

Tab 14

Missouri State University Proposal to Change CBHE-Approved Mission Description

Coordinating Board for Higher Education
December 8, 2021

BACKGROUND

Section 173.030(8), RSMo, describes the framework used by the Missouri Department of Higher Education & Workforce Development for the mission review cycle. As part of the process, institutions and staff draft a description of the institution's mission, audiences served, types of degrees offered, and other distinguishing factors. The CBHE-approved mission description serves an important role in the review of proposals for new academic programs. As a consequence, any change to components in the description must be approved by the CBHE.

CURRENT STATUS

Missouri State University's current mission description was approved by the CBHE in March 2019. The description includes each doctoral program offered by the institution at the time of approval. Subsequent to that approval, MSU has increased the number and type of professional doctorates offered and the number of students enrolling in its doctoral programs has also grown. These changes, as well as changes to the institution's classification with the Carnegie Commission on Higher Education and the Integrated Postsecondary Education Data Systems (IPEDS), prompted MSU to seek a change to its mission description (Attachment A).

The Department posted the request for public comment on September 23, 2021. The proposal received one combined comment from the Missouri University of Science & Technology, the University of Missouri-Kansas City, the University of Missouri-St. Louis (Attachment B). The comment suggested:

- The comprehensive review process already provides a pathway for MSU to offer professional doctorates making a mission description change unnecessary;
- Without requiring professional doctoral programs to undergo comprehensive review, future programs could be approved under a less rigorous process; and
- Comprehensive reviews prevent oversaturation of the doctoral market.

MSU provided the department with its response to the comment, explaining:

- Updating the mission description now will prevent future mission change requests as MSU offers and receives approval for additional professional programs;
- Professional programs not named in statute may be offered by institutions upon CBHE approval;
- MSU must still undergo the routine review process with the department; and
- MSU's doctoral programs have employment rates of 92-100%, supporting workforce needs.

Based on the comment and discussion with DHEWD staff, MSU revised its proposed description change to indicate the institution does not offer first professional degrees.

RECOMMENDATION

Staff recommend the Coordinating Board approve a revised mission description for Missouri State University as proposed in Attachment A.

ATTACHMENTS

- A. Missouri State University Proposal to Change CBHE-Approved Mission Description
- B. Public Comment (S&T, UMKC, UMSL), 10/8/21
- C. MSU Response to Public Comment, 10/25/21
- D. Public Feedback Outside of the Comment Period

Tab 14 Attachment A
MSU Proposal to Change CBHE-Approved Mission Description

Missouri State University - Proposal to Change CBHE-Approved Mission Description

Public colleges and universities are encouraged to review and ask questions or make comments on this request, which is posted on the [Department website](#). The deadline to submit comments on the proposal is **Monday, October 18, 2021**. Please submit comments to Dr. Laura Vedenhaupt at laura.vedenhaupt@dhewd.mo.gov. Any comments submitted during the comment period will be shared with the institution to assist in formulating revisions as needed. An updated proposal will be reviewed by staff and a recommendation will be made to the Coordinating Board at the next available meeting.

Missouri State University (MSU) submitted a request to update its [CBHE-Approved Mission Description](#). The current description for MSU, as approved at the conclusion of the last five-year mission statement review cycle, indicates the institution is a comprehensive university that offers baccalaureate and master's degrees with professional doctorate degrees in audiology, physical therapy, nursing practice, and nurse anesthesia. MSU has requested a change to its approved mission description to include "professional doctorates" without limitation to the above fields:

| | |
|---|--|
|  | <p>MISSOURI STATE UNIVERSITY BOARD-APPROVED MISSION Missouri State University is a comprehensive institution offering undergraduate and graduate programs, including the professional doctorate. The university educates students to be global citizen scholars committed to public affairs.</p> |
| <p>CBHE-APPROVED MISSION DESCRIPTION</p> | |
| <p>Missouri State University, located in Springfield, is a comprehensive university with a statewide mission in public affairs. Missouri State University is designated as a selective institution.</p> | |
| <p>Missouri State University serves the state by offering baccalaureate, master's, and professional doctoral degrees in the arts and humanities, teacher education, agriculture, and the natural, health and social sciences appropriate to a teaching institution with a predominately undergraduate student body and a broad range of master's and professional programs. Missouri State University does not offer first-professional degrees as defined in 6 CSR 10-4.010(9)(C)(3). Missouri State University has particular strengths in business-related fields, agriculture, teacher education, environmental sciences and allied health disciplines.</p> | |
| <p>Missouri State University also fulfills its mission by offering services to promote and sustain economic development, small business development, and workforce development, in addition to a broad range of academic and cultural activities and events.</p> | |
| <p>Consistent with the provisions of 173.030(8) RSMo, Missouri State University every five years will provide to the Coordinating Board evidence of fulfilling its CBHE-approved mission description.</p> | |

