



**NH Department of Education  
Division of Educator Support and Higher Education  
Higher Education Commission**

**February 14, 2023: Commission Meeting  
Meeting Packet**

**NH Department of Education  
Division of Educator Support and Higher Education  
Higher Education Commission**

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**NH Department of Education  
Division of Educator Support and Higher Education  
Higher Education Commission**

**February 14, 2023: Commission Meeting  
Meeting Agenda**

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**Date & Time:** Tuesday, February 14th, 2023 | 2:00 pm

**Location:** 25 Hall Street | Concord, NH 03301 | Granite State College Building | Event Center

**Virtual Options:**

**Phone Number:** +1 646 518 9805 US (New York) or +1 646 558 8656 US (New York)

**ID & Passcode:** 859 7209 0940 | 096693

**Zoom Link:** <https://us02web.zoom.us/j/85972090940?pwd=aVZUdjNzR2pSblNpNzJ5WlNNQmxDZz09>

- 1) Call to Order (Chair Birx)
  
- 2) Minutes – October 11, 2022 (Attachment) (Chair Birx)  
*Action Requested: Approval as recommended or amended*
  
- 3) New Institution / Program Approval
  - a. The New England Aeronautical Institute / BS in Aviation Degree  
*Action Requested: Approval as recommended or amended*
  
- 4) Administrative Rules Revision Public Hearing @ 2:30pm - Hedc 400
  - a. Draft Revised Rules (Attachment)  
*Action Requested: open/close public hearing*
  
- 5) Director's Report
  - a. Provision for SARA Activity
  
- 6) Adjourn

**Link to Prior Meetings:** [HIGHER ED COMMISSION MTGS, MINS, and AGENDAS](#)

**NH Department of Education  
Division of Educator Support and Higher Education  
Higher Education Commission**

**February 14, 2023: Commission Meeting**  
**October 11, 2022 Meeting Minutes**

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**Frank Edelblut**  
Commissioner

**Christine Brennan**  
Deputy Commissioner

**STATE OF NEW HAMPSHIRE  
DEPARTMENT OF EDUCATION  
Division of Educator Support and Higher Education  
Higher Education Commission  
101 Pleasant Street  
Concord, N.H. 03301  
TEL. (603) 271-2409  
FAX (603) 271-4134**

A meeting of the Higher Education Commission was held on Tuesday October 11, 2022, at 2:00 p.m. at 25 Hall Steet, Concord, NH03301, Granite State College Building, Event Center.

The following members present:

Donald Birx, Chair  
Sr. Paula Marie Buley, Vice Chair  
Frank Edelblut  
Cathy Provencher  
Joseph Favazza  
Mark Rubinstein  
Shawn Fitzgerald  
Susan Stuebner  
Charles Lloyd  
Kevin O'Shea  
Mark Laliberte

The following members were not present:

James Dean  
Michele Perkins  
Melinda Treadwell  
Alfred Williams  
Michael Apfelberg

1. Chair Donald Birx called the meeting to order. A quorum was present.
2. Minutes of the May 10, 2022, Commission Meeting were attached to the agenda and reviewed by members present. Sr. Paula Buley moved, seconded by Joseph Favazza, to approve the meeting minutes. The motion passed without dissent via roll call vote with Mark Rubenstein and Shawn Fitzgerald abstaining.
3. Program Approvals – Richard Gustafson reported on new programs at American University of Madaba and Colby Sawyer College.
  - a. Dr. Kim Bogle Jubinville presented American University of Madaba’s Master of Business Administration in Business Analytics program.
    - A site visit review was done. It went through all appropriate review in Jordan from the Higher Education Ministry and had approval prior to submitting for a review and the site visit with the state.
    - The program was found to be in compliance.
    - The program aligns with the university’s mission and other graduate program.
    - The program is offered to students in Jordan. International institutions previously need approval from a New England state before going through the NECHE process. It is no longer needed, but AUM has a relationship with New Hampshire.

Cathy Provencher moved, seconded by Frank Edelblut, to approve American University of Madaba’s Master of Business Administration in Business Analytics program. The motion was approved without dissent via roll call vote, with Paula Buley abstaining.

- b. Mary Kate Feit presented Colby Sawyer College’s Master of Science and Exercise Science program.
  - The program would be 32 credits, with two tracks: Applied Exercise Science and Strength and Conditioning.
  - The curriculum is aligned with the National Strength and Conditioning Association (NSCA) and the American College of Sports Medicine (ACSM).
  - Fieldwork credit was discussed at the review meeting and Colby Sawyer College staff made changes.
  - The program will have 2 full time faculty members and 5 adjunct faculty members.
  - The program is online. The expected enrollment is a 4 plus 1 model where their students continue after a 4-year degree.
  - The program is tied to the university’s relationship with the Dartmouth Hitchcock Health System. It was developed to fill a need for staff in strength and conditioning positions.
  - The program aligns with other masters’ programs at the university.

Frank Edelblut moved, seconded by Paula Buley, to approve Colby Sawyer’s Master of Science and Exercise program. The motion was approved without dissent via roll call vote, with Susan Stuebner abstaining.

#### 4. Administrative Rules – Hedc 400

Steve Appleby introduced Hedc 400, which are the higher ed administrative rules. The initial proposal was submitted for vote. After voting, it will go to OLS for input. A public hearing will take place in February. A vote will be needed in the spring to approve the final proposal with changes based upon input from OLS and public comment. A final vote to adopt is expected at the May meeting. A memo of substantial changes was provided.

The main changes were discussed.

- International institutions will no longer be approved by Hedc as they can go directly to NECHE. Current institutions will be grandfathered in.
- Wording under review types was cleaned up.

- The rules were aligned with NECHE's standards.

Frank Edelblut moved, seconded by Kevin O'Shea, to approve the initial proposal for Hedc 400. The motion was approved without dissent via roll call vote.

5. Administrative Rules – Hedc 600

Steve Appleby introduced Hedc 600. It was created in response to RSA 188-H, which is the sexual misconduct at institutions of higher education statute that passed. The rules outline survey timelines and deadlines for campus surveys. The official surveys start in 2024.

Mark Rubenstein moved, seconded by Frank Edelblut, to approve the initial proposal for Hedc 600. The motion was approved without dissent via roll call vote.

6. Director Appleby shared highlights from the Director's Report.

- SARA conference was attended in September. DOE is working with SARA to consolidate community college and university renewal dates with the intention of decreasing administrative overhead.
- An ongoing review is being conducted of New England Aeronautical Institute.
- There has been a decline in requests for closed school transcripts. DOE is looking for ways to make the request process more efficient and automated.
- Legislation was passed setting a revenue threshold for career schools for the licensing requirement: \$100,000 per year.
- There is an ongoing discussion with the Veteran's Administration over servicing schools.
- The next 3 meetings will take place at the Granite State College Building Event Center.
- A special meeting will be held in the spring. The commissioner is the only person who must be in person. Other members may call in.
- The statute listing membership for the commission is out of date with the membership of the commission. Steve Appleby will work with NHCUC to update the statute.

7. Michael Apfleberg moved, seconded by Sr. Paula Buley, to adjourn the meeting. The motion passed without dissent.

**NH Department of Education  
Division of Educator Support and Higher Education  
Higher Education Commission**

**February 14, 2023: Commission Meeting**  
**New Institution / Program Approval**  
**The New England Aeronautical Institute / BS in Aviation Degree**

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**Evaluation Report to the Higher Education Commission of the New Hampshire  
Department of Education, Division of Educator Support & Higher Education**

**New England Aeronautical Institute  
Bachelor of Science in Aviation  
Initial Evaluation, September 26, 2022  
Completed Evaluation, January 30, 2023**

**Evaluation Team:**

Dr. Scott A. Stanley, Chair, Dean of Online Learning, University of New Hampshire  
Dr. Thomas Abbott, Aviation Accreditation Board International Member, University of Maine, Augusta  
Mr. Steven Perrotta, Vice President for Finance and Administration, Rivier University  
Dr. Page Tompkins, President and Faculty Member, Upper Valley Educators Institute

**Observers:**

Mr. Stephen Appleby, Director, Division of Educator Support and Higher Education- Higher Education Commission, New Hampshire Department of Education  
Dr. Richard A. Gustafson, President Emeritus, Southern New Hampshire University

**-OVERVIEW-**

New England Aeronautical Institute (NEAI, or the Institute) is a newly created institute conceptualized and developed by a team of four educators who have advanced experience in aviation, higher education administration, licensing, and accreditation, along with familiarity in New Hampshire higher education. The four individuals were administrators who previously worked at Daniel Webster College in Nashua, NH. Dr. Triant Flouris served as the Dean of the School of Aviation Science, Dr. John Slater as the Dean of Arts and Sciences, Mr. Nicholas Bertozzi as the Dean of Engineering, and Mr. Thomas Teller as Chief Academic Officer. The primary project manager for the development of the institute and Managing Director/Chief Executive Officer, Dr. Triant Flouris, earned a bachelor's degree from William Jewell College, a master's degree from Baylor University, and a Ph.D. from the University of South Carolina. After holding various teaching and administrative positions at institutions, some having aviation programs, in the United States, Canada, and Greece, Dr. Flouris now serves as the Vice Principal of Academic Affairs for Metropolitan College, Athens, Greece.

NEAI is designed to be an online school for the 21st Century, with a fully virtual course offerings which strives to provide a forward-thinking education for its students, at reasonable tuition rates, while compensating its employees at very modest rates. The Institute has no physical facilities and no debt. Programs and services are all provided online, with online instruction being asynchronous, enabling student to student/faculty interaction occurring via asynchronous discussions. The first formal NEAI courses are planned for the fall of 2023 using a quarter system of ten-week terms. The Institute does not intend to participate in student loan programs, as the majority of student enrollment is expected to be international and would not be eligible for federal aid. NEAI has obtained initial seed funding of \$85,000 plus \$115,000 in subsidy funding spread out over the first 5 years. The Institute is very much a grass-roots organization at this stage of its development.

The Institute has been established as a 501(c)3 not-for profit corporation in New Hampshire, having been approved by the Secretary of State. This application is for approval of a Bachelor of Science in Aviation.

## **-THE EVALUATION PROCESS-**

In preparation for the evaluation each member of the team received the application document from New England Aeronautical Institute dated June 30, 2022. This was a comprehensive document that addressed the history of the Institute, its response to the Hedc 400 Standards for Program Approval, and several appendices of supporting documentation. Dr. Stanley, the Team Chair, conferred with NEAI Managing Director and Chief Executive Officer, Dr. Flouris, and NH Director of the Division of Educator Support and Higher Education, Mr. Steven Appleby regarding the composition of the evaluation team and the approach for the onsite evaluation the application.

The evaluation team met via Zoom on August 22, 2022, prior to the on-site evaluation to review and discuss the application materials, to review team assignments for the eleven (11) Standards, and to develop the schedule for the on-site meetings with Institute administrators, Trustees, and faculty. Following this meeting NEAI provided additional information regarding the status of their website, Board of Directors Meeting minutes, approved bylaws, and additional clarification of the financial commitment with Global Aviation.

The onsite evaluation was held at the Department of Education building in Concord, NH on August 31, 2022. This was a full-day process of face-to-face discussions with CEO Dr. Flouris and three staff members, and a series of online/phone discussions with eight (8) other faculty, staff, and trustees. These online conversations took place in as many as three different conference rooms at the Department so individual evaluation team members could focus on their assigned Standards. Discussions were wide ranging with several opportunities to talk more than once with some NEAI staff to pursue follow-up questions and to gain access to additional documentation via the NEAI website.

The evaluation team was complementary of CEO Flouris and members of the NEAI community for their professional approach to the evaluation process, and their willingness to be open and candid about the progress made and the challenges remaining as the Institute matures.

A follow-up online meeting including Dr. Flouris, Mr. Papavasiliou, Dr. Stanley, Mr. Appleby, and Dr. Gustafson was held on January 30, 2023 to discuss updated information prepared by NEAI, and to participate in a demonstration of the NEAI website.

## **-STANDARDS-**

### **I. INSTITUTIONAL PURPOSE AND MISSION**

The mission of New England Aeronautical Institute is “cultivation of critical thinking skills and life-long learning attitudes through a technology based individualized and interdisciplinary pedagogical approach with an appreciation of globalization and diversity rooted on the needs of the global aviation industry” to provide online education of exceptional quality for the next generation of aviation professionals.

Core values are identified as:

- Provide for its students individualized, technology advanced, and cutting-edge United States university education applied to aviation.
- Assist its students to engage in professional and personal endeavors that contribute to the community and business development.
- Cultivate an interdisciplinary, global, aviation focused, and stimulating intellectual environment in which career practices in general and more specifically in aviation are informed by the highest standards of ethical behavior and academic theory.
- Instill in students’ attitudes and skills for lifelong learning and leadership roles in the global economy.
- Serve as global center of intellectual excellence in aviation where teaching and practice are intertwined.

There is common purpose in the belief that aviation education should be accessible, interdisciplinary, and infused a spirit of life-long learning. A digital campus model enables the achievement of this purpose.

The Institute’s website clearly presents the mission and expands upon these core values. The Institute and the aviation program have program objectives that align with the mission of the Institute. The vision, mission, and purpose



appropriately define the distinctive character of the proposed institution and provides a focusing direction for the development of the organization and its programs.

The Institute has a generalized institutional development plan, which was outlined in the application. The first, or the developmental phase, of building the program is designing the courses with newly hired faculty. This will be followed by offering the program of study in Fall 2023.

Phase two of the Institute's development is focused on its application for accreditation from the Distance Education Accrediting Commission (DEAC). This will occur after the academic program has earned program approval by the NH Higher Education Commission, and then receiving degree granting authority from the NH Legislature. Growth of student enrollment, stronger finances, and operational stability are goals for the next several years.

The Institute's administrators and trustees were made aware that any new programs must be approved by the NH Higher Education Commission before they may be launched.

## **II. ORGANIZATION AND GOVERNANCE**

New England Aeronautical Institute was incorporated June 28, 2020, in the State of New Hampshire as an organization for educational purposes and has been designated as a 501(c)(3) nonprofit organization by the US Internal Revenue Service. The Institute is governed by a Board of Directors. The bylaws provide for no fewer than seven (7) members and no more than fourteen (14), including the President of the Institute. All members serve three-year terms and are eligible for re-election. All trustees are voting members.

The Board meets at a minimum two (2) times annually, and the meetings are scheduled for June and December. The meeting in July 2022 was the normal business of the Board with a focus on the approval of bylaws and the election of officers. Officers have a one-year term and are eligible for re-election. The fiscal year is July 1 – June 30.

The evaluation team reviewed the bylaws. Board minutes from the July 20, 2022 meeting were reviewed. The Board of Directors adopted the governing by-laws and appointed a managing director (chief executive officer).

The Institute has a core leadership team which consists of the Chairman of the Board, President/Managing Director/Chief Executive Officer, a Treasure/Director of Finance/Chief Financial Officer, and may include a Secretary, a Vice President, and other officers. Reflecting the reality that this is a new institution, each of these management roles are initially part-time, with plans for them to expand as enrollment increases. The experience and competence of the management team, as conveyed by institutional representatives, appears sufficient for the current phase of the organization.

While the role of the Board of Directors and the Management team is clear, the role of faculty and student governance are still works in progress. The institution has developed a Faculty Handbook and a Student Handbook that addresses issues of faculty and student governance, as well as appropriate policies and procedures.

