences served, geographic areas). Most states require mission statements to comply with a state plan, like Maryland.

There is concern that current institutional mission statements tend to be too vague and lacking in specificity about the strategic role and direction of the institution under the State's current structure of mission statement development and approval for public senior higher education institutions. Without clear and distinct roles for institutions of higher education in the State, institutions may engage in mission creep leading to an overexertion of State resources. However, the workgroup thought that establishing a new requirement for operational missions in lieu of mission statements would duplicate current internal practices of an institution and give MHEC authority in an area traditionally within the autonomy of each institution. Workgroup members determined that MHEC's current authority to review mission statements allows MHEC to be more involved and provide more robust comments to institutions when approving or disapproving their four-year mission statement submission.

**Recommendation 1: The workgroup does not recommend that MHEC require institutions to adopt operational mission statements for approval by MHEC.**

**Recommendation 2: The workgroup recommends that MHEC utilize their current authority to develop more detailed criteria for mission statement review of public institutions of higher education to ensure that mission statements are clearly defined and distinct between each institution. Examples of criteria in mission statement review could be the requirement that each institution clearly define the level of research of the public institution of higher education.**

**Recommendation 3: The workgroup recommends that after each mission statement review, MHEC submit a report to the House Appropriations Committee, the Senate Budget and Taxation Committee, and the Senate Education, Energy, and the Environment Committee on each approved mission statement and an analysis of each public institution of higher education's role in the State's system of higher education. The committees should use this report to ensure that the State is supporting each institution in meeting the needs of their approved mission statement.**

## **II. State Plan of Higher Education and State Workforce Development Needs**

The focus of the workgroup's October meeting was a discussion of how MHEC determines the workforce needs of the State. Section 11-105 of the Education Article requires MHEC, in consultation with the governing boards and agencies concerned with postsecondary education in the State, to develop and periodically update an overall plan to "coordinate the overall growth and development of postsecondary education in the State" called the State Plan for Higher Education. The State Plan must identify:

- the present and future needs for postsecondary education and research throughout the State;
- the present and future capabilities of the different institutions and agreements of postsecondary education in the State; and
- the long-range and short-range objectives and priorities for postsecondary education and methods and guidelines for achieving and maintaining them.

Once completed, the State Plan is submitted to the Governor and the General Assembly. The latest State Plan was submitted in 2022. The three main goals of the 2022 State Plan are to:

- (1) ensure equitable access to affordable and quality postsecondary education for all Maryland residents;
- (2) promote and implement practices and policies that will ensure student success; and
- (3) foster innovation in all aspects of Maryland higher education to improve access and student success.

The 2022 State Plan focuses on areas of student affordability; financial literacy; academic readiness; student populations; high-quality postsecondary education; improving systems for timely completion; ongoing lifelong learning; and promoting a culture of risk-taking. With respect to academic program review, the 2022 State Plan states that campuses should demonstrate a critical and compelling regional or statewide need before requesting a new academic program. The State Plan defined this need as:

- a need for the advancement and evolution of knowledge;
- societal needs;
- occupational and professional needs; and

- the need to strengthen and expand the capacity of HBCUs and to provide high quality and unique educational programs.

The 2022 State Plan also (1) makes a distinction between market demand and need; (2) encourages campuses to work with Commerce and local chambers of commerce to better understand local workforce needs and emerging fields; and (3) includes an analysis of the key industries in the State by Commerce.

Of the 16 comparison states examined by the workgroup, 13 have a state plan or document that governs the workforce development goals of the state. There is no consistent timeline among these states for updating the state plan and each state's review of the state plan range from 2 to 12 years. Some states, such as Mississippi, require its state plan to identify high demand fields and employment benchmarks. Other states, such as North Carolina, identify target industries. Some states also include regional or institutional goals. The workgroup also heard how other states compile workforce data and work more collaboratively with their labor departments and workforce councils and boards to define workforce needs. Some additional data sources other states use are vacancies and projections, wage data, and education/training needs.

After reviewing this information, the workgroup concluded that MHEC could make the State Plan more effective for institutions by including more targeted workforce need information. Due to a projected enrollment cliff in high school graduates beginning in 2025, it is imperative that public institutions of postsecondary education be extremely thoughtful in academic program development by focusing on programs in areas of need.

**Recommendation 4: The workgroup recommends that the State Plan should identify specific workforce needs, including regional needs, and the specific academic programs that institutions could develop to support these workforce needs.**

**Recommendation 5: The workgroup recommends that MHEC should update the State Plan for commission approval by August 2024. The workgroup recommends that MHEC utilize representatives from all segments of higher education, students, and members of the public in developing the 2024 State Plan.**

**Recommendation 6: The workgroup recommends that the next State Plan should require review and comment by the Legislative Policy Committee prior to the adoption of the State Plan by the commission.**

Additionally, the workgroup learned that because there is not a well-established relationship between MHEC, the Maryland Department of Labor (MDL), and Commerce, MHEC mostly goes it alone in figuring out the appropriate mechanisms and data regarding State workforce needs for the State Plan and in the program approval process. Due to this lack of coordination, all three State agencies use different standards to define different areas of workforce need. Overall, the State should be utilizing the resources of current State agencies devoted to identifying workforce needs. MDL and

Commerce should also be working with other agencies that have particular expertise in emerging fields to have the most accurate analysis of State and regional workforce needs.

**Recommendation 7: The workgroup recommends that MHEC, MDL, and Commerce should each have a specific position identification number dedicated to defining and identifying State and regional workforce needs.**

**Recommendation 8: The workgroup recommends that MHEC, MDL, and Commerce have common agreement on data sources and measurements and all institutions of higher education should have access to this data. MHEC and the commission should use this data as a baseline during the program approval process.**

### **III. Programmatic Plans**

Currently, the State has no requirement for institutions of higher education to collaborate with each other. In the past, MHEC's leadership made little substantive effort to encourage institutional collaboration.