Applicable Regulations:

[Section 173.030\(8\)](#), RSMo, provides institutions the opportunity every five years to develop a mission description in conjunction with the Department of Higher Education and Workforce Development (DHEWD) for review and approval by the Coordinating Board for Higher Education (CBHE). This statutory section also allows institutions to request a description change outside of the mission review process.

[Section 174.160](#), RSMo, grants public universities the “power and authority to confer upon students, by diploma under the common seal, such degrees as are usually granted by such colleges...”

[6 CSR 10-4.010 \(1\)](#) defines a CBHE-approved mission as “a description of the public institution’s programs, audiences served, level and type of degrees offered, or other distinguishing factors, which the CBHE has reviewed and approved.”

The administrative rule provides no framework for reviewing the mission description outside the five-year cycle. As the CBHE-approved mission description is a critical component used by DHEWD to facilitate its review of new academic programs and program changes, the following factors should be considered for an out-of-cycle mission description review:

1. Programs
2. Audiences served
3. Level and types of degrees offered
4. Other distinguishing factors

Department staff requested additional information from MSU in the above categories. The following information was provided:

1. Programs

MSU has proven its ability to propose and receive approval for doctoral programs, including those outside of its CBHE-approved mission description. As a result, the institution now offers the following doctoral level programs:

- Doctor of Nurse Anesthesia Practice
- Doctor of Audiology
- Doctor of Nursing Practice
- Doctor of Physical Therapy
- Doctor of Defense and Strategic Studies

MSU is currently engaged in the comprehensive review process for a Doctor of Occupational Therapy, which the CBHE approved to move to Phase II at its September 15, 2021 meeting. Should the proposal receive approval at the completion of Phase II, this would add a sixth professional doctorate to MSU’s inventory of degree programs.

As of the date of this posting, MSU has conferred over 1,000 doctoral degrees in multiple professional fields.

II. Audiences Served

a. Enrollment in MSU doctoral programs compared to masters

Enrollment in master’s degree programs at Missouri State has risen steadily during the past two decades. Table 1 shows student annual fiscal-year enrollment in master’s and doctoral programs for the past eleven years.

There is a 31% cumulative increase in master’s enrollment over the period of 2011 to 2021 (Table 1). By comparison, doctoral enrollment has been characterized by a much steeper increase, tripling over this same time. When the first doctoral program was launched in 2002, doctoral students comprised less than 1% of MSU’s total number of degree-seeking graduate students. That portion rose to 5% in 2011, 10% in 2015, and has been between 12% and 14% since 2016.

These data illustrate that the increase in MSU’s doctoral enrollment has outpaced the increases in master’s degree enrollment, resulting in higher percentages of doctoral students in the total graduate enrollment at MSU. This trend is expected to continue for the next few years as MSU adds additional doctoral degrees to meet workforce expectations in fields where terminally qualified individuals will be needed.

Table 1. Student annual headcount enrollment in doctoral and master’s programs (annual counts are the sum of enrollment in the three semesters—summer, fall, and spring).

| Program | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|--------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Doctoral | 33 2 | 38 4 | 39 1 | 44 7 | 55 3 | 73 9 | 95 1 | 1,0 41 | 1,0 46 | 1,0 20 | 1,0 86 |
| Masters | 6,6 57 | 6,2 40 | 6,4 59 | 6,6 80 | 6,8 28 | 6,6 95 | 6,4 89 | 6,4 22 | 6,8 85 | 7,1 86 | 7,8 75 |
| Total Masters & Doctoral | 6,9 89 | 6,6 24 | 6,8 50 | 7,1 27 | 7,3 81 | 7,4 34 | 7,4 40 | 7,4 63 | 7,9 31 | 8,2 06 | 8,9 61 |
| Percent Doctoral | 5% | 6% | 6% | 6% | 7% | 10% | 13% | 14% | 13% | 12% | 12% |

b. Demographics of MSU’s doctoral and master’s students

Demographic characteristics of students enrolled in MSU’s master’s programs were compared to those in MSU’s doctoral programs, and the averages for the past 6 years (2015 to 2021) are shown graphically in the Appendix, Figures 1 through 4.