## **III. EDUCATIONAL PROGRAM**

NEAI has laid out an interesting forward-looking institution of higher education in their proposal to offer a Bachelor of Science in Aviation (BSAV) with a focus on flight operations. The program is built on the quarter term system. All courses are planned to be offered online utilizing an integrated and interdisciplinary approach. The clearly articulated goals of the program are to:

- Provide individualized, technologically advanced, and cutting-edge education in the operational and managerial aspects of the global aviation industry.
- Cultivate an interdisciplinary and globally focused pedagogical approach based on systems thinking in understanding and solving aviation problems based on the highest standards of sustainability-based thinking, ethical behavior, and academic theory always considering the safety and security of aviation as their highest priorities.

- Enhance the ability of students to engage in actions that contribute to their communities through their roles as individuals and aviation professionals with understanding of community needs, issues, and priorities.
- Instill in students attitudes and skills for effective communication, lifelong learning and leadership as members of the global aviation economy.

These goals reflect the purpose and mission of the program.

The bachelor's curriculum (120 credits) is broken down into three parts: General Education (10 courses, 40 credits), aviation major (10 courses, 40 credits), and aviation specialization- flight operation (10 courses, 40 credits). Course syllabi are well constructed, and all include student learning outcomes. The courses were constructed by subject matter experts. Individuals with a Commercial or Air Transport Pilot's License will have 40 credits transferred into the program, specifically for the aviation specialization requirement. The course outcomes are linked to program outcomes and institutional level outcomes are linked to those of the Aviation Accreditation Board International (AABI), which is essential for the school to formally complete the continuous improvement process.

The evaluation team acknowledges and values the pre-semester noncredit professional development training/teaching modules as a "persistent" method of building the integrated/interdisciplinary foundation of NEAI.

NEAI's proposal suggests that the curriculum "will encourage students to interact and exchange experiences with their professors and expert business professionals". The "curriculum connections" proposed by NEAI may be the experiences that help students increase engagement and succeed. The institution has developed an initial outcomes assessment framework.

The program outcomes were clearly articulated. The outcomes are:

- Analyze and understand current issues in aviation.
- Implement effective management strategies in addressing issues in aviation within and outside of their organization.
- Act in various ways with a civic engagement mindset to support community endeavors.
- Stay informed about, appreciate new developments, communicate effectively and lead change in their professional fields.

A program assessment plan has also been developed.

#### **IV. GRADUATION REQUIREMENTS**

Students need to enroll and pass, with a grade of C or better, a total of 120 credits to graduate. The number of courses will vary depending upon the type and amount of transfer credits awarded for prior achievement. The program appears both intuitive for incoming students, and flexible enough to accommodate varying amounts of transfer credit. Academic advising and mentoring is to be provided. Graduation requirements are appropriate for this focused Aviation Program. The graduation requirements, as well as criteria for continuous good academic standing, are clearly articulated.

#### **V. FACULTY**

The NEAI faculty are academically qualified with the appropriate terminal degree and where necessary possess the appropriate aviation experience. Based on the review of provided credentials and discussions with six proposed faculty, it appears their cumulative strengths, experiences, and approach to teaching are very well suited for this "integrated/interdisciplinary" aviation program.

Faculty are to be compensated on a per-student, per-class basis, and are considered part time, adjunct faculty. The Institute has no full-time faculty but plans to hire full-time faculty when appropriate enrollment growth has been achieved.

The evaluation team suggested the development of a faculty handbook to define the policies and practice within the institution, which the institution has completed.

## **VI. STUDENT BODY**

The aspiration of the Institute is to attract and recruit aviation industry professionals, and aspiring professionals, especially licensed pilots, who do not possess academic credentials at the baccalaureate level. As an online institution, NEAI is aware of the NC-SARA organization and will not enroll US online students from states that require SARA participation and approvals. The long-range plan is to be a SARA institution once accredited by the Distance Education Accreditation Commission.

Due to the online nature of instructional delivery, a student can combine their educational pursuit with their professional aviation training.

A clear and concise description is provided of the admissions criteria and necessary supporting documentation. Students admitted to the bachelor's degree program are required to have completed a minimum of a high school diploma from an accredited high school or equivalent. In addition to official high school transcript/diploma, the application process includes evidence of English Language proficiency, assessment of a writing sample, two letters of recommendation, a digital headshot photography, copy of applicant's passport/official identity card, an interview, and a non-refundable application fee.

Standards for continued enrollment were outlined in the institutional plan and a Student Handbook has been developed, as well as an institute catalogue. Students have seven years to complete the program of study.

Details pertaining to transfer credit were articulated, along with criteria for continuous enrollment. There is mention of academic support, career support, and psychological counseling services being offered by an outside agency. There are now provisions for these services.

The projected initial student cohort for the first fiscal year was 14 students and increasing each year thereafter. Although the intention is to start enrolling students in New Hampshire with previous aviation credentials, it is possible for students with no aviation training to enroll in the program.

The need was identified for the Institute to provide students with a handbook, accessible via the website, to include policies such as appropriate counseling in program planning, course selection, registration procedures, deadlines for course additions or withdrawals, and basic course requirements. This has now been completed.

## **VII. STUDENT RECORDS**

The New England Aeronautical Institute is a virtual institution with all processes online, inclusive of student records. All student information is intended to be treated strictly in accordance with the terms of the 2472/97 Data Protection Act. The plan is to utilize a series of independent software systems, yet to be determined, to generate and maintain students' academic and financial records. Student records will be cloud based. Written policies regarding access and duplication of student records were not provided. There is a reliance on the third-party systems for this functionality. There was no written policy available to support the handling of student documents, whether in physical or electronic form. It is important to note that the administration has made the conscious decision not to offer financial aid to students, thereby negating the need for supporting student financial aid documents.

Through the interviews, it was determined there was not yet a process in place for faculty advisors to address nonacademic issues the students might be experiencing, which may influence academic performance. The institution plans to provide links to health services and psychological counseling services, as do most online institutions. A question remains as to how the Institute might address items such as ADA or Title IX issues. The evaluation team suggested the development of a plan to survey graduates on a routine basis to obtain graduates' feedback on student support services.

## **VIII. LIBRARY AND INFORMATION RESOURCES**

Aviation and general education databases and other online resources have been acquired to support the academic offerings. The resources incorporate open-source and licensed materials to minimize student costs. Due to the online nature of the institution, there will be no physical library infrastructure. The information resources will be managed by the Chief Academic Officer and the Director of Finance and Administration. Evidence was not provided which described a strategy for how the information and library resources are applied and supported for faculty and students, specifically linked to student success and retention.

## **IX. FACILITIES AND TECHNOLOGY**

NEAI plans to start using a personal residence as the Institute's business address. As the College adds staff to support growth, they plan to relocate to leased space within PlaneSense, located on the former Pease Airforce Base in Portsmouth, NH. The Institute will serve students as an entirely online campus. NEAI will use its website and the Microsoft 365 suite of products to deliver instruction, communicate within the academic community, and provide administrative and academic services to its students.

Operating as a virtual campus, the website is clearly one of the most important features of the College. NEAI secured the website [www.neai.aero](http://www.neai.aero), which currently contains basic information about the institution, academics, and admissions. Following the initial evaluation sessions in September 2022, the institution "built-out" its basic website to provide information and resources which allow individuals to move from inquiry to actively enrolled including such as an application form, academic calendar, registration, bill payment, advising, public disclosures, student portal, etc. The functionality of the site was demonstrated to the Chair of the Evaluation Team, The Director, staff, and consultant to the Higher Education Commission in January 2023.

NEAI will use the Microsoft 365 integrated suite of software components and tools to support its administrative and instructional environments, all of which will be cloud based.

The Institute will also utilize Microsoft Office365 for record keeping, and cloud storage.

NEAI will receive IT support through services provided by Global Aviation and a UK based IT specialist, Mr. Aimilios Papavasiliou, who will function as the Chief Information Officer (CIO). The Director of Operations, Dr. John Slater, will provide oversight for the technology environment as part of his responsibilities.

In summary, NEAI is keeping overhead costs low with respect to facilities and technology. Utilizing this approach fits their goal for low-cost tuition. If done well, they can use low-cost solutions that integrate with each other.

## **X. FINANCIAL RESOURCES**

NEAI received an \$85,000 startup subsidy from Global Aviation S.A . Global Aviation will extend an operational subsidy of an additional \$115,000 to cover the projected operating losses through FY 2027. Upon break-even, NEAI will begin repaying the loan, unless Global Aviation converts it to a gift requiring no repayment. These arrangements have been defined in a legal document.

The initial operating period will be from January 1, 2023 to June 30, 2024. Budgeted revenue for this period is projected at \$103,680. Tuition represents 100% of revenue with a projected 14 enrolled students taking credits at the tuition rate of \$180 per credit. FY24 expenses of \$159,019 are allocated primarily to employee compensation (46%), cost sharing with Global Aviation (16%), and marketing (14%). Operations are projected to finish with a \$55,339 loss for FY24.

Revenue is projected to increase in subsequent years based on enrollment growth. Expenses are projected to grow at a slower pace. Personnel, administrative overhead provided by Global, and tuition remain the primary expense drivers. Operations are expected to generate a loss through FY27 with a \$44,000 projected surplus beginning in FY28. The revenue share to Global Aviation represents costs for back office administrative functions provided by Global Aviation. As NEAI becomes profitable, the College will consider hiring full-time staff to perform these functions at which time the administrative fees paid to Global Aviation will end.

NEAI projections of enrollments are conservative based on the expected industry forecasts for shortages in qualified aviation personnel along with the enrollment trends of Global Aviation. NEAI needs to consider that working adults typically attend part-time and therefore, the College will need to enroll a higher number of students to achieve the credit projections. Further, NEAI will rely on marketing of their program through the services of Global Aviation. The budget contains funding for marketing and the principals will be recruiting through existing relationships with airlines and attendance at airline industry shows. It is not clear how much staff time will be devoted to recruitment.

The five-year proforma is a solid starting plan but will need to be further refined and revised as actual revenue and expense figures are finalized for each budget period.

NEAI has appropriately taken a surety bond equal to the full amount of tuition, and cyber security liability coverage of \$1M. There does not appear to be other insurance budgeted such as general liability, educators' legal liability, and fiduciary liability.

Mr. Alexander Tsaktanis will serve in the role of Director of Finance and Administration. He will assume this position in a part-time non-salaried capacity. NEAI prudently engaged a U.S. accountant. Transactions will be processed by Global Aviation and sent to the accountant to manage bookkeeping and required financial reporting. NEAI acknowledges a full-time Director of Finance and Administration will be needed as soon as the budget can support it. Mr. Tsaktanis serving as the CFO of NEAI and Managing Director of Global Aviation creates both opportunities and risks, thus the need to document the line of credit and services provided by Global Aviation. It is good NEAI engaged a local accountant, but there may be a risk with operating under the processes of Global Aviation will result in control gaps or instances of non-compliance that are not identified until after the fact.

#### **XI. PUBLIC DISCLOSURE**

The institution has a publicly available website (<https://neai.aero/>) which includes a general description of the institute, the institute's vision and mission statements, a list of the Board of Directors, a brief overview of the academic program, a list of faculty members' names, information about student appeals of grades and where to lodge complaints, and a non-discrimination statement.

Regarding admissions, the website includes minimum required qualifications, items applicants are expected to submit, and means of demonstrating English language proficiency.

The website also includes tuition information including the cost per credit, fees, and the estimated cost to degree; consistent with the tuition and fees included in this narrative report: "NEAI tuition is reasonable at 180 \$ per credit. A student completing all 120-credit required for graduation will spend 21,000 \$ for their undergraduate education. In addition, students are subject to a 50 \$ application fee and a 50 \$ graduation fee."

Following the initial evaluation team review in September 2022, the NEAI website was refreshed as to look and feel, and was populated with more comprehensive information about the institution, its Trustees, administrative leadership, and faculty. The institutional catalog, faculty handbook, student handbook, and documents on program assessment and library usage were added. The site and its learning environment has been completed using the Microsoft 365 software platform with associated Microsoft products such as Outlook for email and Teams for online conferencing.

A demonstration of the website content and functionality was given for the chair of the evaluation team, the director of the Higher Education Commission, commission staff and an independent consultant in January 2023.

The Institute cannot be expected to publicly disclose (g) rates of student success, including rates of retention, graduation, and other measures of success appropriate to its institutional mission until they have students enrolled in and completing the program.

The Institute is still in the prospective and development stage. Their representatives have indicated that they are aware of these requirements and plans are in place to develop and disclose the needed policies and procedures. Prior to accepting applications, the institution will need to move these policies and procedures from the "in development" phase to the publicly available and published stage.

## **-SUMMARY AND INTERIM REPORT DEVELOPMENTAL RECOMMENDATIONS-**

The New England Aeronautical Institute (NEAI) presented the evaluation team with a comprehensive proposal, along with ancillary materials, which addressed the Hedc 400 Higher Education Administrative Rules and its 11 Standards for Evaluation. The mission and purpose of NEAI is focused and clear, administrative personnel and Board of Trustees are in place with Bylaws, and it is incorporated as a 501(c)3 not-for-profit corporation in the State of New Hampshire. Banking, legal and CPA accounting relationships have been established. The academic program, a 120 credit-hour Bachelor of Science in Aviation, is well constructed and attention was given to the Standards of the Aviation Accreditation Board International (AABI). Course descriptions and syllabi were provided, and the review of faculty credentials and discussions with faculty ascertained qualifications and experience. Admission and graduation requirements are defined, and plans for the provisions for student records and instructional resources were described. The evaluation team noted the presentation of financial resources, budget projections, program assessment plan, administrative policies and procedures, student records, the online instructional delivery system, and public disclosures required additional development.

Following the onsite review, the evaluation team prepared the following list of additional areas for continued development prior to its consideration of bringing a recommendation for approval to the Commission.

### **In the area of budget and finance:**

- A revised budget proforma to reflect the proper fiscal years. It appears that the initial fiscal year, year one, will be 18 – 20 months beginning in late 2022 and ending on June 30, 2024. Confirmed, with updated budget proforma through FY 2028.
- The revised budget should identify the start-up costs in a way that differentiates these costs for the normal operational costs of year one. These start-up costs may be shown in a separate budget or included and identified within the total budget plan for year one. (Completed)
- The Commission needs to see a formal document that spells out the total amount of the start-up and operational subsidies to be provided by Global Aviation, and the terms for the re-payment and/or forgiveness of this financial support. (Completed)
- The Commission needs to see a formal document/management agreement that spells out the shared personnel and operational services that will be provided by Global Aviation. (Completed)
- The Commission needs to see any lease or rental agreement with Plane Sense for the NH physical location of NEAI. (Completed)
- Evidence of readiness to obtain a surety bond to ensure the ability to provide student tuition refunds in the event of disruption or cessation of operations. (Completed)
- Evidence of any other insurance coverages to protect institutional personnel or assets. (Completed with cyber security insurance)

### **In the area of Institutional policies and procedures:**

- Development of a working institutional catalogue. As discussed, as an online institution, you may decide to forego the traditional institutional catalogue and place all that information on the website, properly indexed for student and public access as appropriate. (Completed and on the website)
- A student handbook paying attention to the student information requirements in Standards 4, 6, & 7. All elements of this would be on the website as well and/or available through the student portal. (Completed and on the website)
- A faculty handbook paying attention to the requirements in Standard 5. The faculty handbook may or may not be a document that is on the public website as it contains many personnel policies and procedures. It is often an electronic document that is available via an employee portal, which would also contain other items of interest and importance to employees. (Completed and on the website)
- An employee handbook, which mirrors the faculty handbook, but has policies and procedures pertinent to professional and hourly staff. (In process and will follow labor laws of the State of New Hampshire)

### **In the area of institutional website development:**

- Significant continued progress on the buildout of the NEAI website. The evaluation team recognizes that considerable work has been done in the design of the website, but more evidence of implementation and functionality is expected. This would include such elements as:
  - A home page and navigation bar that directs the user to the major informational dimensions of the Institute. ABOUT, ACADEMICS, STUDENTS, ADMISSION, CONTACT, and the like.
  - Institutional information regarding vision, mission, and purposes. This would include a profile of the anticipated students.
  - Biographical information about the administrators, trustees, and faculty of the institution.
  - Academic program information on the structure, content, course descriptions, outcomes, and assessment plans, as well as admission, grading practices, academic standing, and graduation requirements.
  - Transfer policies and procedures, including required documentation for review.
  - The ability for students to submit their application for admission online.
  - A major section on the instructional delivery system and the technology for student access to the instructional LMS. This would likely be set-up for access via a student portal, that enable the student to register for course work, pay their account balances, access the library/instructional resources, access student advising, obtaining their grades and viewing their transcript.
  - A statement of where the website is “hosted” and the provisions for redundancy and security for technology and site content.
- We are not sure of your final decision as to the best LMS for NEAI, but comprehensiveness and robustness is best installed now to avoid future modifications that tend to disrupt operations. A strong LMS will also have tools to assist in student identity, online examinations, and monitoring academic integrity.

