

State Board of Education

Rule 2243.3

Renewal of Certification

Cassandra Ryan, Director of Regulatory Compliance
cassandra.ryan@vermont.gov

SBE Postsecondary Approvals

- Two types of Approval:
 - Certificate of Approval to offer credit-bearing courses.
 - Degree Granting Authority
- Different processes/requirements for:
 - Chartered in Vermont
 - Chartered outside Vermont

Credit Bearing Review

- Secretary determines a team to review the application, may include a site visit.
- Team makes recommendation to the Secretary.
- Secretary makes recommendation to SBE.

Degree Granting Authority Review

- For Postsecondary applicants seeking Degree Granting Authority (In-state or Out-of-State), Title 16 §176(h) requires that the Board obtain the advice of VHEC.
- This is done through a contract administered by the AOE.
- VHEC secures expertise appropriate to the applicant and conducts a thorough review.
- VHEC submits a report to the Secretary with a recommendation on approval / denial and if approval, term length.
- Secretary recommendation goes to SBE.

Approval Term

- SBE may grant Certificate of Approval and/or Degree Granting Authority approval for a period of time not to exceed **five (5) years** per Title 16 §176(e) and SBE Rule 2243.7

Renewal for Out-of-State PS

- Annual Registration Process due Sept 1st
 - Requires continued approval in home state
 - Evidence of continued accreditation status with a USED recognized accreditor
 - \$1,000 first year
 - \$500/year after
- There is no renewal process beyond the annual registration process for out-of-state PS

Renewal for Chartered in VT

- The rule requires that the PS secure accreditation status with a USED recognized accreditor during the timeframe of its initial approval period.
- The PS cannot seek renewal without this accreditation.
- Three schools (approved prior to this rule) were grandfathered from this requirement: The Center for Cartoon Studies, NEBC, and OPLERNO (OPLERNO is now out of business).

Complications of Renewal Accreditation Requirement

- Most accreditors will not accept application from a PS until the PS has been in operation for 2-5 years.
- For example, the New England Commission of Higher Education (NECHE) requires the PS to have graduated its first class before it can be considered. NECHE estimates a “fast track” accreditation would be six (6) years.
- The initial approval period is one - five years.

VHEC

- Vermont Higher Education Council (VHEC) has expressed concerns that SBE Rule 2243.3 limits the VHEC review team's ability to offer a recommendation of less than five (5) years.
 - Letter to SBE October 29, 2018
 - Resent November 8, 2019
- In many cases it may be appropriate to recommend less than a 5-year initial approval

Others

- Individuals/entities interested in opening a PS in Vermont do not pursue the application process due to this requirement. - There have been no initial applications approved since this rule became effective.

Possible Revisions

- Eliminate the requirement for accreditation prior to initial renewal
- Include a rule that requires a PS to be fully accredited within 10 years.
- Continue grandfathering the now two (2) already approved PS per the above.
- VHEC offered a willingness to assist with ideas.

Proposed Amendment

A school seeking renewal of certification shall apply in writing to the Secretary no later than six months prior to the end of any period of certification. Where appropriate, the school may incorporate by reference its prior application or any portion thereof. Certification of a school completing timely application shall extend until the State Board acts on further certification. **Any school seeking renewal, that has obtained initial approval to offer or operate a program of college or professional education for credit or degree, on or after January 1, 2015, shall obtain accreditation from an accrediting entity recognized by the US Department of Education, ~~in order to be considered eligible for renewal by the State Board~~ within the first 10 years of operation.**