

Innovation Pilot Proposals: Reduced Credit Degrees and BHE Degree Granting Authority– Update and 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
- April 8, 2025 BHE Meeting
 - Provided BHE with proposal on pathway forward; gathered feedback (no vote)
- Today's BHE meeting (June 17, 2025)
 - Continued discussion and update; proposed timeline for next steps (no vote)

Agenda - Pathway forward

- Update BHE on preliminary regulatory and policy framework under development that may allow BHE consideration of pilot proposals
- Provide opportunity for further discussion on foundational program approval process, and allow for opportunity to ask questions
- Chart pathway forward and establish timeline for informal stakeholder vetting and next steps

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

Regulatory Amendments- Recap from April 2025 meeting

- **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
 - 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.
 - ***CHANGE-** through the drafting process, DHE staff determined that it would be more efficient and equitable to have one set of governing documents- regulations and implementation procedures- apply to both sectors, so that same set of rules for proposing "innovation pilots" apply to both; foundational program approval processes for each remain unchanged.

Regulations and 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 4.16](#) (DESE example))

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

- ✓ *Examples of potential content for inclusion (list from April 8, 2025 BHE meeting):*
 - ✓ 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.

Current framework of draft Regulations**

Current framework of the *draft* regulations:

- speaks to the BHE's degree-granting authority;
- applies to both public and private (independent) IHEs located in the Commonwealth and authorized to grant degrees; and
- allows the BHE to consider, advance, and evaluate individual institutional, program approval proposals that may be or appear to be inconsistent with a standard or regulation of the BHE

**Subject to change based on further internal review and stakeholder vetting

BHE Regulatory Authority

- Institutional authorization/ Program approval (M.G.L. c. 69, s. 30-31C)
 - State law- Any entity chartered (or amends charter) after 1943 and seeks to operate in MA and offer degrees (or courses leading to degree) must be authorized and approved by BHE
 - Federal Law- Post-secondary institutions wanting to receive Title IV funds must be authorized in each state where they operate
- Regulate use of word "college" or "university"
- Conduct IHE Annual Financial Assessments- All private IHEs (new*)
- Administer NC-SARA Reciprocity Agreement
 - MA institutions wishing to engage in distance learning in other states
- State financial aid administration (\$\$\$M+)
 - Authority to set participation requirements
- Campus Safety and Violence Prevention (new*)
- Manage Commonwealth's Consumer Complaint System (Title IV)

Current framework of draft Regulations**

Current draft framework allows the BHE to consider, advance, and evaluate proposals that may be or appear to be inconsistent with a standard or regulation of the BHE:

- **Consider-** provides for an application and review process based on current program approval process for each sector (program approval “plus”)
 - Program approval- DHE staff receive and review application; application must meet all other BHE standards related to program approval; must have visiting committee review, if one not already done
 - “Plus”- In its program approval application, IHE must identify the inconsistent reg/ standard; demonstrate purpose and intent of proposed initiative; the intended positive outcomes; and what measures/ metrics IHE will use to evaluate progress and success.
- **Advance (approve)-** includes minimum IHE eligibility criteria (“good standing”), and BHE review criteria based on two foundational questions:
 - Innovation- Is this an innovation the BHE would like to pursue? Do the risks of waiving or modifying a standard to advance the initiative outweigh the proposed benefits?
 - Quality and Consumer Protection- Does the IHE proposal demonstrate overall ability to provide and sustain an appropriate learning environment for students and otherwise satisfy board’s standards?
- **Evaluate-** (next slide)
- **Subject to change based on further internal review and stakeholder vetting

Current framework of draft Regulations**

- Evaluate- Framework provides that Approval will be conditional and time-limited
 - Conditional approval: will be subject to conditions deemed necessary or appropriate by the BHE (e.g., enrollment; heightened reporting; review of CVs of staff; outside evaluator).
 - Time- limited: _initial approval is up to 5 years; BHE may extend conditional approval based on evaluation of pilot and whether sufficient data has been collected to assess impact and success
- How is the pilot concluded? Based on evaluation of pilot, BHE will either:
 - grant full approval of the pilot by removing the designation;
 - extend conditional approval for another period of time;
 - consider future regulatory or policy changes to codify and scale; or
 - work with IHE to phase out the pilot if unsuccessful.

**Subject to change based on further internal review and stakeholder vetting

Timeline/ Next Steps

- May 16- 28 2025- Preliminary draft regulations prepared and undergo internal vetting (DHE/ EOE/ BHE chair); further edits and refinement
- June 6, 2025- Preliminary draft regulations shared with Stakeholders (SU, CC, UMass segmental representatives; AICUM)
- ➔ ■ **June 17, 2025- BHE Meeting**
- June 18, 2025 – Share Preliminary Draft with BHE Members
- June 18-25- Schedule focused feedback sessions with stakeholders
- June 25, 2025- Date for stakeholders to submit any written comments
- June 26- July 2- Further necessary edits and refinement based on feedback; submit regulatory packet to ANF
- **Late summer/ early fall - Potential BHE meeting** for vote to put regulations out for public comment

Questions on current framework

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Discussion