Significant work was conducted to recast the website and in using Microsoft 365 software for the site and to support the online instructional environment. This was effectively demonstrated to the chair of the evaluation team, the Director of the Higher Education Commission, and others.

Demonstration of website completeness and functionality:

- The evaluation team wishes to see a demonstration of the status of the website development and its instructional delivery functionality. NEAI is encouraged to pilot test the site’s public information aspects, as well as its instructional delivery functionality. (Completed)

### **In the area of academic program:**

- Evidence of a systematic comprehensive programmatic assessment plan. (Completed)

In January 2023, NEAI submitted a supplemental report, with supporting documentation, and provided access to its now fully developed website. The report and documents were reviewed and discussed with Dr. Triant Flouris, who also provided a demonstration of the website. NEAI has provided the level of detail and depth of developmental work in meeting the expectations of the evaluation process.

Some of the language in the original draft of the evaluation report has been modified to reflect the continued development of policies, procedures, documents, and most importantly, the build-out of the NEAI website.

### **-RECOMMENDATION-**

It is recommended that the Higher Education Commission grant approval to the New England Aeronautical Institute (NEAI) to offer the Bachelor of Science in Aviation degree through June 30, 2026.

1. This approval is with the requirement that a Progress Report be filed by August 31, 2023, that includes:
  - A demonstration to Commission representatives of the continued enhancements and functionality of the

website and its related instructional and student administrative services components.

- Evidence of results of the pilot testing of two courses of the online instructional system with students and faculty planned for late spring and summer 2023.
  - Apprise the Commission of the status and progress of NEAI initiatives to receive degree granting authority from the New Hampshire General Court.
2. This approval is with the requirement that annual reports addressing the following matters be filed beginning on December 31, 2023:
- Status of achieving degree granting authority from the New Hampshire General Court.
  - Correspondence and reports to AABI.
  - Correspondence and reports to DEAC.
  - Enrollment and retention figures for each term of the program.
  - Graduation figures in future years, and placement success.
  - Assessment planning progress.
  - Resumes and teaching assignments for faculty new to the program.
  - Note any changes to the curriculum.
  - Records of financial performance against pro-forma projections.

The Commission will conduct an Administrative Approval evaluation of NEAI in the Spring of 2026 to determine continued approval beyond June 30, 2026.

This approval is with the condition that copies of all correspondence and materials (including annual reports) to/from any accreditation association be forwarded to the Commission. Additionally, the Commission would be invited to attend and observe any accreditation site visit(s).



**NH Department of Education  
Division of Educator Support and Higher Education  
Higher Education Commission**

**February 14, 2023: Commission Meeting  
Administrative Rules Revision: Hedic 400 Draft Revised Rules**

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**Readopt with amendment Hedic 400, effective 10-5-13 (Document #10429), to read as follows:**

CHAPTER Hedic 400 DEGREE-GRANTING HIGHER EDUCATION INSTITUTIONS WITH A  
PHYSICAL PRESENCE IN NEW HAMPSHIRE

PART Hedic 401 APPLICABILITY

Hedic 401.01 Institutions Excluded from Commission Jurisdiction. The following institutions shall not be subject to the jurisdiction of the higher education commission:

- (a) Institutions of the university system of New Hampshire pursuant to RSA 187-A, and the community college system of New Hampshire pursuant to RSA 188-F;
- (b) An in-state institution which has been in continuous operation since before 1775; and
- (c) Out-of-state institutions with no physical presence in New Hampshire that:
  - (1) Are members of The National Council for State Authorization Reciprocity Agreements (NC-SARA) offering~~Offer~~ credit-bearing courses, programs and/or degrees exclusively by online computer delivery, even if the institution has online instructors residing in this state if those instructors do not physically meet with students;
  - (2) Send recruiters to college fairs or advertise in this state;
  - (3) Partner with an approved New Hampshire institution that provides credit to New Hampshire college and university students; or
  - (4) Contract with a New Hampshire entity that develops curriculum or instructional materials.

Hedic 401.02 Institutions Under Commission Jurisdiction. The following institutions shall be subject to the jurisdiction of the higher education commission:

- (a) Institutions that have a physical presence in New Hampshire and seeking to offer or currently offering credit bearing courses, programs or associate, bachelor, master, and/or doctoral degrees in New Hampshire;
- (b) Institutions planning to establish or having an administrative office in New Hampshire;

(c) Out-of-state institutions who are not members of NC-SARA seeking to offer open or closed credit-bearing internships, practicums, courses, programs or degrees that have the physical presence ~~of an instructor~~ in New Hampshire; ~~and~~

(d) Previously approved international institutions, at their sole discretion; and

(~~e~~) Teacher certification program(s) offered by approved New Hampshire institutions shall fall under the provisions of RSA 186:11 and Ed 600.

## PART Hedc 402 DEFINITIONS

Hedc 402.01 Terms Used. As used in these rules, the following terms have the meanings indicated:

(a) "Commission" means the higher education commission under the division of higher education, department of education;:-

(b) "Director" means the director of the division of educator support and higher education at the New Hampshire department of education, or designee;

(~~c~~) "Physical presence" means an actual physical location for instructional purposes, maintaining an administrative office including a mailing address or phone number, or face-to-face advising, mentoring, supervision, testing, or instruction taking place in New Hampshire; and

(d) "NC – SARA" means the National Council for State Authorization Reciprocity Agreements, which governs reciprocity agreements between member states, territories and districts of the United States of America. These agreements permit member institutions in member states, territories and districts of the United States of America to offer online educational programs without requiring separate approvals.

## PART Hedc 403 COMMISSION OPERATIONS

Hedc 403.01 Officers.

(a) The commission shall have a chair and a vice-chair, each elected for a two-year term, with one being a representative of a public institution and one being a representative of a non-public institution.

(b) The chair shall preside over the meetings of the commission.

(c) The vice-chair shall assume the responsibilities of the chair in the chair's absence.

(d) If both the chair and the vice-chair are absent, the director shall serve as the chair pro-tem.

(e) The vice-chair shall assume the position of chair upon the conclusion of the chair's term, or upon vacancy of the position by the chair.

Hedc 403.02 Commission. Meetings of the commission shall be conducted as follows:

(a) The commission shall meet at least 3 times per year;

(b) Emergency meetings shall be called by the chair in accordance with RSA 91-A:2, II and III(b);

(c) A majority of the current membership of the commission shall constitute a quorum; and

(d) Meetings of the commission shall follow the provisions of RSA 91-A and shall follow Robert's rules of order, as referenced in appendix II.

#### Hedc 403.03 Committees.

(a) The following shall apply to the executive committee established by the commission:

(1) The executive committee of the commission shall consist of the chair, vice-chair and three other members of the commission appointed by the chair as follows:

- a. One member representing a public institution;
- b. One member representing a private institution; and
- c. One member representing the lay public representative;

(2) Members shall serve for a term of two years;

(3) The executive committee shall act for the commission in advising the director and taking action for the commission; and

(4) The commission shall consider any action taken by the executive committee at its next regular meeting.

(b) The following shall apply to the nominating committee established by the commission:

(1) The nominating committee of the commission shall consist of commission members appointed by the chair as follows:

- a. One member representing a public institution;
- b. One member representing a non-public institution; and
- c. One member representing the lay public;

(2) Members shall serve for a term of two years; and

(3) The committee shall present its nominations to the commission for chair and vice-chair upon the completion of their terms of office, or upon a vacancy.

#### PART Hedc 404~~3~~ INCORPORATION

##### Hedc 404~~3~~.01 Institutions Seeking Incorporation in New Hampshire.

(a) Pursuant to RSA 292:8-c through 8-h, the commission shall advise the legislature concerning the granting of degrees. Any institution that intends to seek incorporation as a degree-granting institution in New Hampshire shall secure approval from the commission prior to seeking authority from the legislature and shall

submit articles of agreement as required by RSA 292:8-c and 8-d and shall be subject to the provisions of Hede 4065.

~~Hede 403.02 Institutions Seeking Incorporation in New Hampshire with a Main Campus Outside the United States.~~

~~(ba) Pursuant to RSA 292:8-c through 8-h, the commission shall not consider institutions with a main campus outside of the United States for approval advise the legislature concerning the granting of degrees.~~

~~(b) Any institution that intends to seek incorporation as a degree-granting institution with a main campus outside the United States shall secure approval from the commission prior to seeking authority from the legislature and shall submit articles of agreement as required by RSA 292:8-c and 8-d and shall be subject to the provisions of Hede 405.~~

~~(c) In addition, it shall submit the following information:~~

~~(1) Information regarding legal status of the institution in the country/countries in which it currently operates or intends to operate, and recognition by the country/countries in which it intends to operate by the ministry of education and accreditor(s) as applicable;~~

~~(2) Evidence of a staffed administrative office in New Hampshire;~~

~~(3) Evidence of representation by legal counsel who is a member of the Bar in New Hampshire or another state;~~

~~(4) Annual financial audits by a certified public accountant in the U.S. or by a U.S. affiliate firm in the country or countries where the institution operates or plans to operate;~~

~~(5) Accreditation status/intentions with a regional or national agency recognized by the U.S. department of education, the council for higher education accreditation, or both;~~

~~(6) Evidence that the institution's leadership has significant experience with American higher education; and~~

~~(7) Evidence that the governing board includes members from the New Hampshire community.~~

PART Hede 4054 EVALUATION PROCESS

Hede 4054.01 Initiating the Evaluation Process.

(a) Any institution seeking commission approval(s) shall discuss the proposed plan with the director or designated representative.

(b) The institution shall identify the:

(1) Name of the institution;

- (2) Approval(s) sought;
- (3) Reasons therefore;
- (4) Proposed timeline; and
- (5) Anticipated benefits to students and to New Hampshire.

Hedc 4054.02 Determination of Review Type.

- (a) The director shall determine the type of review required based upon the program request, incorporated status, accreditation status, institutional sustainability, and previous approvals granted to the institution.
- (b) Types of reviews shall be as follows:
  - (1) A comprehensive review; and
  - (2) ~~An expedited review; and~~
  - (~~2~~3) An administrative review.
- (c) A comprehensive review shall require the institution's written plan to respond to each standard in Hedc 4065 and the review shall be conducted by an evaluation team.;
- (d) An ~~administrative~~expedited review requires the institution's written plan to respond to each standard in Hedc 4065 as appropriate.;
- (~~e~~1) The ~~administrative~~expedited review shall be conducted by the director or by an evaluation team.;
- (~~f~~2) The ~~administrative~~expedited review shall be used for the following:
  - (1) ~~a-~~ In-state institutions seeking degree-granting approval for a new degree, ~~or a~~ new degree level, a new program within an existing approved degree level, or a review of an already approved program not covered by earlier approvals; ~~and~~
  - ~~b. Out of state institutions seeking approval to offer open credit bearing courses, programs/degrees or a branch campus.~~
  - (~~e~~) ~~An administrative review shall be conducted by the director and/or an evaluator for an institution that is accredited by a regional or national agency recognized by the U.S. department of education, the council for higher education accreditation, or both.~~
  - (2) Out-of-state institutions seeking approval to open a branch campus;(~~f~~) ~~The administrative review shall be used for the following:~~

~~(3)(1) In-state Out-of-state institutions seeking approval to offer open credit-bearing courses, programs, degrees, internships, or practicums for a new program within an existing approved degree \_\_\_\_\_ or degree level, or a review of an already approved program;~~

~~(42) Out-of-state institutions seeking approval to offer closed credit-bearing courses, programs, degrees, internships, or practicums, and that require a memorandum of understanding, have the physical presence of an instructor for which the public is not admitted, or both; open internships or practicums that require a memorandum of understanding and/or have a physical presence of an instructor; and~~

~~(53) In-state or Out-of-state institutions voluntarily seeking approval to offer innovative or pilot programs, specialized certificates, assessments, or programs closed credit-bearing internships, practicums, courses or degrees for which the general public is not admitted and the institution does not publicly advertise.~~

#### Hedc 40~~5~~4.03 Comprehensive Review.

(a) An evaluation team shall conduct a comprehensive review that requires the institution's written plan responding to each standard in Hedc 40~~6~~5.

(b) The evaluation team shall link its work with specialized licensing or professional accrediting agencies when such is pertinent to professional practice of development, or when licensure is required in New Hampshire for professional practice pursuant to RSA 292:8-e.

(c) Upon completion of the evaluation, the evaluation team shall submit an evaluation report that:

(1) Considers in detail, the institution's compliance with Hedc 40~~6~~5; and

(2) Makes a recommendation as to whether the commission should grant or continue approval.

(d) The institution shall have an opportunity to respond to the evaluation report and to respond to any specific questions within 10 days.

#### Hedc 40~~5~~4.04 Expedited or Administrative Review.

(a) Any institution undergoing an ~~expedited or~~ administrative review shall submit a written plan addressing the points below and Hedc 40~~6~~5 as appropriate:

(1) The name of the institution;

(2) Approval being sought;

(3) Previous degree-granting authority awarded by the legislature and approved by the commission;

- (4) Rationale for development of the proposed program within the stated institutional mission;
- (5) Program planning and development process utilized in developing the request;
- (6) Proposed course, program or degree offering, syllabi, relevant biographies and credentials of faculty expected to teach in the proposed program;
- (7) A demographic description of students to be served;
- (8) New resources that will be required to fully implement the curriculum;
- (9) Changes and shifts in organization and governance required to adjust to the proposed program;
- (10) The location to be used and the anticipated timeframe/duration of the offering(s);
- (11) ~~Anticipated benefits to students, and New Hampshire;~~

(11~~2~~) Documentation that the institution is in good standing with a regional or national accrediting agency recognized by the U.S. department of education, the council for higher education accreditation, or both;

~~(13) Copies of most recent accreditation report(s), including any progress on substantive recommendations and/or concerns found;~~

(12~~4~~) Certificate of registration filed with the New Hampshire secretary of state; and

(13~~5~~) Copies of a signed contract or memorandum of understanding with New Hampshire educational or business entity, if applicable.

(b) Any institution undergoing an administrative review for an already approved program shall submit a written plan which:

- (1) Updates any information or changes for each of the standards in Hede 406~~5~~; and
- (2) Responds to the concerns, suggestions and recommendations in the commission's most recent approval of the program(s).