Caucasian students are the majority in both degree categories. However, there is a relatively greater proportion of domestic historically underrepresented students at the doctoral level at

MSU. The doctoral-student population contained a very small component of non-resident alien students compared to the 15% found at the master's level (Appendix, Figure 1).

Essentially half of the students at both levels are between 25 and 39 years old, but a higher percentage of master's students are over 40 (Appendix, Figure 2).

The gender distribution shows a much higher component of female students in both degree levels (Appendix, Figure 3). However, 67% of MSU's doctoral students are female compared to 61% of MSU's master's candidates. This suggests that MSU's doctorate programs provide more robust opportunities for education and career attainment of females in these disciplines.

Finally, demographic comparisons indicate that a higher percentage of doctoral students (76%) enroll full-time when compared to master's students (46%) (Appendix, Figure 4).

III. LEVEL AND TYPES OF DEGREES OFFERED

The first professional doctorate offered by MSU was the Doctor of Audiology, approved in 2002 (Table 2).

Community needs in health care were a driving force for initiation of the next several professional doctorate degrees. The health-care service industry had a strong demand for personnel educated to the level of doctoral qualifications. The community demand continues to exist, particularly in rural settings. Graduates from these MSU programs have readily entered the workforce with a strong percentage of them accepting employment in Missouri or in the Midwest.

Table 2. History of doctoral degree programs offered by Missouri State University.

| Professional Doctoral Degrees Offered by MSU | Year of Program Initiation | Fiscal Year of First Graduates | Number of Graduates Since Inception |
|---|-----------------------------------|---------------------------------------|--|
| Doctorate of Audiology (AuD) | 2002 | 2006 | 147 |
| Doctor of Physical Therapy (DPT) | 2005 | 2008 | 458 |
| Doctor of Nursing Practice (DNP) | 2012 | 2015 | 107 |
| Doctor of Nurse Anesthesia Practice (DNAP) | 2014 | 2016 | 292 |
| Doctor of Defense & Strategic Studies (DDSS) | 2020 | | |

Prior to offering the Doctorate of Audiology, MSU collaborated with the University of Missouri-Columbia (UM-C) to provide a Doctor of Educational Leadership (Ed.D.) for students in southwest Missouri. This Ed.D. was granted by MU-C with MSU providing the major teaching responsibilities for students in the MSU cohorts. Similarly, MSU entered a collaboration

arrangement with the University of Missouri at Kansas City to offer the Doctor of Pharmacy (PharmD) on the MSU campus. The first class of those pharmacy students started in 2014.

As shown, over the past two decades MSU has added to the programs offered at the doctoral level (Table 2). The number of degrees conferred annually has regularly increased, reaching a total of 149 in 2021 (Table 3). The total number of MSU doctorates awarded has now passed the 1,000 mark and the annual number of awards conferred has increased. That annual number will increase further as students in the DDSS program proceed toward graduation and additional doctoral programs are added.

Table 3. Annual number of doctoral degrees awarded for each doctorate offered by MSU.

| Program | Degrees Awarded by Fiscal Year | | | | | | | | | | | | | | | | Total | |
|-----------------------------------|--------------------------------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|-------|--------------|
| | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | | 2022* |
| D. of Audiology | 3 | 8 | 7 | 6 | 8 | 7 | 11 | 13 | 8 | 10 | 14 | 11 | 7 | 10 | 10 | 13 | 1 | 147 |
| D. of Physical Therapy | | | 24 | 23 | 18 | 20 | 35 | 34 | 32 | 32 | 45 | 40 | 38 | 39 | 38 | 40 | | 458 |
| D. of Nursing Practice | | | | | | | | | | 3 | 7 | 13 | 14 | 22 | 17 | 31 | | 107 |
| D. of Nurse Anesthesia Practice | | | | | | | | | | | 13 | 33 | 51 | 61 | 56 | 65 | 13 | 292 |
| D. of Defense & Strategic Studies | | | | | | | | | | | | | | | | | | |
| Total | 3 | 8 | 31 | 29 | 26 | 27 | 46 | 47 | 40 | 45 | 79 | 97 | 110 | 132 | 121 | 149 | 14 | 1,004 |

*FY 2022 data are ongoing

IV. OTHER DISTINGUISHING FACTORS

a. Carnegie Classification

The Carnegie Commission on Higher Education is a classification system for higher education institutions that has become the standard for research and policy analysis. For the past 50 years this classification has been used to identify the roles of institutions within the overall framework of postsecondary education.

