

Proposals for Reduced Credit Degrees - Next Steps

April 2025



MASSACHUSETTS
Department of
Higher Education

BHE discussions to date

- June 11, 2024 BHE Meeting
 - BHE discussed process to consider a sub-120 BA proposal
- *DHE staff interim work- August/ September 2024- DHE Staff engaged with Merrimack, shared application process and invited an application*
- December 3, 2024 BHE Meeting
 - BHE received presentation on BHE regulatory authority and NECHE perspective
- *DHE staff interim work- follow up outreach with Merrimack staff on status of application; meeting between DHE leadership and Merrimack leadership and their consultant on status*
- February 25, 2025 BHE Meeting
 - BHE special meeting with focused panel discussion on reduced credit degrees
- Today's BHE meeting (April 8, 2025)
 - Reflect on BHE feedback received; discuss pathway forward (no vote)

Agenda - Pathway forward

- Identify and provide preliminary feedback on regulatory and policy changes that may allow BHE consideration of pilot proposals
- Chart pathway forward and establish timeline for both reg/policy changes and approval of first cohort- (parallel track)

Regulatory Framework- review

- BHE has regulatory authority, in varying degrees, over all 29 public and 80 independent IHEs operating in the Commonwealth.
- Broadly, the BHE is responsible for ensuring students and families are well informed and their consumer rights are protected.
- IHEs have significant authority and responsibilities* as well, including: :
 - Transparency and accuracy about degree content and in marketing;
 - Holding students accountable to accomplish a defined amount and quality of academic work meeting student learning outcomes; and
 - Preparing students either for transfer opportunities, continued study, or performance in occupations related to the programs of study they complete.

**610 CMR 2.07(3)(c)*

Advancing Innovation within BHE Program Approval Context

Objective in furtherance of BHE Innovation Priority:

Enhance ability of BHE to continuously advance effectiveness in higher education by responsibly enabling opportunities for experimentation responsive to significant changes in society, demographics, technology and public expectations

Degree Granting Authority

Private Higher Education Institutions, M.G.L. c. 69, Sections 30-31C

- Scope: All independent IHEs chartered or amended their charters after 1943
- Statutory authority: BHE must establish and enforce standards regarding mission, leadership and organization, financial structures and sustainability, programs of study, faculty and staff qualifications, physical resources , etc.
- Implementation: Regulation (610 CMR 2) and policy (delegated authority to commissioner, AAC 14-35)
- Data on average (annual):
 - 1 to 2 new IHE applications
 - 20 to 25 new degree granting authorizations

Public Higher Education Institutions, M.G.L. c. 15A, Section 9(a)

- Scope: All public IHEs defined in Section 5 (CCs, SUs, UMass)
- Statutory authority: BHE authorized to “confer upon the boards of trustees the power to offer degree programs after taking into account, among other things, the need, resources and mission of the institution.”
- Implementation: BHE-approved policies and procedures (LOI process)
- Data on average (annual):
 - 12 to 15 new program approvals

Degree Granting Authority

Private Higher Education Institutions, M.G.L. c. 69, Sections 30-31C

Specific language regarding number of credits at the associate's and bachelor's degree levels:

- "An associate's degree shall comprise a minimum of 60 credits, and a baccalaureate degree a minimum of 120 credits." 610 CMR 2.07(3)(c)(2)(a)

Specific language regarding number of General Education credits:

- "Baccalaureate degree: 36 credit hours." 610 CMR 2.07(3)(c)(2)(b)

Public Higher Education Institutions, M.G.L. c. 15A, Section 9(a)

- BHE Program approval policies and procedures, including the degree application templates, are based on requiring a showing 60 minimum credits for an associate's degree, and a minimum of 120 credits for a baccalaureate degree.

Regulatory Amendments

- **Private IHEs:** DHE staff will develop draft regulatory language (610 CMR 2 amendment) that:
 - Will allow BHE to consider, advance and evaluate pilot proposals that may be inconsistent with specific regulatory requirement(s), subject to implementation policies and procedures (**see next slide);
 - Will not permanently codify the pilot(s); and
 - Will specify what happens at the end of the pilot
 - For example, based on evaluation of the authorized pilot(s) after a set # of years, BHE will consider future reg or policy changes to codify and scale the pilot(s), or otherwise phase out the pilot(s) if unsuccessful.
- **Public IHEs:** DHE staff will develop analogous program approval policy language related to pilot proposals from IHEs within the public higher education system.

Implementation policies and procedures for pilot programs

Based on:

- BHE feedback received to date;
- current BHE policy (e.g, [AAC14-352014BHEProgramReviewPolicy.pdf](#));
- NECHE policy on innovation/ sub-120 credit degrees approach; and
- other relevant or analogous regulatory approaches (e.g, [603 CMR 14.16](#) (DESE example))

...DHE staff will develop Implementation Policies and Procedures setting forth the review, approval and evaluation criteria for pilot programs.

Examples of potential content of such Implementation Policies and Procedures:

- IHE must be accredited and in “in good standing” both with BHE regulations and accreditor standards.
- IHE Pilot proposal must be consistent with the existing mission of the institution.
- IHE must demonstrate sufficient resources (fiscal, human, physical) to begin and sustain the initiative.
- IHE must speak to integrity of proposed programs (admissions & degree requirements, curriculum).
- IHE must speak to degree nomenclature and intended student outcomes.
- DHE Policy should include how initiative will be formatively and summatively assessed for success.
- DHE Policy should speak to interplay between, or weight given to, any prior NECHE action on the pilot proposal.

Next Steps

Based on feedback received today:

- For an upcoming BHE meeting (May 2025)-
 - DHE staff to prepare:
 - a draft “pilot regulation” (610 CMR 2 amendment) for BHE review, and
 - an analogous draft “pilot policy” approach for the public IHE program approval process
 - DHE staff will prepare implementation policy framework for considering pilot proposals.
 - Proposals received before May 1, 2025 will help inform the process and may be prioritized for consideration under summer review under the pilot approach, for BHE action in Fall 2025.

Discussion