Hede 405~~4~~.05 ~~Administrative Review~~Evaluation Materials. An institution shall submit ~~6 copies, plus~~ an electronic version, of a written plan that addresses the standards in Hede 406~~5~~ ~~at least 6 months in advance of the anticipated implementation date.~~

~~Hede 404.06 Notification. The director shall notify the chairpersons of both the House and Senate education committees so that each may appoint a member to participate on those evaluations conducted by an evaluation team.~~

Hedc 40~~54.067~~ Decision by the Commission.

- (a) Upon receipt of the evaluation report, the commission shall review the report and vote to accept, amend or reject the recommendations contained therein based upon its determination of compliance with Hedc 40~~65~~.
- (b) The institution shall be invited to attend the meeting of the commission to answer any questions from the commission.
- (c) The director shall notify the institution of the commission's decision in writing within 10 days of the commission vote.
- (d) Unless otherwise authorized, the institution shall not advertise or commence instruction until commission approval is granted.
- (e) If the decision of the commission is to reject an institution's application for degree-granting authority, based on non-compliance with Hedc 40~~65~~, the details of that decision shall be included in the letter of notification.
- (f) The institution may appeal the commission's decision.

PART Hedc 40~~65~~ STANDARDS FOR ~~AN~~ EVALUATION

Hedc 40~~65~~.01 Institutional Purpose and Mission and Purposes.:

- (a) In its written plan, the applicant shall set forth: ~~a(1) A well-defined statement of the institution's purpose and mission and purposes.;~~ ~~(2) Specific learning objectives for its students both generally and in each program of study; and~~
  - ~~(3) A narrative statement describing how the institution achieves or will achieve the purpose and mission set forth in the statement of purpose.~~
- (b) The applicant shall submit the following documents:
  - (1) A copy of the vote of the board of the institution's resolution adopting the statement of mission and purposes as submitted;
  - (2) A certified copy of the bylaws or other governing instrument specifying the procedures for amendment of the statement of purpose; and
  - (3) A certificate of registration filed with the New Hampshire secretary of state.

Hedc 406.02 Planning and Evaluation.

- (a) The applicant shall describe its planning process and provide evidence of the following:



- (1) The institution's plan beyond a short-term horizon, including strategic planning that involves realistic analyses of internal and external opportunities and constraints;
- (2) The results of strategic planning that are implemented through financial, academic, enrollment and other supporting plans;
- (3) Institutional allocation of resources that are consistent with planning priorities;
- (4) How the institution plans for and responds to financial, enrollment and other contingencies; and
- (5) The institution's record of success in implementing the results of its planning.

(b) The applicant shall provide evidence that it regularly and systematically evaluates the achievement of its mission and purposes as follows:

- (1) The institution's policy and procedures for evaluating the quality and effectiveness of its academic programs;
- (2) The institution's evidence of student learning outcomes; and
- (3) The institution's demonstration of record of success in using the results of its evaluation activities to inform planning, changes in programs and services, and resource allocation.

Hedc 4065.032 Organization and Governance.

(a) The applicant shall describe its organization and governance structures in its written plan, including:

- (1) Organizational charts, ~~administrative responsibilities~~ showing the lines of authority and the relationships among component units and personnel; and
- (2) Evidence of a governing board ~~of 7 that reflects diversity and complies with its bylaws or more people of which fewer than one-half have any financial interest in the institution as an employee, stock holder or corporate director.~~

(b) The governing board who will be responsible for the general policies and control of the institution and which shall:

- (1) Meet at least twice in each fiscal year; and
- (2) Keep written minutes of the actions taken at these formal meetings or otherwise maintain a record of proceedings.

(c) The role of trustees, administrators, faculty, and students and the nature and extent of the involvement of each in the determination of policies and the resolution of issues, including academic program and curriculum development.

Hedc 4065.043 Educational The Academic Program. The applicant shall describe its educational program in its written plan, including:

- (a) How the educational program reflects the purpose and mission of the institution through curricula;
- (b) Clearly and accurately describing curricula and learning goals in all published written and electronic materials;
- (c) Clearly stating the level of instruction and reflecting the resources of the institution, including but not limited to program support in the following areas:
- (1) Financial resources;
  - (2) Personnel;
  - (3) Facilities; and
  - (4) The level of academic preparation of the students;
- (d) The applicant shall provide evidence that it provides students with course syllabi that includes:
- (1) Course objectives;
  - (2) Course outcomes;
  - (3) Requirements; and
  - (4) Standards of achievement;
- (e) The applicant shall provide evidence that the internal structure of course(s) rests within the purview of the appropriate faculty and academic leadership;
- (f) The applicant shall clearly describe the process for development, review and approval of educational policy;
- (g) The applicant shall document provisions for a systematic and broad-based assessment of student learning, assessment of educational program(s), and the evaluation and improvement of instruction;
- (h) The applicant shall articulate a sequence of courses leading to the attaining of a degree in the respective area or field of study;
- (i) The applicant shall link program goals with achievement of student outcomes;
  - (j) At the associate degree level, the applicant shall have requirements for graduation that are based upon successful completion of a minimum of 60 semester hours of study;
- (k) At the baccalaureate degree level, the applicant shall provide evidence that the program:

- (1) Is planned to reflect a commitment to a particular area of inquiry;
- (2) Affords competence in the subject significantly beyond the introductory level; and
- (3) Is based upon successful completion of a minimum of 120 semester hours of study;

(l) If organized on other than the usual semester basis, the applicant shall ensure that the educational program provided contains at least as many hours as an institution organized on the usual semester basis;

(m) The applicant shall provide evidence that all courses offered by correspondence, online distance learning or away from the institution's primary campus are consistent with, and comparable to, courses offered to resident students enrolled at the institution's primary campus; ~~and~~

(n) The applicant shall ~~clearly state~~ its policies and procedures for consideration of transfer credits; and student expectations for attaining degree requirements.

(o) The applicant shall publish its graduation requirements in writing or on its website.

~~Hedc 405.04 Graduation Requirements. The applicant shall define graduation requirements in its written plan and no more than 50% of the credits required for a degree or other credential shall be awarded for prior experiential learning and/or credits by examination.~~

Hedc 4065.05 Faculty Teaching, Learning, and Scholarship. The ~~institution applicant~~ shall support teaching and learning through a well-qualified ~~describe the~~ faculty ~~in its written plan~~ and academic staff as follows demonstrate that faculty:

(b) ~~Are competent~~ Staff competence as evidenced by:

(1) Academic degrees from appropriately accredited institutions;

(2) Academic knowledge in the discipline in which they teach; and;

(3) Previous teaching experience which ensures that students will receive education consistent with the objectives of the program of study and the curricular requirements as stated in the institution's published catalogue and web site or electronic media; ~~and~~

(4) ~~Capacity to teach education programs per Hedc 405.03;~~

(c) Meeting or exceeding the following standards in a 2-year associate program:

(1) Faculty shall hold at least a master's degree or its equivalency as determined under Hedc 4065.05(a); and

(2) The entire faculty shall have education or equivalent experience in the field of specialization in which they are teaching;

(d) Meeting or exceeding the following standards in a 4-year baccalaureate degree program:

(1) Faculty shall hold at least a master's degree or its equivalency as determined under Hedc 4065.05(a), in the field of specialization in which they are teaching;

(2) At least 25% of the full-time faculty shall hold a doctoral degree or the appropriate terminal degree; and

(3) The entire faculty shall have education or equivalent experience in the field of specialization in which they are teaching;

(e) Meet or exceed the following standards in a master's degree program:

(1) Faculty shall hold at least a master's degree or its equivalency as determined under (g) in the field of specialization in which they are teaching;

(2) A majority of the faculty shall have satisfactorily completed work beyond the master's degree; and

(3) At least 40% of the full-time faculty shall hold a doctoral degree or an appropriate terminal degree;

(f) If teaching in a doctoral program, hold a doctoral degree;

(g) If teaching in a professional degree program, hold a doctoral or professional degree;

(h) If granted approval to teach by the institution, an equivalency for any of the positions listed in (b) and (c), or meets the following requirements:

(1) The institution shall state the reason for its equivalency in a narrative statement; and

(2) ~~All equivalencies shall meet or exceed the requirements of the published course syllabus;~~  
and

(3) The written job description for the position shall state what preparation is necessary to be considered equivalent to a candidate who has a degree in the field;

(i) Are sufficient in number to ensure student faculty ratios consistent with the mission of the institution, and meet the following numerical standards:

(1) The proportion of part-time faculty members and the student-teacher ratio shall be consistent with the institution's purpose to provide effective instruction and guidance in each course consistent with the institution's purpose; and

(2) ~~In no instance shall the faculty number fewer than 4 full-time members; and~~

(3) The faculty shall consist of full-time appointments sufficient in number and length of service to ensure continuity and stability of the educational programs;

(j) Have a teaching load consistent with the time essential for preparation for each class, other assigned academic or administrative responsibility, and professional growth including, but not limited to, the pursuit of terminal degrees in the field, the attendance at professional meetings, research and publications;

(k) Have professional and institutional responsibilities specifically defined in writing;

(l) Have expectations for continuing professional study and/or scholarly activity, and are encouraged to participate in professional meetings and other scholarly activity related to faculty disciplines;

(m) Have specified personnel policies concerning matters including, but not limited to, academic freedom, salaries and benefits, and incentive for professional growth. The institution shall adopt, maintain and follow policies governing initial appointments, reappointments and the dismissal of faculty, including adjunct faculty, and shall maintain records that evidence such policies are, in fact, followed;

(n) Are appointed pursuant to the established procedures of the institution, and such appointments shall be promptly reported, in writing, to the governing board of the institution;

(o) Are provided a written notice of appointment in which contains, or incorporates by specific reference, the conditions of employment and personnel policies with regard to academic freedom and economic security;

(p) Are sufficient in number, with a full-time commitment to the institution, and length of service to ensure continuity of the educational program; and

(q) Are provided a letter of appointment ~~written contract for employment~~ that includes information on salaries, fringe benefits, and provisions for academic freedom.

Hedc 4065.06 ~~Studentst~~ Body. The institutionapplicant shall supportdescribe the student body as followsin its written plan and ensure that the student body:

(a) Describing in its written plan the characteristics of the students it wishes to serve~~If admitted to an associate or baccalaureate degree program, shall be required to have a high school diploma or the equivalent;~~

(b) Describing in its written plan its orderly process of recruitment and admissions that complies with the requirements of legislation concerning equality of educational opportunity ~~If admitted to a master's or doctoral degree program, shall be required to complete at least a baccalaureate degree or the equivalent;~~

(c) Providing advising and academic support services appropriate to the student body~~Has access to standards for continued enrollment in the institution's catalogue or handbook;~~

(d) Developing a student record system that includes~~Has access to policies which shall include, but is not be limited to, appropriate~~health counseling in program planning, financial aid, academic transcripts, graduate employment, and performance on licensure examinations, as appropriate~~course selection, registration procedures, deadlines for course additions or withdrawals, basic course requirements, satisfactory progress requirements; and~~

(e) Ensuring security and maintenance by the institution as follows:

(1) Storing physical records in secure, fire-resistant cabinets;

(2) Securing electronic records so as to prevent loss; and

(3) Routinely maintaining a secure backup of physical and electronic records~~Has health services available, if attending an institution with residential facilities.~~

~~Hedc 405.07~~ Student Records. ~~The applicant shall describe its student records in its written plan and ensure that its student records:~~

~~(a) Include, but are not limited to health, counseling, financial aid and academic transcripts;~~

~~(b) Collect and maintain, insofar as is feasible, information concerning a graduate's activities including:~~

~~(1) Rate and field of employment;~~

~~(2) Continued education; and~~

~~(3) Performance on licensing examinations as appropriate; and~~

~~(c) Have security and maintenance ensured by the institution as follows:~~

~~(1) Physical records shall be stored in fire resistant cabinets;~~

~~(2) Records maintained in electronic systems shall be secured to prevent loss; and~~

~~(3) Duplicates of written and electronic records shall be periodically made and separately stored to assure security of records.~~

~~Hedc 4065.078~~ Institutional Library and Information Resources. ~~The applicant shall include in its written plan a description of institutional resources as follows:~~

~~(a) Human resources including, but not limited to:~~The applicant shall provide for library and information resources in its written plan.

(1) Human resources policies to include:

- a. Their availability;
  - b. How they are consistently applied; and
  - c. A procedure for their periodic review;
- (2) Clear terms of employment, to include salary and benefits;
- (3) A plan for equal opportunity inclusion with measurable objectives;
- (4) Procedures for the regular evaluation of all personnel; and
- (5) Policies and procedures regarding opportunities for professional development;
- (b) Financial resources including, but not limited to:
- (1) Plans that allow the institution to:
- a. Support and sustain its purpose;
  - b. Implement its program; and
  - c. Graduate its entering class as follows:
    - i. For institutions seeking associate degree-granting authority, this shall mean a minimum period of 4 years; and
    - ii. For institutions seeking baccalaureate, masters, and doctoral degree-granting authority, this shall mean a minimum period of 6 years;
- (2) Plans that allow the institution to adequately and effectively implement, achieve, and enhance its purposes and objectives as evidenced by the following:
- a. Financial policies, procedures, and practices that ensure academic quality; and
  - b. A business plan for the time period described in (a)(3)a. and b., which includes:
    - i. An enrollment plan which includes anticipated applications, deposits, yield and retention rates;
    - ii. Tuition and other sources of support; and
    - iii. Anticipated expenses;
- (3) A budget preparation process that is inclusive, and reviewed and approved by administrators and the institution's governing board;
- (4) A budget, sufficient in detail to identify operating expenses including categories for:
- a. Instruction;
  - b. Library;
  - c. Information resources and technology;
  - d. Student services;
  - e. Financial aid, including a calculation of the tuition discounting rate; and

- f. Operation and maintenance of the physical plant;
- (5) A chief financial officer responsible for administration of the financial resources with qualifications as follows:
- a. Expertise, education, academic degrees and an understanding of higher education finances;
  - b. Responsibility for the financial and business operations of the institution; and
  - c. Responsibility for its institutional budget, overseeing its formulation, revision and implementation;
- (6) Evidence to demonstrate fiscal soundness including, but not limited to, resources and a resource which shall ensure operations through the time period described in (a)(3)a. and b., to include, but not be limited to:
- a. Unrestricted net operating income demonstrating the institution's ability to live within its resources;
  - b. Resources necessary to meet covenants in any debt or other similar obligations of the institution;
  - c. Expendable reserves to sustain academic quality should resources in (e)(2) not meet expenditure needs in any given year; and
  - d. An existing realistic plan addressing issues raised by existing operational deficits, or in the event of a significant financial challenge or actual financial crisis to the institution or program, and reflecting significant assets to guarantee student protection;
- (7) A financial records monitoring process which shall:
- a. Be open for inspection and audit by the commission or its agents upon demand during normal working hours;
  - b. Be maintained in conformity with generally accepted accounting principles;
  - c. Include audited financial statements with an unqualified opinion for at least 2 consecutive years. Audited financial statements mean independently audited and certified annual financial statements which are completed within 6 months after the end of each fiscal year; and
  - d. Be kept in accordance with procedures that are sufficient to maintain financial integrity that gifts or grants given to the institution will be utilized according to the donor's or grantor's intent;
- (8) Evidence of insurance, or other instruments to secure financial obligation, carried to protect the school's financial interest, which shall be sufficient to maintain the solvency of the school in case of loss by fire or other causes, and to protect it from instances of personal and public liability; and
- (9) If the institution has or plans to incur debt, a plan, and procedures for maintaining and updating the plan, as needed, covering the period such debt will be outstanding which shows:
- a. The anticipated interest and principal payments throughout the life of the debt; and



b. The provision for payment of such interest and principal as it becomes due and payable.