In a memorandum created for workgroup members (Appendix 1), the Education Commission of the States compiled data on how different states encourage collaboration among institutions to ensure that there is not an oversaturation of similar degree programs. There is no best practices on how to encourage collaboration among institutions. Other states utilize a comment period or an objection period in the beginning stages of the program proposal process to get the perspective of other institutions to the proposed program. Most states require a notice of an intent to develop a new program prior to submitting a program for the coordinating body's approval to elicit questions, comments, and collaboration and provide notice to other institutions. A few states go further in requiring collaboration in a program proposal submission. For example, Minnesota requires proposals to include "alliances with other institutions of higher education". Alabama requires proposals to include plans to collaborate with other institutions. Mississippi requires that institutions within a certain geographic area of each other should explore collaboration in their proposal.

**Recommendation 9: After the adoption of the 2024 State Plan, the workgroup recommends that MHEC require all senior higher education institutions to submit a "Programmatic Plan" that would require senior higher education institutions to outline each graduate academic programs that the institution plans to submit by the end of the second year time period. MHEC should adopt a specific due date and review period of the Programmatic Plans.**

A Programmatic Plan would serve as formal notice to each senior higher education institution and MHEC of the direction an institution is planning on pursuing over the next two years related to the offering of graduate degree programs. It would not give preference or approval to a program but allow MHEC to facilitate collaboration among institutions interested in similar programs or among a proposing institution and an institution currently offering a similar

program. MHEC could also provide comments early to institutions if there is a concern MHEC has with the program, potentially saving an institution time and resources to address those concerns before embarking on the formal program approval process. Currently, MHEC is not involved in or aware early enough in the academic program development process of each institution to encourage effective collaboration between institutions.

**Recommendation 10: The workgroup recommends that MHEC develop an exception to the Programmatic Plan requirement for exigent circumstances. This process should only be used by institutions in rare circumstances that require quick adoption of a program and MHEC's process should encourage fairness and transparency.**

#### **IV. Collaborative Fund**

Institutions frequently commented during workgroup meetings that while institutions had a desire to collaborate, it was not always economically feasible for the institution.

**Recommendation 11: The workgroup recommends that the General Assembly create a collaborative fund that would be accessible for public institutions of higher education to fund efforts to collaborate with each other for the establishment of new graduate degree programs.**

The eligible expenses from the collaborative fund would be case by case, and MHEC should allow institutions to define which collaborative opportunities work for the institutions, but examples could include grants for:

- the salaries of faculty to work together to determine if collaboration is feasible for the institutions;
- costs associated with providing transportation for one institution to another institution for shared classes or facilities; or
- costs associated with sharing resources in research collaborations, student exchange programs, joint marketing or recruitment, faculty exchange programs, and online program collaborations.

Grants from a collaborative fund would be eligible for institutions after inclusion of the program in the institution's Programmatic Plan. The fund would prioritize collaborative efforts of institutions in similar geographic areas, but of different sizes. However, if an area of collaboration makes sense beyond the bounds of these requirements, to maximize State resources, expenses may be eligible from the fund.

While the State does have an educational interest in encouraging collaboration, workgroup members wanted to be clear that collaboration *will not be* a requirement of an institution. An

institution currently with a program is *not* required to collaborate with an institution proposing a program. Additionally, if MHEC determines that programs are duplicative during a program proposal and there is a State or regional workforce need for multiple programs, MHEC may not require an institution to collaborate with another institution for the new program to be approved. However, if each institution determines that collaborating works for their institution, the State would assist with paying those eligible costs.

## **V. Program Approval Objection Process**

At the August meeting of the workgroup, members heard a presentation from MHEC that included details on the program approval objection process. Under § 11-206.1 of the Education Article, MHEC must circulate the notice of an institution's intent to establish a new program within 30 days of the receipt of the notice. If an objection is filed, the commission must immediately notify the proposing institution's governing board and president. If an objection cannot be resolved within 30 days of the receipt of an objection, the commission must make a final determination on approval of the new program or a final recommendation on implementation for a private nonprofit institution of higher education. Under COMAR 13B.02.03.03, if the commission fails to act on a program proposal within 60 days after the submission of the program proposal to the commission, the program is officially approved without further action by the commission.

An institution may request review of a program proposal decision of the Secretary of Higher Education. COMAR 13B.02.03.28 describes the steps for a review by a commission. Within 10 days of the issuance of the Secretary's decision, a president seeking the commission's review of that decision must send a letter requesting review to the Secretary and the Commission Chair and, within 30 days, their full rationale in support of their request for review, including relevant supporting data. Within 20 days of receipt of notice of the request for review, the Secretary or Commission staff must submit to the Commission Chair its rationale in support of the decision and a copy is provided to the president seeking review. The Commission Chair must schedule a meeting to review the decision of the Secretary within 60 days of the issuance of the Secretary's decision. The Commission Chair may hold the review at a regularly scheduled or special meeting.

Between January 1, 2023, and December 1, 2023, MHEC received 143 new program approval submissions. Ten program approval submissions received an objection. Seven of objections were resolved without a hearing by the commission. Three program approval reviews, after an objection, received a hearing.<sup>1</sup> There was concern raised this interim by the Legislative Black Caucus about how the commission previously has only required a majority vote of Commission members present for a final action, and there was concern that the commission would discuss and take votes on an appeal in closed session.

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<sup>1</sup> After a review meeting, the Commission approved the proposed program. However, an advice letter from the Attorney General's office noted that the Commission's decision was void due to how the vote occurred. The proposing institution subsequently withdrew the proposal.

In response to a question from a workgroup member, DLS analyzed the timelines of other states related to program approval. (Appendix 1). Of all the states surveyed, New Jersey has a process most similar to Maryland in allowing for 30 days of review by institutions for objections or concerns and 30 days for a decision to be made by the Academic Issues Committee. Most states surveyed allow for more time for objections and review by a coordinating board. Additionally, many states have a more cyclical timeframe for program approval by only allowing programs to be submitted for approval during certain times of the year (for example, quarterly or annually) and the coordinating boards devote specific meetings in the board's annual schedule to review of proposed programs. Most of the states surveyed had an administrative procedures guide on the coordinating board's website with details related to the program approval process.

Workgroup members representing institutions in the State have stated that (1) MHEC's process for program review has not been transparent in the past and (2) MHEC has not followed its own specific deadlines related to review and approval. The workgroup members did not discuss specific changes to current process deadlines as, after analysis of comparison of other state processes, there seemed to be no best practice to among other states regarding deadlines. Institutions of higher education deserve clear timeframes, that are followed, for the review of an institution's proposed program so that institutions can be clear to students and stakeholders about the timely delivery of the proposed academic program and effective use of institutional resources in the development and delivery of academic programming.