MSU's Carnegie Classification was updated in early 2019 from "Master's Colleges and Universities" to "Doctoral/Professional Universities." The Doctoral/Professional classification is defined as an institution reporting less than \$5 million in research expenditures and conferring 30 or more professional practice doctoral degrees in at least two programs.

b. IPEDs

Title IV institutions report data to the Integrated Postsecondary Education Data System (IPEDS). Institutions are grouped into categories. One such category is for the type of outcome awards.

The highest outcome award noted under MSU's IPEDS data is "Doctor's degree – professional practice." This is based on the revised IPEDS award levels that occurred in fall 2010. Those revisions eliminated the "first-professional degree" category and divided doctoral programs into three categories: Doctor's degree-research/scholarship, Doctor's degree-professional practice, and Doctor's degree-Other.

APPENDIX

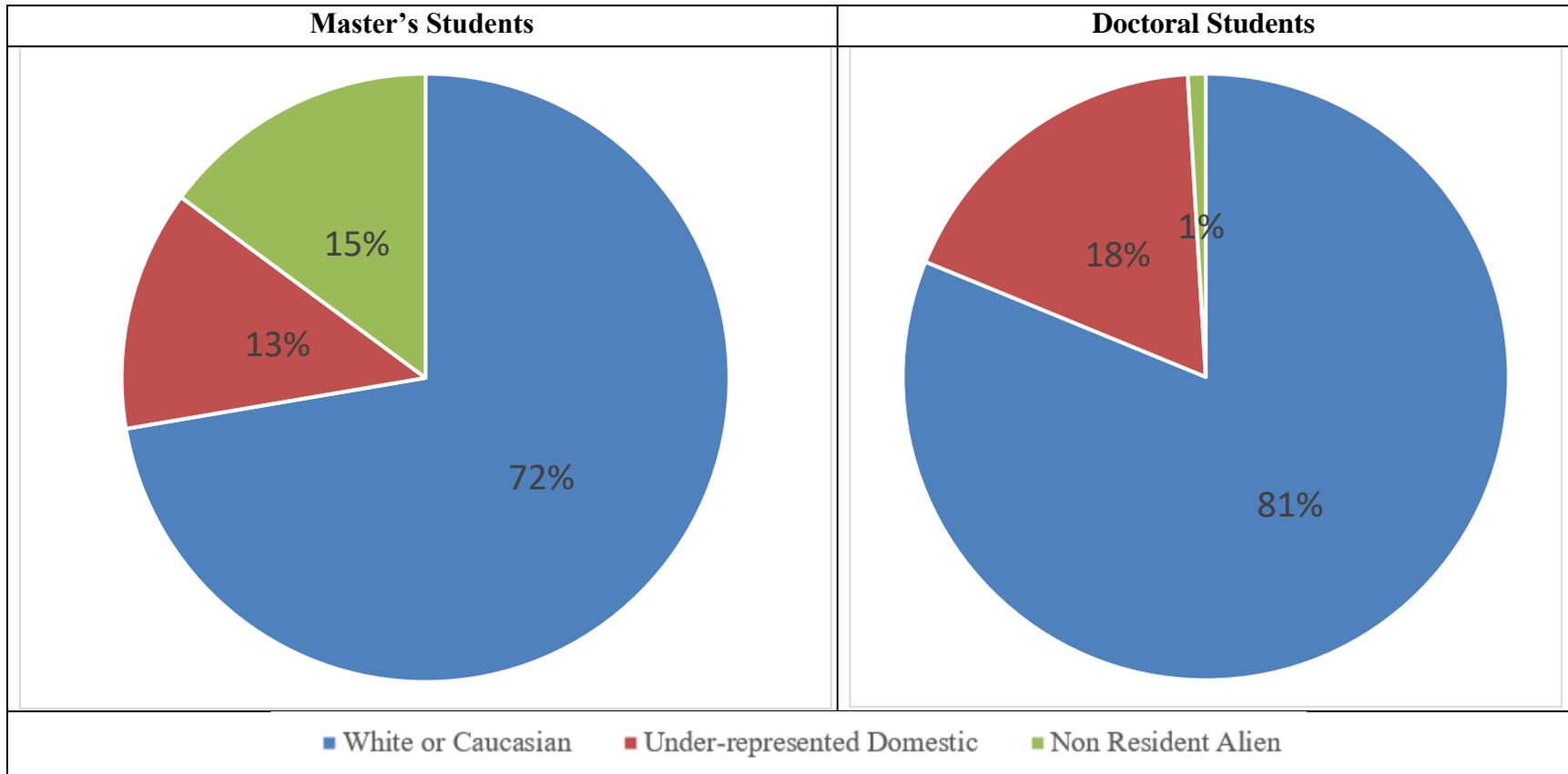


Figure 1. Race-ethnicity of master's and doctoral students over the period 2015 to 2021.