(c) Information, physical, and technological resources, including, but not limited to:

(1) Library resources which shall include:

~~(b) The library shall:~~

~~a.(1) Have A~~ written plan ~~consistent in accordance~~ with the institution's purpose, the nature of the education program, and the enrollment;

~~(2)b. Have~~In-person and remote access provided to its basic physical and virtual collections. If other libraries or collections are to provide a major part of the library resources for the educational program, the extent of dependence shall be clearly stated and the nature and details of agreements shall be described;

~~c.(3) If engaged in an agreement with other libraries and entities providing access to resources,~~specify as referenc~~ed in b. above, a plan that specifies~~ the following:

~~ia.~~ ia. The degree to which the holdings of the other libraries or resources support the institution's educational program and enrollment; and

~~iib.~~ iib. The degree to which students of the institution can use these libraries or resources;

~~(4)d. Provide s~~Services including, but not limited to:

~~ai.~~ ai. Availability for in-person and remote student use at regularly posted times;

~~iib.~~ iib. In-person and remote Aavailability of resource and supervisory personnel and standard library services including, but not limited to, circulation, reference services, instruction and interlibrary loans; and

~~iiie.~~ iiie. Provisions for an atmosphere conducive to learning;

~~(5)e. A method for keeping~~Keep up-to-date records of circulation, holdings, inventory data, materials on order, current periodicals received, subscription data base usage, expenditures and budgets;

~~(6)f. Evidence of~~Have sufficient holdings consistent with the purpose, the course offerings, and enrollment of the institution;

~~(7)g. A method and timetable for~~Periodically review of its holdings to assure that the holdings remain consistent with the course offerings; and

~~(8)h. Have A~~ budget adequate to maintain the above standards.

(2) Physical and technological resources which shall include:

a. A description of physical and technological resources necessary for the achievement of the purpose in the applicant's written plan including:

i. Evidence that facilities are constructed and maintained in accordance with all applicable health and safety standards, codes, ordinances, and laws;

pr and ii. For facilities not owned by the institution, evidence through a lease or other documentation that facilities and technologies are available to meet the institution's stated objectives;

iii. A plan for how the institution provides information technology to support its academic and administrative operations; and

iv. Policies and procedures to ensure the integrity and security of data, and the privacy of individuals.

Hedc 406.08 Educational Effectiveness. The institution shall demonstrate its effectiveness by measures of student outcomes and program objectives as follows:

(a) Providing clear public statements about what students are expected to gain from their educational experience;

(b) Clearly stating objectives for student learning for each academic program;

(c) Demonstrating use of a variety of quantitative and qualitative methods, and direct and indirect methods to measure student outcomes and program objectives; and

(d) Demonstrating use of student and program assessments to inform its planning and resource allocation.

~~Hedc 405.09 Facilities and Technologies. The applicant shall describe its facilities and technologies in its written plan that shall:~~

~~(a) Be sufficient to meet the institution's programs and objectives;~~

~~(b) Comply with all applicable health and safety standards, codes, ordinances, and laws; and~~

~~(c) If not owned by the institution, be evidenced through a lease or other arrangements to ensure that facilities and technologies are available to meet the institution's stated objectives.~~

~~Hedc 405.10 Financial Resources. The applicant shall describe its financial resources in its written plan and its financial resources shall:~~

~~(a) Be adequate for the institution to:~~

~~(1) Support and sustain its purpose;~~

~~(2) Implement its program; and~~

~~(3) Graduate its entering class as follows:~~

~~a. For institutions seeking associate degree-granting authority, this shall mean a minimum period of 4 years; and~~

~~b. For institutions seeking baccalaureate, masters, and doctoral degree-granting authority, this shall mean a minimum period of 6 years;~~

~~(b) Be sufficient to allow the institution to adequately and effectively implement, achieve, and enhance its purposes and objectives as evidenced by the following:~~

~~(1) Financial policies, procedures, and practices that ensure academic quality; and~~

~~(2) A business plan for the time period described in (a)(3)a. and b., which includes:~~

~~a. An enrollment plan which includes anticipated applications, deposits, yield and retention rates;~~

~~b. Tuition and other sources of support; and~~

~~c. Anticipated expenses;~~

~~(c) Include a budget preparation process that is inclusive, and reviewed and approved by administrators and the institution's governing board;~~

~~(d) Have a budget, sufficient in detail to identify operating expenses including categories for:~~

~~(1) Instruction;~~

~~(2) Library;~~

~~(3) Information resources and technology;~~

~~(4) Student services;~~

~~(5) Financial aid, including a calculation of the tuition discounting rate; and~~

~~(6) Operation and maintenance of the physical plant;~~

~~(e) Be administered by a chief financial officer who shall have:~~

~~(1) Expertise, education, academic degrees and an understanding of higher education finances;~~

~~(2) Responsibility for the financial and business operations of the institution; and~~

~~(3) Responsibility for its institutional budget, overseeing its formulation, revision and implementation;~~

~~(f) Provide evidence to demonstrate fiscal soundness including, but not limited to resources and a resource plan which will ensure operations through the time period described in (a)(3)a. and b., including:~~

- ~~(1) Unrestricted net operating income demonstrating the institution's ability to live within its resources;~~
- ~~(2) Resources necessary to meet covenants in any debt or other similar obligations of the institution;~~
- ~~(3) Expendable reserves to sustain academic quality should resources in (e)(2) not meet expenditure needs in any given year; and~~
- ~~(4) An existing realistic plan addressing issues raised by existing operational deficits, or in the event of a significant financial challenge or actual financial crisis to the institution or program, and reflecting significant assets to guarantee student protection;~~
- ~~— (g) Be monitored through financial records which:~~
  - ~~(1) Are open for inspection and audit by the commission or its agents upon demand during normal working hours;~~
  - ~~(2) Are maintained in conformity with generally accepted accounting principles;~~
  - ~~(3) Include audited financial statements with an unqualified opinion for at least 2 consecutive years. Audited financial statements mean independently audited and certified annual financial statements which are completed within 6 months after the end of each fiscal year; and~~
  - ~~(4) Are kept in accordance with procedures that are sufficient to maintain financial integrity that gifts or grants given to the institution will be utilized according to the donor's or grantor's intent;~~
    - ~~(h) Establish that insurance is carried to protect the school's financial interest sufficient to maintain the solvency of the school in case of loss by fire or other causes, and to protect it from instances of personal and public liability; and~~
    - ~~(i) If the institution has or plans to incur debt, maintain and update, as needed, a plan covering the period such debt will be outstanding and showing:
 
      - ~~(1) The anticipated interest and principal payments throughout the life of the debt; and~~
      - ~~(2) The provision for payment of such interest and principal as it becomes due and payable.~~~~

Hedc 4065.0944 Integrity, Transparency, and Public Disclosure. The applicant shall, in the public disclosure section of its evaluation plan, include a catalog and supporting materials that are accessible electronically and that include the following:

- (a) Explicitly worded statements about its current status with the commission, approvals from required licensing agencies, regional, national, and specialized accrediting agencies;
- (b) Identification of mission, ownership and control of the institution;

(c) Information about the governing board, staff, ~~and~~ faculty, and the student body;

(d) Admission requirements;

(e) Courses, programs, degrees offered;

(f) Program objectives, length of program, curriculum offerings, and degree requirements;

(g) Rates of student success, including rates of retention, graduation and other measures of success appropriate to its institutional mission;

(h) Schedule of tuition, fees, availability of financial aid, expected amount of student debt upon graduation, and all other charges and expenses necessary for completion of the course of study;

(i) Procedures and policies related to transfer of credit, attending, and withdrawing ~~and a list of institutions with which it has an articulation agreement(s)~~;

(j) List of current faculty, indicating program affiliation, distinguishing between full and part-time status and showing degrees held/institution(s) attended;

(k) Cancellation and refund policies;

(l) Where to file student complaints and where to seek redress;

(m) Locations and programs available at branch campuses, other instructional locations, including those overseas, along with a description of programs and services available at each location; and

(n) Such other material facts concerning the institution as are reasonably likely to affect the decision of the student to enroll therein.

#### PART Hedc 4076 CONTINUING REVIEW

##### Hedc 4076.01 Annual Reports. ~~In-state~~

(a) Institutions under the jurisdiction of the commission shall file copies of correspondence and annual or other reports as required by its recognized regional or national accreditation agencies recognized by the U.S. department of education, the council for higher education accreditation, or both ~~accrediting association(s)~~.

(b) Institutions shall authorize such agencies to release these documents to the commission should this be required by the agency.

Hedc 4076.02 Additional Reports.

(a) Out-of-state institutions having commission approvals as described under Hedc 404.02(b)(2), (c)(2) and (3) shall file annual and/or other reports as specified in its commission approval(s). The director shall review and report compliance to the commission.

(b) In-state institutions under the jurisdiction of the commission shall be required to file annual and/or other reports as specified in its commission approval(s). The director shall review and report compliance to the commission.

(c) Additional report(s) shall be required at the discretion of the commission as necessary to provide additional information on the status of program approval.

(d) A comprehensive administrative review shall be conducted at the discretion of the commission to seek additional institutional or program information related to Hedc 405 regarding standards of evaluation.

Hedc 4076.03 Accreditation.

(a) In lieu of conducting its own independent program or institutional evaluation, the commission shall accept accreditation by a regional or national agency recognized by the U.S. Department of Education, the Council for Higher Education accreditation, or both, when the program or institution is in good standing with no special requirements.

(b) Any institution seeking initial degree-granting authority shall be in good standing with a regional or national accrediting agency recognized by the U.S. department of education, the council for higher education accreditation, or both, within 8 years of receiving initial commission approval.

(c) An institution may make a written application for a time extension to Hedc 406.03(b) for a period not to exceed 2 years. Reasons for an extension would be unforeseen internal or external circumstances causing a delay in the accreditation process. The approval for a time extension requires a majority vote of the commission.

(~~d~~e) Any change in status with accreditor(s), including notices of concern or probation notification, shall be provided to the commission to determine compliance with Hedc 405.

Hedc 407.04 Institutions Undergoing a Substantive Change in Governance. Any institution with a substantial change in governance, including a 50% or greater change in the composition of the governing board within a one-year period or decisions by the board which would affect the mission, character, and quality of the institution shall inform the commission by submitting the following:

(a) A letter and any documents explaining the reason for the changes, and how these changes will impact the mission, current operations, and students;

(b) Public disclosure, including a timeline and student and donor notification;

- (c) Any other substantive changes altering the current activity in Hede 40~~65~~;
  - (d) Any correspondence to and from institutional accrediting agencies;
  - (e) Documentation of change in incorporated status, such as creation of a sole membership;
- and
- (f) Any contracts detailing arrangements regarding development of courses, programs or degrees
- by a non-title IV eligible entity.

Hede 40~~76~~.05 Institutions Undergoing an Acquisition, Merger, Transfer, Sale of Assets. Any institution undergoing an acquisition, transfer, sale of assets if more than 25%, or merger, shall inform the commission by submitting the following:

- (a) A letter explaining the reason for the change; and
- (b) A transition plan and timetable that includes, but is not limited to:
  - (1) Public disclosure and student and donor notification;
  - (2) Evidence of sufficient fiscal resources to support the transition;
  - (3) Accreditor(s) expectations;
  - (4) Any correspondence to and from institutional accrediting agencies;
  - (5) Legal documents related to the transition;
  - (6) Most recent audited financial statement;
  - (7) Any changes in:
    - a. Mission;
    - b. Board appointments;
    - c. Internal governance and leadership structure;
    - d. Institutional leadership appointments;
    - e. Faculty and staff appointments, along with terms of employment, including, but not limited to, working conditions and benefits;
    - f. Enrollment;

- g. Program offerings; and
  - h. Facilities; and
- (8) Any other substantive changes altering the current activity in Hedc 4065.

Hedc 4076.06 Institutions Undergoing Closure.

(a) Any institution that plans to close shall inform the commission by forwarding the following:

(1) A transition plan and timetable that addresses and includes, but is not limited to:

- a. Public disclosure and student and donor notification;
- b. Changes in internal governance and leadership structure; and
- c. Changes in faculty and staff appointments;

(2) A plan for discontinuation of programs that includes:

- a. Number of students impacted;
  - b. Teach-out schedule detailing program completion at current institution; and
  - c. Evidence of arrangement with another accredited institution for student transfer;
- (3) Evidence of fiscal resources necessary to support the transition;
- (4) Accreditor(s) expectations; and
- (5) Any correspondence to and from accrediting agencies.

(b) Pursuant to RSA 292:8-kk, any institution that closes shall also submit the following:

- (1) Two signed original transcripts and ~~an~~ one signed electronic transcript for each student who was enrolled for instruction at the institution;
- (2) One original copy of catalogs for each year in existence;
- (3) An explanation of the institution's credit and grading system; and
- (4) A typed list of students.



Hedc 4087.01 Violations.

(a) Alleged violations of RSA 292:8-g and RSA 292:8-h shall be reported by the commission to the department of justice for enforcement.

(b) Written notification of alleged violations shall be given to the institution by the director.

(c) Institutions shall provide a written response to the commission within 30 calendar days.

(d) The commission shall consider the institution's response and provide the opportunity for the institution to make an oral presentation.

(e) Any institution dissatisfied with the commission's decision may request a hearing within 60 days of the commission's decision.

Hedc 4087.02 Suspension or Revocation of Authority.

(a) Degree-granting authority of any institution which no longer meets the standards established by rules shall be suspended or revoked, pursuant to RSA 21-N:8-a,II(e).

(b) Any institution which has not conducted regular instruction for 3 consecutive years and whose charter has not been repealed pursuant to RSA 292:8-ff IV, shall be evaluated before resumption of instruction.

(c) Degrees which an institution has not awarded for 4 years shall be evaluated pursuant to Hedc 405 prior to the re-awarding of any such degree.

Hedc 4087.03 Hearing. Any institution dissatisfied with the commission's decision may request a hearing within 60 days of the date of the commission's decision.

PART Hedc 4098 FEES

Hedc 4098.01 Fees.

(a) Fees for commission reviews and actions, and professional stipends, shall be as specified in Table Hedc 400-1 below.

Table Hedc 400-1 Schedule of Required Institutional Fees

Table Hedc 400-1	
SCHEDULE OF REQUIRED INSTITUTIONAL FEES	
Action	Fee
<b>INCORPORATION</b>	
New institution – main campus in New Hampshire	\$10,000
<del>New institution – main campus outside the U.S.</del>	<del>\$20,000</del>
Out-of-state incorporated/branch campus in New Hampshire	\$10,000
<b>COMMISSION REVIEWS</b>	
Comprehensive Review <del>(per program)</del>	\$ <del>2,500</del> 1,500
<del>Expedited Review (per program)</del>	<del>-\$ 1,000</del>
Administrative Review <del>(per program)</del>	\$ <del>750</del> 500
Accreditation Observation by Director	\$ 500
Annual Report from Out-of-State Institution (Hedc 406.02 (a))	\$ 500
<b>REVIEW FOR SUBSTANTIVE CHANGE IN GOVERNANCE</b>	
	\$ <del>2,550</del> 750
<b>REVIEW OF ACQUISITION, MERGER, TRANSFER, OR SALE OF ASSETS</b>	
	\$ <del>2,500</del> 1,000
<b>INSTITUTIONAL CLOSURE</b>	
	\$ 3,000
<b>DISCIPLINARY ACTION</b>	
	\$ 3,000
<b>STIPENDS</b>	
Chair – in-state site visit	\$ <del>2,500</del> 2,000
Chair – international site visit	\$ 3,000
Team Member – in-state site visit	\$ <del>1,500</del> 1,000
Team Member – international site visit	\$ <del>2,000</del> 1,500

Accreditation Observer – in-state site visit	\$ <del>2,000</del> 1,000
Accreditation Observer – international site visit	\$ <del>3,000</del> 1,500
CLOSED SCHOOL TRANSCRIPTS	
Transcript Request Fee per transcript	\$ <del>25</del> 20

(b) All direct costs for institutional and/or program evaluations shall be the responsibility of the requesting institution.

