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Comprehensive Review Process Updates

Coordinating Board for Higher Education
June 15, 2022

BACKGROUND

The process for the comprehensive review of new academic programs that fall outside the parameters of routine and staff review was approved by the Coordinating Board in 2017 and established by rule in 2018. The rule codifies the timeframe in which proposals may be submitted for comprehensive review while CBHE policy establishes the maximum number of proposals that may be considered each year. This item updates the Coordinating Board on the current status of the comprehensive review process and seeks approval from the CBHE to work with institutions outside the current prescribed boundaries as the administrative rule undergoes review and revision.

At the June 2017 CBHE meeting, staff recommended, and the CBHE approved, no more than three proposals for comprehensive review would be considered in total for the first year of the framework and no more than five proposals in total would be considered in the second and subsequent years. Of these five, no more than three proposals may come from either public universities or public two-year institutions.

The comprehensive review process, further outlined at the June 2018 CBHE meeting, requires institutions to submit preliminary (Phase I) proposals for consideration no later than July 1 for review by department staff. The CBHE evaluates the proposal at the September meeting and determines if the proposal should be considered for a full review. Institutions then work with the department to submit a complete proposal (Phase II) in which the CBHE takes action usually at the February/March meeting.

CURRENT STATUS

The timeline and maximum proposal guidelines as agreed upon by institutions, the department, and the CBHE appeared appropriate at the outset. However, issues and concerns have been raised regarding the process since its implementation.

1. Overall process length. The comprehensive review timeline was originally a minimum of seven months (July – February) from initial submission to CBHE approval. Institutions note that such a lengthy process may negatively impact the ability of Missouri's public institutions to meet local, regional, and statewide needs.
2. Reduced turnaround time for materials. The department maintains a publication deadline for items to be included in upcoming CBHE meetings. It has been challenging for staff to review and provide feedback on submissions in order for institutions to submit revised proposals by the publication deadline. This timeframe is additionally restricted due to the administrative rule requiring a 20 day public comment period for both Phase I and Phase II submissions, after which comments are provided to the submitting institution for consideration and response.
3. Limitations on the number of proposals. Concerns were raised that limiting the number of proposals in the manner prescribed at the June 2017 CBHE meeting would artificially restrict institutions from proposing needed programming for a year or more, further challenging institutions to meet student and workforce needs.
4. Routine review proposals determined to require comprehensive review. Routine program proposals are received, posted for public comment, and reviewed monthly, with a decision rendered by the Commissioner typically at the end of the month. The department may require an institution to submit a proposal through comprehensive review if staff determines the proposal does not meet routine criteria.

Staff are considering how such a process would be implemented as this determination could occur in any monthly review and therefore may not match the comprehensive review timeline.

The department and institutions have worked diligently over the last several years to streamline the comprehensive review process and potentially reduce the challenges related to process length and turnaround time for proposals. The department has developed an online portal to allow institutions to submit proposals, supporting documents, and responses to public comments in one location. Additionally, the department has prepared detailed forms and checklists to assist institutions in ensuring the appropriate documentation is submitted during the correct phase of the process. Finally, when the department is notified of an institution's intent to submit a proposal for comprehensive review, staff schedule monthly meetings to answer questions and provide feedback at all phases of the review; these meetings continue until a final decision is made on the proposal.

The department is committed to continuous improvement of the comprehensive review process. Staff plan to initiate a detailed review of the current administrative rule in collaboration with institutions and present the CBHE with a proposed amendment to the rule in FY 2023.

RECOMMENDATION

Staff recommend the Coordinating Board authorize the department to accept proposals for comprehensive review on a rolling basis and work with institutions to meet the requirements of Phase I and Phase II proposals as soon as possible.

Additionally, staff recommend the Coordinating Board authorize staff to accept comprehensive reviews without limitation to number received in a year, except the department may prioritize proposals based on staff resources.

NO ATTACHMENTS