**Recommendation 12:** The workgroup recommends that MHEC reexamine its statutory and regulatory deadlines for the program approval process to determine if those deadlines are meeting the needs of institutions and students in the State. The workgroup recommends that the General Assembly consider holding MHEC accountable if the department does not make progress on adhering to stated timelines and deadlines in the program approval process.

**Recommendation 13:** The workgroup recommends that MHEC conduct all discussions, deliberations, and votes of an appeal of a program approval decision in public session.

**Recommendation 14:** The workgroup recommends that a vote of the majority of the commissioners appointed to the commission be required to approve or disapprove a program approval decision.

**Recommendation 15:** The workgroup recommends that MHEC develop and adopt an administrative procedures guide for the department's program approval process by **XX** and prominently post the administrative procedures guide on the department's website.

## **VI. Unreasonable Duplication in Graduate Programs Analysis**

Under § 11-206.1 of the Education Article, MHEC must circulate the notice of an institution's intent to establish a new program within 30 days of the receipt of the notice. Within 30 days of receipt



of a notice of an institution's intent to establish a new program, the commission may file, or an institution of higher education in the State may file with the commission, an objection to the implementation of the proposed program. An objection may be based on:

- inconsistency of the proposed program with the institution's approved mission for a public institution of higher education and the mission statement published in the official catalog of a private nonprofit institution of higher education;
- not meeting a regional or statewide need consistent with the State Plan;
- unreasonable program duplication, which would cause demonstrable harm to another institution; or
- violation of the State's equal educational opportunity obligations under State and federal law.

At the August meeting of the workgroup, the workgroup heard from MHEC about how the department completes an analysis of unreasonable program duplication. MHEC focuses on unreasonable duplication in vocational/technical, occupational, graduate, and professional programs. Proposed programs in undergraduate core programs consisting of basic liberal arts and sciences disciplines are not considered unreasonably duplicative by the department. The workgroup did not give consideration to whether MHEC should make a change to this policy.

MHEC uses a three-part analysis for an unreasonable program duplication analysis – duplication, reasonableness, and demonstrable harm. First, MHEC determines if there is *duplication* of the proposed program and the current program of the objecting institution. In regulation, MHEC describes “considerations” the Secretary of Higher Education must make in determining duplication. At the August meeting, the department phrased these considerations differently than the description in regulation and offered additional considerations used by the department. Next, MHEC considers whether the duplication is *reasonable*. Although the department broke the duplication and unreasonable questions into two different analyses at the August meeting, department regulations combine these tests. The third part of the analysis is a determination on whether the *duplication will cause a demonstrable harm* to the objecting institution. At the August workgroup meeting, the department discussed factors the department considers when determining demonstrable harm. However, department regulations do not include these stated factors or any other factors that the department should consider in determining demonstrable harm.

Although the workgroup determined that MHEC has made great efforts to educate institutions about their analysis for unreasonable program duplication, the workgroup had concerns that these standards are not in regulation. Without adoption through the formal regulatory process, the program approval process appears to lack uniformity, consistency, and transparency in implementation. At most, the factors are described as “considerations” of the Secretary in regulation causing confusion about whether a specific factor or consideration receives more weight than another factor or consideration. Although the workgroup did not determine the factors for a duplication,

unreasonableness, or demonstrable harm, it does think that workforce need should be prioritized in an analysis of unreasonable duplication. The workgroup also thinks, consistent with *Fordice* decision, that an analysis of reasonableness should protect institutions currently with a program. Additionally, the workgroup had concerns that the department considers the test for “unreasonable duplication” and “unnecessary duplication” as the same test when they should be different distinct analyses.

**Recommendation 16:** The workgroup recommends that MHEC formally adopt the analysis for unreasonable program duplication in regulation including the specific criteria the department uses in the analyses. The workgroup recommends that the analyses adopted by the department make the distinction between unreasonable and unnecessary duplication. Additionally, the analysis should prioritize workforce needs, protection of existing programs if they are meeting workforce demand, and collaboration. For example, if there is a defined workforce need under the department’s baseline data and an institution currently with the program cannot or does not want to scale up to meet the need and cannot or does not want to collaborate with the proposing program, the proposed program should be approved.

## **VII. Criteria for a Full Program Review of a Substantial Modification to an Existing Program**

At the initial meeting of the workgroup meeting, MHEC discussed the criteria used to determine a full departmental review of a substantial modification to an existing academic program. Under § 11-206 of the Education Article, the governing body of an institution of postsecondary education must submit to the commission each proposal for a substantial modification of an existing program. MHEC defines “substantial modification” in regulation as a change of more than 33% of an existing program’s course work. While other states use a trigger of 50% or have standards related to how to determine if a change qualifies as a substantial modification, the department’s 33% standard felt arbitrary and difficult to quantify to workgroup members.

**Recommendation 17:** The workgroup recommends that MHEC, in collaboration with all institutions, find a consensus as to whether 33% is the appropriate standard to trigger a full program review of a substantial modification to an existing program. If MHEC finds that a new standard is more appropriate, MHEC should update their regulations by **XX** with a detailed explanation of the new standard.

## **VIII. Analysis of Recommendations and Advisory Committee**

**Recommendation 18:** The workgroup recommends that the Maryland General Assembly determine an appropriate time to review the implementation of the workgroup’s recommendations.

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**Recommendation 19: The workgroup recommends that the Maryland General Assembly add a Program Review Process Advisory Committee within MHEC to make recommendations to the commission on matters of program review and approval.**



## **Appendix 1**

### **Alabama**

#### **Is the coordinating board for higher education involved in program approval?**

Yes, Alabama Commission on Higher Education (ACHE) approves academic programs.

#### **What is the timeframe for the program approval process?**

Alabama follows the below timeline:

- (1) Submission of Notification of Intent to Submit a Proposal (NISP) – at least 2 months prior to proposal submission;
- (2) Institutional comments – within 3 weeks of receipt of NISP;
- (3) Preliminary meeting of ACHE staff to discuss comments and the program objectives in relation to the needs of the state; to consider any program duplication, and explore possible means of collaboration, and to evaluate the centrality of the program to the institution's mission and role – within 4 weeks of receipt of NISP;
- (4) Submission of Program Proposals – any time beyond 2 months of NISP submission;
- (5) Review of proposal by Council of Graduate Deans – 8 weeks;
- (6) Second meeting with ACHE staff to review questions and recommendations derived from the peer review and to reach agreement on any necessary proposal changes – within 2 weeks of peer review; and
- (7) Completion of ACHE staff recommendation and ACHE action on the program – within 2 months of peer review.