(c) Evaluators/observers shall be reimbursed for all expenses related to the evaluation, such as travel, lodging, and meals. Payment shall be made to the individual, but forwarded to the commission for recording 10 days following the site visit.

(d) Checks for required fees shall be made payable to: Treasurer, State of New Hampshire and

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forwarded to the commission prior to on-site visits.

**Edit.** "Hedc 405.02."

**Appendix**

<b>Rule</b>	<b>Specific Statute the Rule Implements</b>
Hedc 401	RSA 21-N:8-a,II,(a)
Hedc 402	RSA 292:8-h
Hedc 403	RSA 21-N:8-a, II(a)-(d)
Hedc 404	RSA 292:8-c; RSA 292:8-h
Hedc 405.01-Hedc 405.2	RSA 292:8-f
Hedc 405.03-Hedc 405.06	RSA 292:8-f; RSA 292:8-ff
Hedc 406	RSA 292:8-f
Hedc 407.01-Hedc 407.02	RSA 292:8-ff
Hedc 407.03	RSA 21-N:8-a,II,(e)(1)
Hedc 407.04	RSA 292:8-ff,II,(b)
Hedc 407.05	RSA 292:8-ff,II,(a)
Hedc 407.06	RSA 292:8-k
Hedc 408.01	RSA 292:8-ff, III
Hedc 408.02	RSA 21-N:8-a,II(e)
Hedc 408.03	RSA 541-A:30-a, V
Hedc 409	RSA 21-N:8-a, II(e)(6)

**NH Department of Education  
Division of Educator Support and Higher Education  
Higher Education Commission**

**February 14, 2023: Commission Meeting  
Director's Report**

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**REPORT OF OUT-OF-STATE MEETINGS**

None

**STAFF DEVELOPMENT/OFFICE ISSUES/OTHER**

None

**COLLEGE AND UNIVERSITY ACTIVITY**

**In-State Colleges and Universities:**

**American University of Madaba, Jordan (AUM):**

(See International Colleges and Universities below)

**Antioch University: 2022 Annual Report**

Antioch University is based in Yellow Springs, OH and, in addition to Keene, NH, supports graduate education centers in California and Washington state. Antioch also works with charter and private schools in Conway and Wilton, NH. The University is regionally accredited by the Higher Learning Commission and has been accredited since 1927. Its next comprehensive evaluation is scheduled during the 2023-2024 academic year. The University's interim report to the HLC was accepted on June 29, 2020. Antioch New England has been based in Keene, NH since the early 1970's and enrolled 1150 students in the summer and fall of 2021, and 1154 in fall 2022 in master's degrees, graduate certificates and three doctoral degree programs. Their 2022 annual report serves to notify the NH Commission of Higher Education of several program changes as detailed below.

**Applied Psychology:**

- The Art Therapy concentration in the MS in Clinical Mental Health Counseling has been removed. The Commission review notes that this concentration was listed as a new program in the 2021 annual report.
- A name change, from the Certificate in Trans Affirmative Therapy to Certificate in Gender Affirming Clinical Practice.
- Education: Teach-outs in the following five (5) programs.
  - M.Ed. in Elementary/Early Childhood Education (Integrated Learning)
  - M.Ed. in Elementary/Early Childhood Education (Waldorf Certification)
  - Certificate in Library Media Specialist
  - Certificate in Digital Learning Specialist (This certificate designation was changed from Educational Technology Integrator in the 2021 annual report)
  - Post Masters Certificate in Educational Leadership and Administration (This program was identified as "on hiatus" or not accepting new students in the 2021 annual report)
- This is the second year in which Antioch University has made several programs changes, indicating some uncertainty as to program alignment and direction. For the Commission's information, the program changes cited in the University's 2021 annual report are presented below to give a more comprehensive picture of the scope of program changes at the Keene campus over the past two years.

Antioch's 2021 annual report notified the NH Commission of Higher Education of the program changes detailed below:

#### Program Name Changes:

- Ph.D. in Marriage and Family Therapy to Couple and Family Therapy.
- Certificate in Marriage and Family Therapy to Couple and Family Therapy
- Certificate in Educational Technology Integrator to Digital learning Specialist
- Certificate in Environmental and Sustainability Education to Environmental Education and Sustainability
- New Programs:
- M.A. in Clinical Mental Health Counseling and Art Therapy
- M.A. in Waldorf Education
- M.A. in Humane Education
- M.S. in Interdisciplinary Environmental Studies
- Certificate in Dance/Movement Therapy
- Certificate in Trauma Counseling
- Certificate in Problem Based Learning
- Certificate in Nature Based Early Childhood Education
- Certificate in Transdisciplinary Studies in Healing Education

#### On Hiatus; Not accepting new students:

- M.A. in Interdisciplinary Studies
- M.S. in Applied Behavioral Analysis
- M.B.A. in Sustainability
- Post-Master's Certificate in Educational Leadership and Administration
- Certificate in Sustainable Business
- Certificate in Autism Spectrum Disorders
- Certificate in Applied Behavior Analysis

Given the number of program changes in 2021 and 2022, the Director reminded the University that it has the responsibility to complete students in suspended programs, and to properly staff new programs.

The Director also reminded the University that the NH Higher Education Commission wishes to have an observer present at the HLC comprehensive evaluation visit in December 2023. The Director plans to conduct a campus visit in Spring 2023.

#### **Hellenic American University (HAU):**

(See International Colleges and Universities below)

#### **Magdalen College:**

(See NECHE below)

#### **MCPHS University: 2022 Annual Report**

MCPHS University submitted its annual report on the five (5) degree programs that it offers at its campus in Manchester. All programs are in the health sciences, are accredited by the appropriate accreditation association, and approved without terminal dates by the NH Commission. The University is regionally accredited by NECHE through 2027. Its 5th Year Interim Report was accepted by NECHE without recommendations.

**Bachelor of Science in Nursing (BSN) (fast-track):** The program is accredited by CCNE and the NH Board of Nursing through 2031. Enrollment has experienced enrollment and graduation declines from 188 to 53, and 87 to 18 over the past two years. The NCLEX-RN pass rate is strong at 93.4%.

**Master of Science in Nursing (MSN):** The MSN in person program, and has enrolled no students nor produced any graduates over the past two years. The University has transitioned this to a fully online program Family Nurse Practitioner – MSN program. CCNE has approved this substantive change. This program graduated 75 students in 2022 and currently enrolls 144 students. As this is no longer a NH based program, the University requested the removal of this program approval by the Commission and thus the requirement for future annual reports. The Director approved this request in a letter to the University in January 2023.

**Master of Physician Assistant (MPA):** The MPA program is accredited by the ARC-PA through 2027. Enrollments are steady averaging 106 with an annual graduating class of 53. The national certification examination, PANCE, has a standard of 85% pass rate that each program class must meet. The MCPHS MPA classes of 2019 and 2020 exceeded this

standard. However, the class of 2021 had a pass rate of 83%, which requires the University to submit a report on or before March 1, 2023. The Commission will receive a copy of this report March 2023, and any subsequent correspondence from ARC-PA. The University has already implemented efforts to support students in preparation for the PANCE.

**Master of Science in Occupational Therapy (MSOT):** The MSOT is accredited by ACOTE through 2023. A re-accreditation visit will be conducted for the Manchester site in 2024, and the NH Commission is able to have an observer at the on-site visit. Enrollment has been steady, averaging 80 with 40 graduates annually. Pass rates on the national examination (NBCOT) is 95%, well above the standard of 80%.

**Doctor of Pharmacy (PharmD):** The PharmD is accredited by the ACPE, with a re-accreditation visit scheduled for Fall 2023, and the Commission will receive any ACPE reports and correspondence, and will be informed of the site visit date. The Commission may choose to have an observer at the on-site visit. Enrollment has declined from 116 to 66, and graduates have declined from 55 to 35 over the past two years. The report notes several curricular changes and increased support for students preparing for the national examination (NAPLEX). Graduates are meeting the standard for the NAPLEX pass rate.

### **New England College: 2022 Annual Report**

**RN to BSN Degree Completion Program:**

The College has an approved RN to BSN Degree Completion Program which was developed by the College for a collaboration with the Dallas, TX Community College District on the Brookhaven campus. The launch of this program was stymied by Covid-19 restrictions. Subsequently, the Dallas College developed its own RN to BSN program. Currently the RN to BSN program is in hiatus as the College considers how this program might be utilized along with its existing nursing program. CCNE has not been engaged with this program as it has not been launched.

**Clinical, Cooperative BSN Degree Program (3-year):**

The CC-BSN program was launched with 31 students in Fall 2022, with 28 persisting on to Spring 2023. The College is on track to enroll 60 new students in Fall 2023. The NH Board of Nursing approved the program in November 2021 with a first report expected in June 2023. NECHE approved the program as a Substantive Change, also in November 2021. The program has been accepted by CCNE as New Applicant (April 2022), with a site visit for initial accreditation scheduled for April 2024. The College's report detailed the NECHE submission, and included correspondence from the NHBON, CCNE, and NECHE. A new faculty hire was noted, with CV, as was a contract with Catholic Medical Center in Manchester. There were no curricular changes. The program has received a grant of \$80,000 from the Alden Trust to enhance its nursing laboratory.

### **Signum University:**

On October 27, 2022 the Director attended the Distance Education Accreditation Commission (DEAC) self-study review with the institution of their third Self-Evaluation Report (SER). The review was conducted via Zoom over the course of one day and covered each of DEAC's standards. The primary goal of this third review was to provide guidance to the institution as they prepare for an on-site evaluation in the summer of 2023. The timing of that review is being dictated by DEAC due to workload at the accreditor as the institution had requested a spring visit.

Overall, the review went very well with the institution providing DEAC updates from their second SER in areas such as Governance and Institutional Effectiveness. DEAC made a note of complimenting the institution on its record of continuous improvement across its reports. The DEAC reviewer also advised Signum on several topics including their budget development system and Agile strategic planning model. DEAC also answered many questions about their process and timelines, which was very helpful to Signum.

The next step for Signum will be a curriculum review this winter followed by the previously mentioned full site visit in the summer of 2023. The Commission will have an observer at both upcoming DEAC visits.

## **St. Anselm College: 2022 Annual Report**

The BA/MA in C&J is in its second year of operations. There is continued interest in the program with a second-year cohort of 15 students. The program now offers thesis and professional tracks, and courses in online (synchronous and asynchronous) delivery to meet student preferences. Enrollments have exceeded initial expectations and financial records indicate positive results for both years of the program. Detailed information regarding student demographics, academic performance, and student research and internship interests were provided. There were some curricular modifications with the syllabi provided for additional courses in Crime Mapping and Crime Typologies Seminar in the War on Drugs. The full and part-time faculty numbers are unchanged, and plans call for an additional faculty position in year three. The program content and delivery continues to evolve to meet the needs of the varied lives of graduate students. Discussions are underway to design an entry pathway for those who are not alumni of the College's C&J undergraduate degree program.

The M.Ed. which offers licensure in General Special Education (K-12), and High Leverage Practices (HLP) in Special Education entered its first cohort class of three students in 2022. This program was initially approved through December 31, 2024 by the Commission in October 2021. The program was subsequently approved by the NH State Board of Education, upon the recommendation of the Council for Teacher Education. NECHE has also reviewed and endorsed the program as part of the College's 2021 application for a Substantive Change.

The report included details regarding curricular changes and the CVs of the full and part-time faculty teaching in the program. The number of credits for the degree has now been set at 37. The online courses are delivered primarily during the summer with internships being during the school year. Provisions have been made for the admission St. Anselm alumni and non-alumni, and for part-time and full-time enrollment. The initial cohort of students did not meet expectations, but the program is on track for stronger enrollments in 2023.

## **St. Joseph School of Nursing (SJSON): 2022 Annual Report**

### **Certificate Programs:**

SJSON reported on its two certificate training programs: Medical Assisting and Phlebotomy. The Medical Assisting program requires 288 hours of class time and 160 hours of externships, and the Phlebotomy program requires 120 hours of class time and 32 hours of externships. Enrollment for both programs have been modest. All externship sites are either at St. Joseph Hospital or one of its laboratory sites or practices. The Medical Assisting program has had mixed results with retention and the achievement of program objectives, although some graduates are successful in passing the national certification examination. The Phlebotomy program has a stronger completion rate and achievement of program objectives, as well as measures of student satisfaction.

### **Degree Programs:**

St. Joseph School of Nursing (SJSON) offers an Associate of Science in Nursing, and Licensed Practical Nurses (LPNs) returning to continue their education to become a Registered Nurse (RN).

During 2022, the school offered a Phlebotomy Training Program and a Medical Assisting Training Program, both offered at the Milford NH site. They also offered a nursing assistant course at the Nashua campus. All programs have been reviewed and approved by the Accrediting Commission of Career Schools and Colleges (ACCSC) through 2025, and the nursing assistant program has been approved by the NH Board of Nursing. The AS in Nursing program is accredited by ACEN through 2025, and by the NH Board of Nursing. The Nursing Assistant program is offered on a continual basis, and the Phlebotomy and Medical Assisting program are offered on a rotating basis.

173 students were enrolled in the ASN program in 2022. There were fifty-seven (57) graduates in 2022. The Nursing Assistant program enrolled thirteen (13) students, the Phlebotomy program enrolled eight (8) students and the Medical Assisting program enrolled six (6) students.

There have been no substantive changes to the Nursing program curriculum. During 2022, one part-time instructor retired, and a full-time instructor moved to take a clinical position at the hospital. The faculty numbers 1.4 FTE plus two adjunct faculty.

### **Accreditation Activities:**

SJSON is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC). The Commission conducted a two person on-site visit to the SJSON satellite instructional center in Milford, NH on August 30, 2022, and provided its



report to SJSON on December 18, 2022. The report reviewed the enrollments at Milford and the curriculum and documentation of the program. The report cited four (4) concerns in the areas of how the SJSON presents and explains the relationship between the main campus in Nashua and the site in Milford, the accuracy of information on the titles of its accredited programs, and the use of enrollment agreements that do not contain all the elements required by the ACCSC.

The SJSON prepared a response on these items to the ACCSC on January 13, 2023. It provided narrative and evidence that it had made corrections and clarifications in its catalog, its enrollment agreement, and on other institutional communications to come into compliance with the concerns noted by the ACCSC.

**New England Commission of Higher Education (NECHE) Activity:**

**American University of Madaba (AUM):**

(See below under International Institutions)

**Hellenic American University (HAU):**

(See below under International Institutions)

**Magdalen College:**

The College filed its required progress report with NECHE on October 25, 2022. The narrative report, with related Annual Report of Finance and Enrollment (ARFE) tables, was in response to the September 24, 2021 letter from NECHE, that placed the College on probation related to the Standard on Institutional Resources. The report noted progress on four goals established for the December 2021 – September 2022 period.

