



May 6, 2021

To: John Carroll, Chair, VT State Board of Education  
From: Troy McBride, Executive Director, Greenway College  
Re: 2240 process for approval of post secondary institutions

Dear Mr. Carroll:

Twenty years ago (in my last year as a graduate student), I developed a vision for Greenway College -- a four-year college with a novel engineering educational program, campus as a living laboratory for engineering our sustainable future, and focused on sustainable engineering and technology. With the current world events and educational crisis, the time is ripe for launching this new institution. We are designing from the outset to earn accreditation from ABET's Engineering Accreditation Commission (EAC). We will also secure regional accreditation for the institution as a whole. I would be happy to come to a board meeting to discuss our plans and work to date.

I am writing to call to your attention what I believe may be **an inadvertent problem in the Vermont rules and timeline for approval of post-secondary institutions**. In particular, Vermont's current rules provide an unreasonably short time period including an external accreditation requirement between initial approval to operate and renewal. This short time period puts undue and unnecessary risk on new institutions, which discourages any new applications within Vermont. This **Vermont rule for post-secondary approval has a timeline that may inadvertently be out of line with the timeline of accreditation review**, which makes Vermont more difficult and highly risky as a potential location to start a new sustainable engineering college.

This November 2019 communication from Rich Schneider, the former Chair of the Vermont Higher Education Council Certification Committee, outlines the problem and one proposed solution to this problem: [https://education.vermont.gov/sites/aoe/files/documents/edu-state-board-item-h-11\\_20\\_19.pdf](https://education.vermont.gov/sites/aoe/files/documents/edu-state-board-item-h-11_20_19.pdf). This letter was a revision of an October 2018 memo from VHEC to the Board on the same issue.

The issue is connected to the requirement that any new college **must** receive accreditation from a regional or national, recognized accrediting entity like NECHE in order to be considered for re-approval. While achieving regional or national accreditation within five years seems on the surface to be a reasonable goal, having it as a hard requirement introduces unreasonable risk and discourages starting the process within Vermont. Indeed, five years is a very narrow window as I discuss on the next page.

Specifically, Section 2243.3 of the Board's Rules for Certification of Postsecondary Schools states: *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.*



# GREENWAY COLLEGE

This leads to two issues:

1. A robust accreditation processes typically take five years and can't begin in earnest until an institution has opened (perhaps a year after initial approval, to facilitate recruitment of students). Assuming one year to start and a four-year degree program, the first graduates are barely graduating from the college within the five year window. **As a founder, this makes Vermont's inflexible five-year accreditation requirement an unacceptably risky and unlikely place to launch a college.**

2. VHEC states *"new institutions seeking certification be reviewed again in two or three years in order to ensure that the schools have maintained their ability to meet standards. We believe this provides institutions with a reasonable time frame to address potential issues and enables them to benefit from the experience of the reviewers on the Certification Committee as they move towards accreditation."* As a new institution, Greenway College could benefit from this tighter oversight and feedback loop during the years of launch, and would support more frequent review to meet the state's concern for protecting the interests of students during an initial launch. **However, with a short approval frame, it is not possible to complete a robust, federally-recognized accreditation process in time to be renewed under the current rules.**

We are aware that you are reviewing and revising the 2200 series of rules, and respectfully ask that you to consider revising the 2240 rules to make renewal as a college in Vermont contingent on being in good standing in a robust, nationally-recognized accreditation process.

We recommend the following revision to the rules as written (bolded text is new).

*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, **except that Vermont renewal will be considered so long as the institution is on track towards accreditation from a regional or national accreditation entity recognized by the US Department of Education.***

Thank you for your time and consideration.

Best regards,

Troy McBride  
Executive Director, Greenway College