#### **What criteria is used for program approval?**

- (1) Relevance of Institutional;
- (2) Role;
- (3) Need for the Program;
- (4) Collaboration;
- (5) Program Objectives and Content;

- (6) Student Availability and Demand;
- (7) Program Completion Requirements;
- (8) Institutional Context;
- (9) Program Administration;
- (10) Accreditation;
- (11) Resources to Support the Program;
- (12) Financial Support;
- (13) Distance Education Technology; and
- (14) Program Viability.

## Arkansas

### **Is the coordinating board for higher education involved in program approval?**

Yes, Arkansas Department of Higher Education (ADHE) approves academic programs.

### **What is the timeframe for the program approval process?**

A Letter of Intent (LOI) informs the Coordinating Board that an institution seeks to offer a new program or organizational unit that requires a proposal and Coordinating Board approval.

The Coordinating Board meets 4 times. For the April Coordinating Board decision meeting, the “letter of intent” is due January 1, proposals are due February 1, and the institutional comment period ends March 1.

### **What criteria is used for program approval?**

Arkansas Code Annotated §6-61-208 charges the Arkansas Higher Education Coordinating Board (AHECB) with the responsibility to evaluate proposals for all new units of instruction, research, and public service, consistent with established role and scope designations, and to approve programs and organizational units based on established policies.

ADHE staff may engage a maximum of three in-state or out-of-state experts in selected fields of study to assist with the review of proposals for undergraduate and graduate programs. The review team will submit a written report to ADHE that evaluates the proposed programs in terms of the need for graduates, student demand and interest, appropriateness of the curricula, and adequacy of institutional resources. Typically, a campus visit is required.

## California

### **Is the coordinating board for higher education involved in program approval?**

No, there is no State governing body. California State University (CSU) approves academic programs for the system.

### **What is the timeframe for the program approval process?**

Proposals are submitted the academic year preceding implementation.

### **What criteria is used for program approval?**

CSU considers the following in the review of a proposed CSU degree program:

- (1) Faculty (Does the faculty appear qualified to offer this program and at this level? Does the faculty expertise span all appropriate specializations, and are there sufficient faculty members for the projected size of the program? Do they appear to have appropriate research or professional experience? Are the arrangements for administering the program sufficient to ensure that it will operate effectively? )
- (2) Curriculum (Does the curriculum have appropriate breadth, depth, and coherence for an undergraduate or a graduate program in this field? Is it up to date, incorporating the most recent developments in the field? Is it consistent with any pertinent recommendations of professional organizations? Is it responsive to employment opportunities for graduates? If it is a baccalaureate program, would it constitute desirable preparation for graduate or doctoral study in the fields indicated in the proposal?)
- (3) Resources (Does the description of facilities, equipment, and information resources indicate that the campus has the resources (or reliable access to resources) that will be needed for a high-quality program? If not, what information would be minimally necessary to assure that the resources are adequate?)
- (4) Assessment of Program Quality and Student Learning (Does the proposal provide an assessment plan that identifies program and student learning goals? Do the student learning outcomes match with the curriculum? Are goals measurable, and will the assessment process be manageable? Is the process meaningful, with assessment results be used to influence changes in the curriculum or pedagogy?)
- (5) State Need and Student Demand (Do you believe that a program of this kind is needed in California? Is there convincing evidence provided in the proposal to demonstrate student interest in the program and employer demand for graduates? Are the sources of information on need current and credible? If you think that the information on need for the program is not adequate, what other information might we suggest that the campuses include in the proposal? )



## Delaware

**Is the coordinating board for higher education involved in program approval?**

No.

**What is the timeframe for the program approval process?**

n/a.

**What criteria is used for program approval?**

n/a.

## **Louisiana**

### **Is the coordinating board for higher education involved in program approval?**

Yes, the Louisiana Board of Regents approves academic programs.

### **What is the timeframe for the program approval process?**

Each September, the Board of Regents will approve the annual Academic Plans of the institutions.

Once approved, full program proposals may be submitted anytime to the Board of Regents for full program approval.

### **What criteria is used for program approval?**

Academic Plans are circulated to Chief Academic Officers and labor market representatives statewide for review and comment. Feedback from the statewide review may include support, recommendations, or substantive feedback to the proposed program based on need, mission, or duplication. Staff will attempt to resolve challenges through discussion among interested parties; unresolved issues will be presented to the Board for a final decision.

Proposals for all graduate degrees (master's and doctoral) and for highly technical and/or selective baccalaureate degrees require review by an external consultant.

### **Guidelines for Academic Program Evaluation that assessors use are:**

- (1) Program Design;
- (2) Need;
- (3) Students;
- (4) Faculty;
- (5) Resources;
- (6) Administration;
- (7) Accreditation;
- (8) Related Fields;
- (9) Costs; and
- (10) General Assessment, Comments, and Suggestions.

## Massachusetts

### **Is the coordinating board for higher education involved in program approval?**

Yes, the Department of Higher Education approves academic programs.

### **What is the timeframe for the program approval process?**

Massachusetts approves public programs at the LOI stage of development.

#### *Phase I:*

LOI from an institution may be submitted annually from September 15 to May 15.

An LOI proposal will be subject to a 15-business-day period of review.

Once an LOI is validated and deemed complete, it is circulated by the Deputy Commissioner for Academic Affairs and Student Success to Academic Affairs Committee (AAC) and Strategic Planning Committee (SPC) members, public campus Chief Academic Officers (CAOs) and to AICUM representatives for comment. The comment period extends for 20 business days.

At the end of this timeframe, all comments are reviewed by staff and sent to the LOI institution's CAO, who then has 20 business days to submit a written response to the Deputy.

An LOI is brought forward either within 20 business days of receiving the institution's response or at the next board meeting.

#### *Phase II:*

Phase II full academic proposals must be submitted within 2 years of Board of Higher Education approval of the Phase I LOI.