- Increased Fund Raising; The goal of raising \$2M was met, enabling a FY 2022 operating surplus with funds also available for support in FY 2023.
- Reduction in the Tuition Discount Rate: The tuition discount rate was at 74% for FY 2022, with a goal of 62% by FY 2025. The actual rate for FY 2022 was brought down to 64.5%, so the FY 2025 goal was reset to 60%. This has resulted in a net tuition increase of \$3,000 per student.
- Reverse Recent Enrollment Declines: The Fall 2022 new student enrollment goal of 22 students was not met. Feedback indicated that the NECHE probation status hurt new student enrollment. The Fall 2022 new student enrollment was 15. The goal for Fall 2023 is 20 new students, and moving up to 27 in Fall 2024 and 36 in Fall 2025.
- Bringing More Students to Campus: Summer programs, open houses and special events have been bringing more students to campus, with good initial results as noted above.
- Tuition will be held at \$23,600 through FY 2025. Cash flow is sufficient for operations and financial projections are stable. A goal of raising an average of \$1.2M annually has been set.
- On January 9, 2023 NECHE notified Magdalen that the Commission had accepted the College's report and its Annual Report on Finance and Enrollment (ARFE).

The NECHE Commission continued the College on probation regarding the Standard on Institutional Resources. While recognizing progress in finances and stabilizing enrollment, the Commission also noted the near-term challenges in these areas. The Commission confirmed its Comprehensive Evaluation visit in March 2023. The NH Commission will receive the College's self-study and will have an observer present for the on-site NECHE visit in March.

**Rivier University:**

NECHE conducted a comprehensive evaluation of the University on October 30, 2022 – November 2, 2022. This was the normal decennial evaluation based upon the institution's self-study. The Chair of the eight (8) person team complemented the institution on its thorough and clear self-study, and the University's welcoming and open dialogue with in her exit report to the President, Trustees, Administrators, Faculty, and members of the campus community. This was a very positive review as the Chair summarized commendations and challenges within all nine (9) of the NECHE Standards. The team findings aligned well with the University's forward- looking plan, "Go Boldly" which has identified eight (8) initiatives for future work at Rivier. The initiatives are in the areas of: Diversity, Equity & Inclusion, Cyber

Security and Behavior Health programming, Institutional Technology enhancements, new residence halls to accommodate growth in undergraduate enrollment, judicious enhancements to its NCAA Division III athletic program, enhancing program assessment and predictive analytics to support retention and graduation, enhancing existing academic facilities, and implementation of an ERP administrative technology platform. The institution's undergraduate and graduate enrollment is steady, and its financials are strong with operating budgets providing annual surpluses, and a growing endowment.

The NECHE evaluation report will be complete in December, and the recommendation for continued accreditation will go to the NECHE Commission in the Spring of 2023. The New Hampshire Higher Education Commission will receive a copy of the evaluation report and a copy of the final accreditation correspondence from NECHE in Spring 2023.

### **Upper Valley Educators Institute (UVEI):**

NECHE has affirmed its on-site biennial evaluation for the Spring of 2023, a normal process for Candidate institutions.

### **Out-of-State Colleges and Universities:**

**Administrative Approvals for Online Programs:** *Administrative approval is granted to institutions within states that are not members of the NC-SARA or have elected to not participate through NC-SARA to operate in New Hampshire and offer online degrees that require a practicum/internship/clinical.*

### **Chamberlain University: Administrative Approval**

Chamberlain University is a for-profit organization based in Chicago, IL, and is a member of Adtalem Global Education, Inc., which also owns the Ross University School of Medicine and Walden University. Adtalem was formerly known as the DeVry Educational Group.

Chamberlain became a university in 2006 and traces its roots to 1889 when it was founded as The School for Deaconesses in St. Louis, MO. Since its founding it has focused on nursing and health careers and its degree programs date to the 1980s. The University now has 23 campus locations in 15 states, the closest to New Hampshire being in Brunswick, NJ. It serves approximately 30,000 students evenly split between undergraduate and graduate programs. The average student age is 38, is 90%/10% female/male, 55% white, 18% black, 12% Hispanic, 8% native American, and 7% other, with a 74% graduation rate. Tuition ranges from \$555 - \$695 per credit hour. Instruction is offered in-person and online using Canvas as the LMS. The University is organized into two schools, the College of Nursing and the College of Health Professions. The University is regionally accredited by the Higher Learning Commission, and is a member of SARA. It has received the necessary state approvals for the states in which it maintains instructional sites.

Chamberlain University's mission is to "educate, empower and embolden diverse healthcare professionals who advance the health of people, families, communities and nations."

The University sought Administrative Approval for the following 17 degree and certificate programs.

- Bachelor of Science in Nursing (Online Option)
- RN to BSN Degree Completion Option (Registered Nurse to Bachelor of Science in Nursing)
- Master of Science in Nursing (MSN), with specialty tracks offered within the degree program in:
  - Healthcare Policy
  - Nurse Educator
  - Nurse Executive
  - Nursing Informatics
  - Population Health
  - Family Nurse Practitioner (FNP)
  - Adult-Gerontology Acute Care Nurse Practitioner (AGACNP)
- Adult-Gerontology Primary Care Nurse Practitioner (AGPCNP)
- Psychiatric-Mental Health Nurse Practitioner (PMHNP)
- Graduate Certificate in Healthcare Policy
- Graduate Certificate in Nursing Education
- Graduate Certificate in Nursing Informatics
- Graduate Certificate in Nursing Leadership
- Graduate Certificate in Population Health
- Graduate Certificate in Family Nurse Practitioner
- Graduate Certificate in Adult-Gerontology Acute Care Nurse Practitioner

- Graduate Certificate in Adult-Gerontology Primary Care Nurse Practitioner
- Graduate Certificate in Psychiatric-Mental Health Nurse Practitioner
- Accelerated RN to MSN Option (with or without Clinical Nursing Leadership Option)
- Accelerated MSN Option (with or without Clinical Nursing Leadership Option)
- Doctor of Nursing Practice (DNP)
- Master of Public Health
- Master of Social Work

Chamberlain provided all the required materials with its application to the Commission. The University catalog offers substantial details regarding its academic programs, costs for tuition and fees, Title IV federal financial aid options, and related academic and student policies. Faculty credentials were included as well as syllabi for the academic programs. The University presented 42 clinical agreements and 50 institutional program agreements with New Hampshire health care institutions and organizations. The nursing programs, bachelor, master, DNP, and graduate certificates are accredited by CCNE. The Master of Public Health is accredited by CEPH, and the Master of Social Work is accredited by CSWE. Graduates of the AGACNP, AGPCNP, and PMHNP are eligible to sit for the national certification examinations. The catalog content is clear on alerting students of the need to be aware of any state regulations regarding licensure.

The Director granted Administrative Approval for the above 17 programs through June 30, 2025 with the requirement that Chamberlain University submit annual reports on or before December 31<sup>st</sup> regarding any curricular, faculty, or accreditation actions, and the number of NH students being served by its programs.

### **MTI College: Administrative Approvals**

MTI College, founded in 1965, and owned by the Compass Group, Inc., is a for-profit vocational school based in Sacramento, CA. The institution is approved by the State of California and accredited by the Accrediting Commission for Community and Junior Colleges (ACCJC) of the Western Association of Schools and Colleges (WASC) through 2027.

The College offers primarily diploma programs in information technology, business, law, health care, and cosmetology. It has Associate in Arts Degree programs in Business Administration (general and accounting tracks), and Paralegal Studies. The Paralegal Studies program is also accredited by the American Bar Association (ABA). The institution serves about 750 students, is approved for Veterans benefits, and offers Federal USDOE Title IV financial aid programs. Tuition is \$230 per credit hour. Instruction scheduled on a quarter calendar is offered in-person and online. The College provided syllabi for the two programs using a common format which includes the mission of the College and institutional outcomes as well as the usual course objectives, class assignments and academic integrity language. Faculty CVs indicate that most faculty on the paralegal program are local while those teaching in the business program are geographically dispersed using the online format.

The Director authorized Administrative Approval of these two programs through June 30, 2025, with the requirement for reports due by December 31<sup>st</sup> annually.

### **Northcentral University (Formerly Northcentral University): 2022 Annual Report**

Northcentral University, now merged with National University, is an online institution founded in 1996 and based in La Jolla, CA. It was initially a for-profit, but became an affiliate of the not-for-profit National University System, based in San Diego, CA in 2019. The system now includes Northcentral University, National University, and the City University of Seattle. Recently these entities formally merged into a single corporation, now called National University, which serves about 30,000 students.

The Western Association of Senior Schools and Colleges approved the merger, effective June 30, 2022. There is a prominent tab on the website that explains the merger and that the Northcentral name will eventually disappear. This merger was confirmed by a separate letter to the Commission on December 13, 2022, noting that National University is complying by registering in the State of New Hampshire.

National University/Northcentral University has 25 of its academic programs approved by the NH Commission through June 30, 2023.

### **Rocky Vista University College of Osteopathic Medicine (RVU – COM): Administrative Approval**

Rocky Vista University is based in Parker, Colorado with campuses in Ivins, Utah and Billings, Montana. It was founded in 2006, as a for-profit institution with academic programs focused in the health sciences. RVU is not a member of SARA and must seek State of New Hampshire approval for any of its programs that might have a practical, clinical, or internship program here. The institution is regionally accredited by the Higher Learning Commission (HLC), and will undergo its next comprehensive evaluation visit in 2023-2024.

RVU made application for Administrative Approval for its Doctor of Osteopathic Medicine (DO) program. The program is accredited (since 2012) by the American Osteopathic Association (AOA) through its Commission on Osteopathic College Accreditation (COCA). The DO program is four years in length with the first two years being didactic instruction and the final two years being primarily clinical experiences. The curriculum and faculty are clearly described in the University catalogue, and the tuition is \$62,080 per year. The DO program is accredited for all three campuses and the University graduates over 100 students each year. Pass rates on the national DO examination is at or above the national average.

The Director extended a letter of Administrative Approval for the DO program through June 30, 2024, with the requirement of annual reports.

### **South University: 2022 Annual Report**

South University, a private, not-for-profit university, was founded in 1899, is based in Savannah, GA, but has 12 additional education centers around the country. It is regionally accredited by the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), and serves approximately 5400 online students in Associates, Bachelors, Masters, and Doctoral programs that are “focused and flexible”.

The University is accredited through 2024, and has had several ownership changes, organizational changes and financial challenges over the past six years. The University was previously a for-profit institution but is now listed corporately as a not-for-profit. However, the US Department of Education lists it as a for-profit institution in its IPEDS data system. The University has had financial challenges and the SACSCOC lists it at risk of not meeting its financial resources standard. The NH Commission has received South’s April 1, 2022 progress report to SACSCOC. The audited financials show a significant improvement in profitability and the debt service ratio from calendar year 2020 to 2021. The University reported an operating surplus of \$5.3M compared to a loss in 2020, primarily due to enrollment gains.

South University currently has Administrative Approval to offer 40 of its Associate, Bachelors, Masters, and Doctoral online programs through June 30, 2024. They were originally approved in 2018.

The 2022 annual report listed 24 New Hampshire students for the past year. One graduate in the RN to BSN, and one in the AS in Medical Assisting. Pending graduates with one in the AS in Medical Assisting and one in the RN to MSN program. The RN to MSN student did practicum placements in Hinsdale, Concord, and Manchester, NH. Enrollment was quite mixed showing only 2 active students, 5 inactive, 4 dismissed, and 8 withdrawals. Tuition and fees are found in the catalog, but it is not easy to find on the website.

### **The Chicago School of Professional Psychology (TCSPP): 2022 Annual Report**

TCSPP is a private, not-for-profit institution of higher education based in Chicago, IL, with six additional instructional locations around the country (three in California), and an online delivery modality, as well.

TCSPP serves some 6,000 adult and mid-career students, has an operating budget of \$136M and steady operating surpluses. It is regionally accredited by the WASC through 2027, and many of its programs are also accredited by professional associations.

In July 2022 the Director granted Administrative Approval for 14 programs through June 30, 2024.

TCSP reported that as of December 2022 it had only one New Hampshire enrolled, who has matriculated in the Ph.D. in Applied Behavior Analysis program.

### **University of St. Augustine for Health Sciences:**

The University of St. Augustine for Health Sciences was founded in 1979, is based in San Marcos, CA, and all programs are in the health sciences at the graduate level. The University maintains campuses in California, Texas and Florida, and is regionally accredited by the Western Association of Senior Colleges Commission (WSCUC) through 2027. The University is a private, for-profit corporation owned by Atlas Partners, a private equity firm.

The University's programs are offered mostly online (85%) with students (5,200, 70/30 Female/Male) seeking their required experiences in practicum, clinical, internship, or fieldwork with local health care providers close to their home of residence. Students residing close to one of the physical sites can enroll in hybrid classes with some face-to-face classes on campus. All of their health -related programs are accredited by the appropriate program accreditation associations. The University has submitted comprehensive documentation including curricular structures, course syllabi, and faculty credentials. The academic programs appear rigorous with appropriate numbers of credit hours. Tuition and related costs are easy to access. They provide students with detailed information regarding eligibility for taking qualifying examinations or licensure qualifications, and the importance for students to be knowledgeable about the varying regulations of the state in which they plan to practice.

The Director previously granted Administrative Approval for the following programs through June 30, 2023 with annual reports required.

- Master of Occupational Therapy
- Doctor of Occupational Therapy
- Doctor of Physical Therapy
- Master of Science in Nursing
- Doctor of Nursing Practice
- Post Graduate Nursing Certificate – FNP
- Master of Science in Speech and Language Pathology (MS-SLP)

The University submitted a proposal in November 2022 for two Master's in Nursing (MSN) specialty programs: a MSN in Psychiatric Mental Health Nurse Practitioner (PMHNP) and a MSN in Adult Gerontology Nurse Practitioner (AGNP). Both programs require 55 credit hours of combined didactic and clinical work. The university's nursing programs are accredited by CCNE, and the additional clinical and capstone courses were approved by WSCUC. Program information alerts students to be aware of state requirements for licensure. A compendium of student resources and faculty names and qualifications were included with the application.

The Director issued a letter granting Administrative Approval for these two programs through June 30, 2025.

The University submitted yet another proposal on December 22, 2022, seeking Administrative Approval for a Post Graduate Certificate in Psychiatric Mental Health Nurse Practitioner – Primary Care (PG-PMHNP-PC). This certificate program, approved by WASC and accredited by CCNE, is open to those already holding a RN license, and a Master's or Doctoral degree in Nursing from a CCNE or ACEN accredited program. The program, 28 – 37 credit hours in length over 5 or 6 trimesters, includes three practicums totaling 585 clock hours. Syllabi for the practicums were included with the application, as well as other curricular materials and faculty qualifications. Graduates of the program are eligible to sit for national certification examinations in psychiatric mental health practice.

The Director issued a letter granting Administrative Approval for this program through June 30, 2025.

### **University of Southern California (USC): Program Reorganization**

The University informed the Commission on a curricular reorganization of its previously approved Master of Social Work (MSW) program. The changes are designed to offer a more integrated approach to the delivery of the program, and the changes have been approved by the Council for Social Work Education (CWSE). The Director acknowledged the notification and approved of these changes.

### **Post-Master's Certificates:**

None

## International Colleges and Universities:

### **American University of Madaba (AUM):**

#### NECHE Activities:

Upon the approval of The New England Commission of Higher Education (NECHE) in November 2021 to consider AUM Eligible to apply for candidacy and initial accreditation, AUM appointed the Steering committee and subcommittees to respond to the nine standards and prepare the self-study.