A proposed program template is validated and reviewed for completion within 15 business days of receipt. As noted above, the campus can expect staff to provide information regarding any further data that are needed for the proposal to be deemed complete. This communication resets the timeframe. Once the campus has responded by submitting the additional data, the 15-business-day clock begins anew.

Once validated and deemed complete, Fast Track proposals are forwarded to the commissioner with a recommendation for action within 20 business days.

Implementation of a new academic program should occur no later than the second fall semester following approval. If implementation is delayed beyond that time, the institution must provide an explanation to the commissioner and either request a new implementation date or provide a rationale not to offer the program.

**What criteria is used for program approval?**

There are three major sections to the LOI proposal:

- (1) Alignment with Massachusetts goals for higher education;
- (2) Alignment with the current campus strategic plan and mission of the institution; and
- (3) Alignment with operational and financial objectives of the institution.

## **Minnesota**

### **Is the coordinating board for higher education involved in program approval?**

No, the governing body, Minnesota State Colleges and Universities Board of Trustees, approves academic programs.

### **What is the timeframe for the program approval process?**

A Letter of Inquiry must be sent 6 months to 1 year prior to the expected program implementation date.

Notice of Intent (NOI) will be posted on the Minnesota state website for a 20-day review and comment period. Any comments must be addressed by the campus proposing the new program within 10 days. Campuses who submitted comments or concerns will have 10 days to respond to the additional information provided.

The Academic Programs and Quality Assurance Unit will make a determination about whether the applicant may proceed with the submission of a new program application or that they may not submit a new program application.

Appeals can be made within 30 days of a decision. The unit has 60 days to review the appeal. Within 30 days of receipt of the recommendation from the Academic Affairs Council, the Senior Vice Chancellor for Academic and Student Affairs shall make a final determination regarding disposition of the appeal.

### **What criteria is used for program approval?**

The NOI must include:

- (1) Student interest;
- (2) Labor market data documenting need for program;
- (3) Catalog description;
- (4) Curriculum structure and required courses;
- (5) Credit length;
- (6) Degree award;
- (7) CIP code recommendation;
- (8) Delivery mode;

- (9) Location;
- (10) Program learning outcomes; and
- (11) Equity 2030 considerations.

Appeal review shall be based on:

- (1) Program duplication;
- (2) Student interest;
- (3) Labor market need;
- (4) Program service area need;
- (5) Program justification;
- (6) Equity 2030 considerations;
- (7) Public comments / concerns; and
- (8) Other relevant information.

## Mississippi

### **Is the coordinating board for higher education involved in program approval?**

No, the governing body, Mississippi Institutions of Higher Learning, approves academic programs.

### **What is the timeframe for the program approval process?**

A university shall submit a New Academic Degree Program Proposal program to the Office of Academic Student Affairs (OASA) 2 months prior to the board meeting which action is expected.

The request is evaluated by OASA during the two months prior to the board meeting and is placed on the agenda one month prior to the board meeting at which action is expected.

If the Associate Commissioner of Academic and Student Affairs renders a positive decision, the request will be placed on the Board of Trustees' Regular Agenda.

After approved, the institution shall enroll students within 2 academic years of approval. If the institution has not enrolled students by the end of the second academic year, board approval is rescinded.

#### *Routine Review:*

Institution shall provide information about proposed program to the department.

Department staff will verify and post the proposal on the department's website to allow for 20 days of public review and comment.

The proposing public institution will address comments and feedback received. Once all concerns are resolved, the commissioner will recommend provisional approval of the program for a period of 5 years. Institutions have 2 years to implement the program once approved.

Requests submitted by the first of the month will be reviewed and processed, and in most cases, institutions will be notified by the end of the same month.

At the end of the 5-year provisional approval period, the department will review the program's viability to determine whether the coordinating board's provisional approval should become unconditional, remain provisional pending further review in 2 years, or be terminated.

### *Comprehensive Review:*

All proposals must be submitted to the coordinating board by July 1 of each year. Evaluation decisions are announced in September and final decisions to approve programs will be made in February.

Department staff will verify and post the proposal on the department's website to allow for 20 days of public review and comment.

Department staff, in consultation with the external review team will review a complete proposal and provide feedback to the institution.

The institution will address comments and feedback received. Once all concerns are resolved, the commissioner will recommend provisional approval of the program for a period of 5 years.

The institution must establish clearly defined performance goals to be achieved during the provisional implementation period and submit an annual report to the coordinating board on specified factors.

### **What criteria is used for program approval?**

It is expected that all new degree programs:

- (1) Will be consistent with the role and mission of the institution;
- (2) Will be considered only when all university degree programs within the discipline have professional accreditation (if available) and have met the minimum standards of productivity;
- (3) Will be considered only when professional accreditation will be sought for this program (if available);
- (4) Will require no more than 124 credit hours towards graduation if the request is for an undergraduate program, unless it meets the standard for exception;
- (5) Will be consistent with the curricula of similar programs in this discipline and will meet any licensing or certification needs;
- (6) Will meet local, state, regional, and national educational, societal, or cultural needs;
- (7) Will not be unnecessarily duplicative of other programs within the System;
- (8) Will be funded through documented resources; and



- (9) Will include procedures for program effectiveness.

For a proposed program to be considered through routine review, it must meet the following criteria:

- (1) The program is clearly within the institution's approved mission;
- (2) The program will not unnecessarily duplicate an existing program in the applicable geographic area;
- (3) The program will be offered at the main campus or at a coordinating board – approved off-site location;
- (4) The program will build on existing programs and faculty expertise; and
- (5) The cost to launch the program will be minimal and within the institution's current operating budget.

*Comprehensive Review Criteria:*

- (1) Evidence of good faith effort to explore the feasibility of collaboration with other institutions whose mission or service region encompass the proposed program;
- (2) Evidence that the offering institution is contributing substantially to the coordinating board's Blueprint for Higher Education;
- (3) Evidence of institutional capacity to launch the program in a high-quality manner including an external review, a comprehensive cost/revenue analysis, evidence indicating there is sufficient student interest and capacity to support the program, sufficient capacity to support external learning requirements, and a description of the accreditation requirements and the institution's plan for seeking accreditation; and
- (4) Evidence that the proposed program is needed, including not unnecessarily duplicative of other programs in the applicable geographic area and a rigorous workforce analysis demonstrating program need.

## New Jersey

### **Is the coordinating board for higher education involved in program approval?**

Yes, the New Jersey President's Council (NJPC) approves academic programs.

### **What is the timeframe for the program approval process?**

The institution must submit program announcements to presidents of all New Jersey institutions of higher education and the Office of the Secretary of Higher Education.

Objections or concerns to the program announcement must be communicated to the proposing institutions within 30 days of receipt. The objecting and proposing institutions are expected to resolve differences informally in furtherance of institutional cooperation, if not resolution, materials re objecting submitted to NJPC for review.

If the Academic Issues Committee (AIC) determines that there are outstanding issues and/or questions remaining regarding the new academic degree program proposal, the proposal will be returned to the institution for modification and/or correction before resubmission. AIC must provide specific reasons for the return of the propose.

If AIC determines that there are no outstanding issues and/or questions remaining regarding the proposal, it will make a favorable recommendation to the NJPC. If NJPC concurs, the result of a favorable review will be conveyed to the proposing institution within fifteen days and the program may be implemented.

Office of the Secretary of Higher Education is responsible for final administrative decisions.

### **What criteria is used for program approval?**

The four standards for final program approval, as defined in the regulations are:

- (1) Sufficient academic quality;
- (2) Sufficient evidence of labor market demand for the program;
- (3) Duplication with comparable programs of study in the State; and
- (4) Whether the proposed new program will require significant additional State resources)

(Each standard has specific criteria set forth in statute.)

New academic degree program proposals require engagement of an external independent consultant who provides a report.

## North Carolina

### Is the coordinating board for higher education involved in program approval?

No, the Governing Board, University of North Carolina (UNC) Board of Governors, approves academic programs in the UNC System only.

### What is the timeframe for the program approval process?

- (1) LOI is submitted to UNC System office (office acknowledges receipt within 48 weeks).
- (2) UNC responds with approval to move forward or with questions (within 4 weeks).
- (3) A. Master Degrees – UNC office approves and invites submission of Request to Establish (RTE).  
  
B. Doctoral Degrees – Completed LOI is forwarded to UNC Graduate Council for review/discussion at next quarterly meeting. Within 2 weeks council votes to authorize permission to plan the new doctoral program. If the council approves, UNC System Office approves and invites submission of RTE.
- (4) Campus submits RTE within 4 months.
- (5) Institution submits RTE to UNC System Office (acknowledges recipient within 48 hours).
- (6) UNC System responds that the proposal is complete or need more information (within 4 weeks).
- (7) A. Masters Degrees – Completed RTE s forwarded to UNC graduate council for a 4-week review period. UNC System reviews comment.  
  
B. Doctoral Degrees – Completed request is forwarded to UNC System Office to selected reviewers. Within 10 weeks, external reviewers sent to campus and Gradate Council will be given access to external reviewers' comments.
- (8) Two Parts:  
  
A. Masters Degree – Within two weeks UNC System Office is prepared to make a recommendation or notifies campus of any remaining issues for campus reply within 4 weeks.  
  
B. Doctoral Degree – Proposal is presented to Graduate Council at next quarterly meeting.
- (9) Completed RTE is posted to Academic Planning website for 4 weeks for systemwide review and comment gathering.

- (10) UNC makes a recommendation to Committee on Educational Planning, Policies, and Programs (EPPP) Committee brought to the next committee meeting.
- (11) If EPPP Committee approves, then degree program is brought to Board of Governors next meeting.
- (12) Board of Governors acts on EPPP Committee recommendation.

**What criteria is used for program approval?**

- (1) Number, location, and mode of delivery of existing programs;
- (2) The relation of the program to the distinctiveness of the campus and the mission of the campus;
- (3) The demand for the program in the locality, region, or State as a whole;
- (4) Whether the program would create unnecessary duplication;
- (5) Employment opportunities for program graduates;
- (6) Faculty quality and number for offering the program;
- (7) The availability of campus resources to support the program;
- (8) The number and quality of lower-level and cognate programs for supporting the new program;
- (9) Impact of program decision on access and affordability;
- (10) The expected quality of the proposed degree program;
- (11) Feasibility of a joint or collaborative program by two or more campuses; and
- (12) Any other consideration relevant to the need for the program.

## Ohio

### **Is the coordinating board for higher education involved in program approval?**

Yes, the Chancellor of the Ohio Department of Higher Education approves academic programs.

The Chancellor has a Chancellor's Council on Graduate Studies (CCGS) for graduate programs only.

### **What is the timeframe for the program approval process?**

For undergraduate degrees a public institution of higher education (IHEs):

- (1) Institution completes an Initial Inquiry and is assigned an institutional mentor. Institutional mentor sends Program Review Plan letter to institution and individuals in oversight of Ohio Department of Higher Education Course and Program Sharing Network summarizing relevant information.
- (2) Program Review Plan is posted on the department's website.
- (3) After internal approval, institution submits Proposal to Chancellor at least 4 months before implementation. Program must meet General Standards for Academic Programs. (Must be submitted within 1 year of receiving a Program Review Plan.)
- (4) There is a 30-day period for peer review of proposal. External consultants required for new educator licensure or endorsement programs.
- (5) There is a Resolution of Concerns between institutional mentor and proposing institution.
- (6) On recommendation for approval to the Chancellor, a background summary of the program is posted on department's website for a 10-day public comment period.
- (7) The request and public comments are forwarded to the Chancellor for approval.

For graduate degree programs at public IHEs, University of Dayton, and Case Western University:

- (1) The steps in graduate program approval require a Program Development Plan (PDP) and a Full Proposal (FP).
- (2) The PDP must be submitted as early as possible in an institutions process. CCGS will review within 4 calendar weeks of submission.
- (3) Based on CCGS reviews and their own assessment, the proposing institution will decide whether the PDP should be expanded to a Full Proposal.

An FP is submitted within 2 years for a PDP. Written comments in the process are due in 4 weeks of submission of a full FP. If an objection is raised, the institution must respond within 10 days in advance of the formal CCGS meeting. A final decision is made “as expeditiously as possible”.