Orientation sessions have been conducted to AUM constituencies as part of the preparation process for the self-study. Administrators have attended the international information sessions via Zoom initiated by NECHE for university representatives from all institutions to learn from other institutions that have recently gone through the candidacy process and address their questions regarding writing the candidacy self-study.

Dr. Carol Anderson (Vice President of NECHE) visited the University to provide orientation and guidance on the Self-study process, criteria for candidacy, and other requirements and information about the process and accreditation. The Visit took place in June 2022. Dr. Anderson met with the different constituencies of the University and provided direction on the coming steps. The meetings were with the President, Director of Accreditation and QA, Deans, Chairs of Academic departments, Faculty members, administrative staff, Steering committee, sub-committees, and Assessment Committee, in addition to a tour inside the campus.

Dr. Dennis Hanno, president of Wheaton College, will chair the NECHE candidacy visiting team in the Fall of 2023.

#### Program Approvals:

AUM has proposed a new graduate program, a Master of Business Administration with an emphasis in Business Analytics. This program was reviewed by Dr. Kimberly Bogle Jubinville, Senior VP and Chief Academic Officer at Southern New Hampshire University, and Dr. Tevik Aktekin, Associate Professor of Data Sciences at the University of New Hampshire. The results of that evaluation were presented to the Commission at its October 2022 meeting.

AUM also requested two program changes in its undergraduate programs. First, was a name change in the accounting program from a BA in Accounting to a BA in International Accounting and Finance. This 133 credit-hour program was augmented with several course changes to reflect the regional job market where accounting skills in international and related financial areas are expected for majors in the field. The second was the introduction of a BS in Cybersecurity (134 credit hours) associated with their already approved BS programs in Computer Science and Data Sciences/Artificial Intelligence. Two new faculty will be hired to support this program. These changes were approved by the Jordanian Ministry of Higher Education and Scientific Research, Higher Education Council (MOHE), and the Jordanian Accreditation and Quality Assurance Commission for Higher Education Institutions (AQACHEI).

Given the dual approvals by the Jordanian higher education entities and a review of the submitted materials, the Director granted Administrative Approvals for these two programs from the NH Department of Education, Division of Educator Support and Higher Education through December 31, 2023 to align with all other program approvals. Implementation will be documented in AUM's annual report in March 2023.

### **Hellenic American University (HAU):**

HAU submitted its 5th Year Interim Report to NECHE in September 2022, and hosted an onsite visit by NECHE to its Athens and Nashua, NH campuses in late October 2022. The evaluation report was quite positive and NECHE will act upon the report at its Spring 2023 meeting.

## EDUCATOR PREPARATION PROGRAMS

Submitted by Laura A. Stoneking

The Bureau of Educator Preparation and Higher Education oversees all NH educator preparation program reviews, approvals and ensures that all educator preparation programs meet minimum requirements leading to quality preparation programs that lead to educator licensure. Through the Council for Teacher Education (CTE), representatives coordinate, review and advise the NH State Board of Education of NH PEPPs.

NH has twelve institutions of higher education with offering educator programs that prepare NH educators through approved professional educator preparation programs (PEPPs).	Currently, there are <ul style="list-style-type: none"> <li>• <b>151</b> Fully Approved, and</li> <li>• <b>7</b> Conditionally Approved PEPPs.</li> </ul>
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A full roster of PEPPs can be found at [educator-programs.pdf \(nh.gov\)](https://www.nh.gov/education/cte/educator-preparation-programs.pdf).

Below are some of the activities the CTE has accomplished from September 2022, through January 2023:

NH PRIVATE INSTITUTIONS with APPROVED EDUCATOR PREPARATION PROGRAMS		
<b>Antioch University New England</b>	ALL PEPPS CLOSING Elimination/Extension July 2022	Eliminated Science Teacher (Conditional) for Grades 5-8 effective <b>6/14/2022</b> Elimination of Life Science (Conditional) PEPP through <b>7/27/2023</b> <i>*Technical Assistance with verification, transcripts, and general Ed 600 requirements; transcript corrections for prior non-completers</i>
		<b>*ALL AUNE PEPPs are set to be eliminated 2/27/2023</b>
<b>Franklin Pierce University</b>	CONDITIONAL APPROVAL	Conditional Approval (7) through <b>10/31/2023</b> Priority Progress Report received <b>1/12/2023</b> on unmet standards; currently under review
<b>New England College</b>	FULL APPROVAL	Full Approval (8) PEPPs through <b>8/30/2027</b> <i>*Technical Assistance with Advanced Endorsements; NEW PEPPs at licensure level process (Principal, Superintendent); possible new PEPP proposals anticipated</i>
<b>Rivier University</b>	FULL APPROVAL	Full approval (15) PEPPs through <b>12/30/2026</b>
	SUBSTANTIVE CHANGE	State Board Meeting (January) reinstated licensure only pathway to all 15 PEPPs
<b>Saint Anselm College</b>	NEW REVIEW extended/continued	Option 3 Review (11) PEPPs; new MAT degree; November 14-16, 2022, review extended <i>*Technical Assistance regarding Ed 500 and Ed 600 requirements, PEPP review process; MOU addendum to be completed</i>
	FULL APPROVAL	Full approval (13) undergraduate PEPPs through <b>8/30/2028</b> Full Approval (1) – new Special Education; new M.Ed. through <b>12/31/2024</b>
<b>Southern New Hampshire University</b>	IN PROCESS	Option 4 Review (CAEP Accreditation) request for Initial PEPPs (9); March 27-29, 2023, review scheduled
	IN PROCESS	Option 1 State Review ~ Advanced (Principal, Curriculum Admin, Superintendent) PEPPs review tentative November 2, and 3, 2023
		Full Approval (12) through <b>3/30/2024</b> <i>*Technical Assistance with qualified cooperating practitioners and field placements for advanced degrees/licensures</i>
<b>Upper Valley Educators Institute</b>	NO ACTION FULL APPROVAL	Full Approval (20); licensure only PEPPs through <b>8/30/2029</b>
NH PUBLIC INSTITUTIONS with APPROVED EDUCATOR PREPARATION PROGRAMS		
<b>Granite State College</b>	FULL APPROVAL	Full Approval (12) PEPPs through <b>8/30/2028</b> Full Approval (1) new PEPP (Life Science) through <b>12/31/2025</b> Elimination of (1) PEPP <b>3/31/2024</b>
<b>Keene State College</b>	IN PROCESS @ SBE	Full Approval - (16) <b>KSC</b> PEPPs through <b>2/28/2023</b>
	CAEP REVIEW- APPROVED	Option 4 Review (national accreditation); awaiting State Board Approval Council for the Accreditation of Educator Preparation (CAEP)
<b>NHTI</b>	NO ACTION FULL APPROVAL	Full Approval (11) PEPPs through <b>2/27/2025</b>

<b>Plymouth State College</b>	SUBSTANTIVE CHANGE	Extension of Full Approval (10) PEPPs through <b>3/31/2026</b> Moving up of Full Approval (3) PEPPs through <b>3/31/2026</b> Elimination of (6) PEPPs <b>12/31/2022</b> ; (3) PEPPs <b>12/31/2024</b>
<b>University of New Hampshire</b>	NO ACTION	Full Approval (29) through <b>8/30/2027</b>
		<i>*Technical Assistance with transcript review; licensure requirements; cooperating practitioners and field placements for advanced degrees/licensures</i>

IHE	AUNE	FPU	NEC	RIV	St. A	SNHU	UVEI		GSC	KSC	NHTI	PSU	UNH
<b>FULL approval</b>	--	--	8	15	14	12	20		13	16	11	13	29
<b>CONDITIONAL approval</b>	--	7	--	--	--	--	--		--	--	--	--	--
<i>*elimination</i>	7 conditional	--	4 Full 1 Conditional	--	--	1 Full	--		1 Full	--	--	3 Full	--

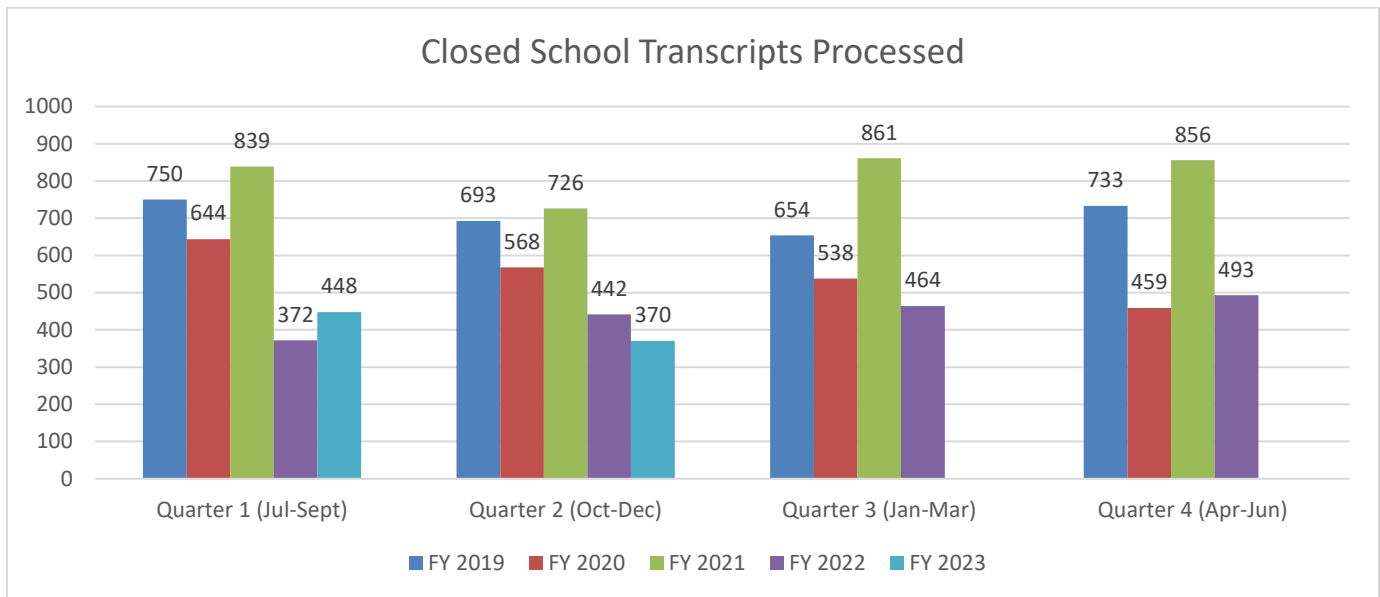
PEPPs are available within a bachelor's degree, master's degree, post-master's degree and/or a licensure only pathway.

Please direct any questions regarding these activities to Laura Stoneking at 603.271.4196 or by e-mail at [Laura.A.Stoneking@doe.nh.gov](mailto:Laura.A.Stoneking@doe.nh.gov).

**CLOSED SCHOOL TRANSCRIPTS**

**Submitted by Pat Moquin**

From July 1, 2022, until December 31, 2022 (FY 2023), 711 college/university and 107 career school transcript requests were processed, generating a total of \$16,360. During the same period in the prior year (FY 2022), a total of 726 college/university and 88 career school transcript requests were processed.



Please note that in FY21, the closed school transcript fee was waived for both career school institutions and college/university institutions.

Please direct any questions regarding these activities to Pat Moquin at (603) 271-0289 or by e-mail at [Patricia.L.Moquin@doe.nh.gov](mailto:Patricia.L.Moquin@doe.nh.gov).



## OFFICE OF CAREER SCHOOLS LICENSING (OCSL)

Submitted by Jeffrey S. Newman

Since the last report in October 2022, OCSL has continued in its duties. Most correspondence between the office and schools has continued to remain virtual via online meetings, phone calls and email. Schools continue to increase in-person learning and few others remain online or hybrid learning models.

We are working with the career schools to have regular site visits to establish a more personable relationship. Some of the schools are still navigating how to merge back into their “old models” of in-person to the “new models” of online learning. Many have been able to find a new business model and report being able to provide both models to meet the needs of many more students. Some are starting to look more closely at the bill that was signed by the Governor, SB148, specifically Part IV, that went into effect October 9, 2021. This new exemption has been added to RSA 188-G:1, II (m) Entities that have annual gross tuition of \$100,000 or less. As a result, several schools falling into this category have already withdrawn, while others have opted to remain licensed, as certain tuition programs rely on being licensed.

Schools currently licensed: 48

### Recent Visit Activity

Beginning in December, we have so far conducted 16 site visits to schools. We are currently pending a dozen more. We can report that all of the schools visited to date are energetic locations and that their educators are passionate about teaching their trades.

### Recent Exemption Approvals/Pending.

- Nashua Adult Learning Center, Inc.

### Non-Licensed Career Schools Seeking Exemption:

- Northwest Phlebotomy School (pending)

### Recent Career School Closures/Pending:

- None currently

### Recent Career School seeking a license:

- None currently

Below are some of the other activities that were conducted by the OCSL team since the last Commission meeting in October 2022.

### Renewed the licenses and license continuance of the following schools:

- |   |  |
|---|--|
| ○ ONLC Training Centers                     | ○ All Dogs Academy 505                     |
| ○ HRFoodSafe                                | ○ Heavy Construction Academy               |
| ○ Advanced Technical School                 | ○ American Academy of Health and Beauty    |
| ○ PESI                                      | ○ Trivium Institute for Leader Development |
| ○ NH School of Mechanical Trades            | ○ United Training Academy                  |
| ○ American Professional Education Institute | ○ Sharing Yoga                             |

### Currently reviewing license renewal/annual filing applications for the following schools:

- |                 |  |
|-----------------|--|
| ○ Misty Meadows | ○ Northeast Dental Collaborative school for Dental Assisting |
| ○ Visible Edge  |  |

### Upcoming Annual/Renewals:

- |                     |                        |
|---------------------|------------------------|
| ○ Prelude Institute | ○ Unique System Skills |
|---------------------|------------------------|

- Medical Gas Credentialing, LLC
- Sig Sauer Academy
- Phlebotomy Training Specialist
- Radiation Safety and Control
- Animal Behavior College
- Boston Bartender School of America
- CALCampus
- Cross Cultural Communication Institute
- EPTAC
- FLIR Infrared Training Center
- Hyslop & Associates
- John Mason Institute
- NBI, Inc
- New Hampshire Institute for Therapeutic Arts
- North Eastern Institute of Whole Health, Inc
- Holistic Academy of Natural Disciplines
- XLOS Education Center

New School Applications:

- Primal Instinct Body Piercing School

Completed/Pending the closure of the following schools:

- None currently

Please direct any questions regarding these activities to Jeffrey Newman at (603) 271-8508 or by e-mail at [Jeffrey.Newman@doe.nh.gov](mailto:Jeffrey.Newman@doe.nh.gov).

**NH Department of Education  
Division of Educator Support and Higher Education  
Higher Education Commission**

**October 11, 2022: Commission Meeting**  
**[2023-2024 Commission Meeting Dates](#)**

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<b>2023-2024 Commission Meeting Dates:</b>			
<b>Date:</b>	<b>Day:</b>	<b>Time:</b>	<b>Location:</b>
February 14, 2023	Tuesday	2:00pm	25 Hall St. Concord, NH 03301
May 9, 2023	Tuesday	2:00pm	25 Hall St. Concord, NH 03301
October 10, 2023	Tuesday	2:00pm	25 Hall St. Concord, NH 03301
February 13, 2024	Tuesday	2:00pm	TBD
May 7, 2024	Tuesday	2:00pm	TBD
October 15, 2024	Tuesday	2:00pm	TBD

**Link to Prior Meetings:** [HIGHER ED COMMISSION MTGS, MINS, and AGENDAS](#)