### **What criteria is used for program approval?**

For undergraduate programs:

- (1) Evidence of an agreement between a college and regional business or industry to train students in an in-demand field to employ successful program graduates;
- (2) Workforce need of the regional business or industry is in an in-demand field with long-term sustainability based on data provided by the Governor’s office of workforce transformation;
- (3) Supporting data that identifies the specific workforce needs that the program will address;
- (4) The absence of the bachelor’s degree program that meets the workforce need addressed by the proposed program that is offered by a state university or private college or university; and
- (5) Willingness of the industry partner to offer work-based learning and employment opportunities to students enrolled in the proposed program.

For graduate programs:

The CCGS member institutions shall review the PDP and provide a comments to institutions on the following issues:

- (1) Market need for the proposed program and the distinctions or differences between the proposed program and other similar programs across the state;
- (2) Opportunities for collaboration with the CCGS member’s own institution;
- (3) Concerns with substantive elements of the proposed degree program; and
- (4) Suggestions that might help the submitting institution strengthen the proposal or refine its focus.

The following points are expected to be addressed in the FP:

- (1) Academic Quality (additional standards for entry level graduate degree programs and professional graduate degree programs);

- (2) Need;
- (3) Access and Retention of Underrepresented Groups;
- (4) Statewide Alternatives;
- (5) External Support; and
- (6) Financial Impact.

Evaluation of an FP by CCGS involves the following elements:

- (1) Consideration of written comments provided by each CCGS member;
- (2) Preparation and assessment of the response to these comments by the institution submitting the proposal;
- (3) A formal presentation of the proposal by the initiating institution to CCGS followed by a full discussion of the proposal in the larger context of graduate education; and
- (4) A formal vote by CCGS, by written ballot, advising the Chancellor as to whether the program should be approved.

## Pennsylvania

### Is the coordinating board for higher education involved in program approval?

No, the Board of governors of the State System approves new academic programs for the State system institutions only.

### What is the timeframe for the program approval process?

For new degree program:

- (1) 30 days before submitting New Program Proposal, institution submits Letter of Intent to develop a new program to the Council on Chief Academic Officers;
- (2) Council may approve, return for changes, or reject proposals;
- (3) LOI recommended for approval are submitted to the Office of the Chancellor for addition to the Executive Leadership Group (ELG) consent agenda and, if there are no objections, reviewed by the Office of Academic and Student Affairs. The office will notify institution to proceed with full proposal within 30 days;
- (4) A. An institution submits a Program Proposal using the form provided by the Office. Office obtains peer reviewed feedback from Academic Program Review Committee; and  
  
B. For doctoral programs, documentation of institutional readiness is required for the first two doctoral programs in addition to documentation of programmatic readiness. Institutions must contract with an external reviewer to assess institutional capacity to offer.

### What criteria is used for program approval?

Undeterminable.



## South Carolina

### **Is the coordinating board for higher education involved in program approval?**

Yes, the Commission on Higher Education approves academic programs

### **What is the timeframe for the program approval process?**

Commission guidelines do not give specifics about timelines.

The cycle for the program development/new program approval/program modification process follows the following steps:

- (1) Submission of a new program proposal;
- (2) Review by the Advisory Committee on Academic Programs;
- (3) Submission of a full program proposal;
- (4) Review by the Advisory Committee on Academic Programs;
- (5) Review by the Committee on Academic Affairs and Licensing; and
- (6) Review and approval by the commission.

### **What criteria is used for program approval?**

Compliance with the commission's productivity standards for existing programs will be considered in determining an institution's request to establish a new program.

For new undergraduate programs:

- (1) Objectives of the proposed program;
- (2) Need for the program;
- (3) Program compatibility with the mission, role, and scope of the institution;
- (4) Estimated cost of the program;
- (5) Personnel, facilities, library holdings, and other resources necessary to conduct a program of high quality or a timeline to acquire these resources;

- (6) Research and workforce development needs of the state; and
- (7) Quality and scope of the program.

All proposals to establish a new doctoral program must be accompanied by a review from a qualified out-of-state evaluator approved by the commission, which analyzes:

- (1) The merits of the proposed program;
- (2) Its potential effect on existing programs at the institution;
- (3) Its relationship to similar programs in the state, region, or nation;
- (4) The institution's readiness and ability to support the proposed program; and
- (5) Workforce and market demand in South Carolina since these programs typically have lower enrollment and higher costs than program offered at other degree levels.

New program proposal requests will be approved by the commission only if the proposal contains reasonable assurances that enrollment projections will meet minimum standards for degree productivity.

Institutions shall provide an assessment of the program's implementation (enrollment, costs, recruitment) in the third year of implementation so that the commission may evaluate the accuracy of the program market demand and cost effectiveness.

## Virginia

### Is the coordinating board for higher education involved in program approval?

Yes, the State Council of Higher Education for Virginia approves academic programs.

### What is the timeframe for the program approval process?

A public institution's governing board must approve each proposal for a new academic program prior to its submission to the council.

- (1) Council must first be informed about a new degree program via a Program Announcement before the program can be presented for approval at a later Council meeting. Council action on new degree programs will occur at two specific meetings during the academic year, one in the fall and one in the spring.
- (2) A program announcement will be presented at a specific council meeting. Any questions or concerns or requests for information raised at that time must be addressed in the full program approval.
- (3) Following submission of the full program proposal by a specified deadline, the new degree program will be presented for action at a subsequent specific council meeting.
- (4) Upon publication of a Program Announcement in Council's Agenda Book, institutions already offering similar degree programs may provide feedback on the need for new degree programs and the potential effects of an additional program in Virginia. The chief academic officer of the interested institution should write the council and the proposing institution within 30 days.

May council meeting approval timeline, with deadlines:

- September 1 (deadline): program announcement submitted to State Council of Higher Education for Virginia SCHEV.
- September council meeting: program announcement receives discussion.
- December 15 (deadline): program proposal submitted to SCHEV.
- Program approval considered for action at the May Council meeting; if conferred, approval is effective fall of the same year or within one calendar year after Council approval.

### What criteria is used for program approval?

The council will focus their evaluation on:

- (1) Does Virginia need this program at this time? (Council looks at state needs, employer needs, student needs, and duplication); and
- (2) Why does the institution need this program at this time?  
(Council looks at institutional needs and resource needs.)

## Washington State

**Is the coordinating board for higher education involved in program approval?**

No.

**What is the timeframe for the program approval process?**

n/a.

**What criteria is used for program approval?**

n/a.





October 31, 2023

Lexi Anderson

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## This request was prepared for Michele Lambert, Maryland House of Delegates

### Your Question:

You asked if states are encouraged to collaborate among institutions of higher education or if states punish institutions for not collaborating with others in the state. Specifically, if institutions of higher education are interested in or offer similar programs, does the state encourage or require them to work together?

### Our Response:

After a review of state and board policy, Education Commission of the States compiled the below examples related to new degree programs and institutional collaboration. The examples focus mainly on avoiding duplication of programs offered in the state. Our review did not find an instance where an institution is punished for not collaborating with others when proposing new degree programs.

#### Degree Program Duplication

To ensure there is not an oversaturation of similar degree programs, some states have policies regulating the creation process, including requirements to survey other institution's similar programs and coordinate with neighboring institutions.

**Alabama** Commission on Higher Education (ACHE) provides [guidance](#) on new program proposals and implementation. Within the guidance, the new program proposal should evaluate the need for the program, including if the program duplicates another and why this duplication is justified. Further in the [process](#), the department of postsecondary education sends the proposal application to ACHE for review of need and duplication. Other institutions have the opportunity to comment on the proposal. ACHE will meet to discuss any program duplication and possible areas of collaboration between institutions.

**Arkansas** Department of Higher Education [academic affairs policy](#) outlines the procedure to create a new degree program. It specifically outlines the institution must note if there is any program duplication within the state. However, it does not identify a requirement or encouragement to collaborate with other institutions.

California [A.B. 656](#) authorizes California State University (CSU) to award professional or applied doctoral degrees statewide that do not duplicate University of California (UC) doctoral degrees and satisfy specific requirements. The CSU campus proposing a new doctoral program must submit the proposal to the office of the chancellor of CSU. The CSU campus must submit documentation verifying the proposed doctoral program does not duplicate a UC program being offered or under review. The CSU campus, chancellor and UC Academic Senate must develop and agree on criteria for assessing duplication. All documentation is reviewed by the President of the Association of Independent California Colleges and Universities for final approval or disapproval. The CSU Trustees cannot approve more than 10 new doctoral degree disciplines per academic year.

In **Louisiana**, all new degree programs [require](#) board of regents approval. In addition, non-certificate programs are circulated to chief academic officers statewide for review and comment. For all graduate degrees, [external reviewers](#) are selected by regents staff. The policy does not require or encourage collaboration or coordination between institutions.

**Massachusetts** Department of Higher Education [procedures](#) outline the process to propose a new degree program including a letter of interest, local board approval, and board of education review. The policy does not require collaboration, however the LOI template asks institutions to identify relevant alliances with K-12 education, institutions of higher education, and employers.

**Minnesota** System [Procedure 3.36.1](#) outlines degree program duplication processes specific to 9-16 credit certificate programs. If another college or university offers a similar program within a 45-mile radius, a notice of intent must be distributed through the Program Navigator with a five-day waiting period. For other degree programs, institutions must address any possible unnecessary duplication within their program approval application.

**Mississippi** [reviews new degree program requests](#) at one of five board meetings throughout the year. The requesting institution must submit an electronic copy of the New Academic Degree Program Proposal to the Office of Academic and Student Affairs (OASA) two months prior to the meeting. The request is evaluated by OASA. After OASA review and approval, the proposal is sent to the board of trustees for final approval. One expectation of new degree programs is that they will not be unnecessarily duplicative of other programs within the system.

**Missouri's** [regulation](#) on new program proposals includes a section on duplication of the proposed program. A proposed new program cannot be unnecessarily duplicative of other Missouri institutions' programs. The regulation notes that "unnecessary duplication is a more specific concern in graduate, technical, and professional programs which meet special labor market needs." The unnecessary duplication will be determined by assessing factors including relevance of existing programming, availability of alternative delivery systems, student demand, workforce demand and access considerations. Only the University of Missouri and its campuses can offer Ph.D. or doctorates without Missouri Coordinating Board of Higher Education approval.

**New Jersey's** [new degree program proposal process](#) includes a New Jersey President's Council review to ensure it does not exceed the programmatic mission of the institutions. It follows standards including sufficient academic quality, sufficient evidence of labor market demand, duplication with comparable programs in the state, or required significant additional state resources. If the council's review determines any of these standards have not been met the proposal is referred to the secretary of higher education for review.

**New York** provides [guidance](#) for new programs at different levels; however, policy does not require or encourage collaboration or coordination between institutions.

**Ohio** provides [guidance](#) specifically for new graduate programs in the state. To create a new program an institution must prepare a proposal including a brief faculty vitae, course descriptions, needs surveys or market analysis and consultant reports (if applicable). Within the proposal, an institution must address "statewide alternatives" including opportunities for inter-institutional collaboration. While collaboration is not required, an institution can note where they might collaborate.



**Pennsylvania** [code](#) notes a new program can be approved for a three to six year period while being subject to periodic review. Pennsylvania State System of Higher Education [policy](#) highlights specific requirements for doctoral programs. Along with the general procedure, new doctoral programs must produce documentation of “institutional readiness” for the first two doctoral programs. Specifics are outlined in the policy, however there is no mention of collaborating or coordinating with other institutions or reviewing for duplication.

A 2010 [report](#) from the **South Carolina** Commission on Higher Education outlines the new degree programs creation process, meeting the needs of place-bound practitioners and program duplication vs. unnecessary program duplication. The report specifically makes the case of needed professions in the state and notes that some duplication of advanced degrees is needed for economic vitality across the state. Within the [academic programs policy and procedures](#), the state defines duplication as occurring “when an academic program closely matches another academic program in content, location, or audience.” The commission is required to review all current and proposed programs aiming to reduce duplication, increase effectiveness, and achieve economies.

**Virginia** is updating the program approval policy, so it is currently unavailable. Once updated, it can be found [here](#).

The **Washington** State Council of Presidents houses the [Interinstitutional Committee on Academic Program Planning](#) providing a venue for collegial platform for discussion between institutions when proposing new degree programs. The goal for this program is to increase communication between institutions to meet student and economic needs without unnecessary degree program duplication.