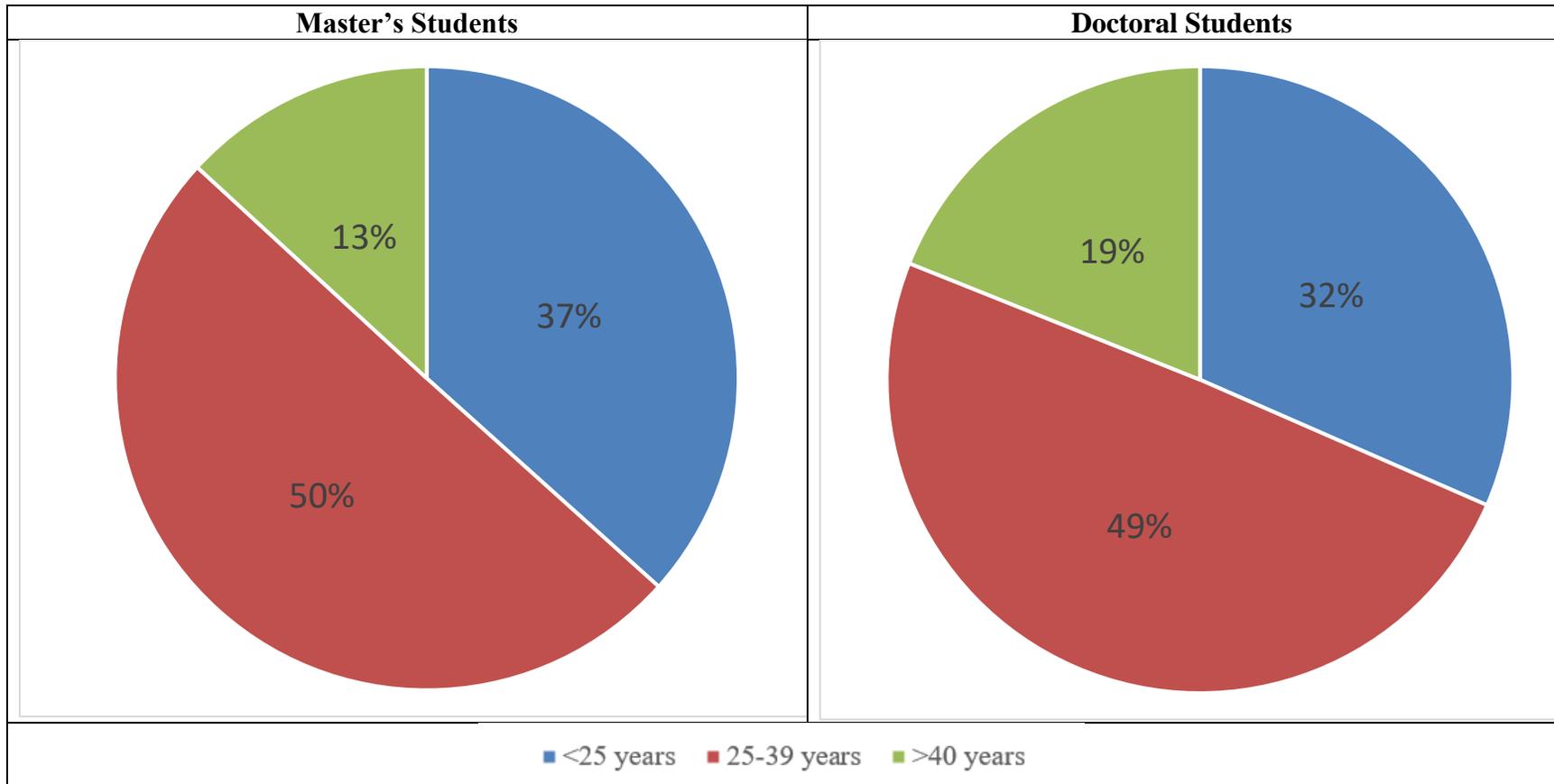


Figure 2. Age of master's and doctoral students over the period 2015 to 2021.

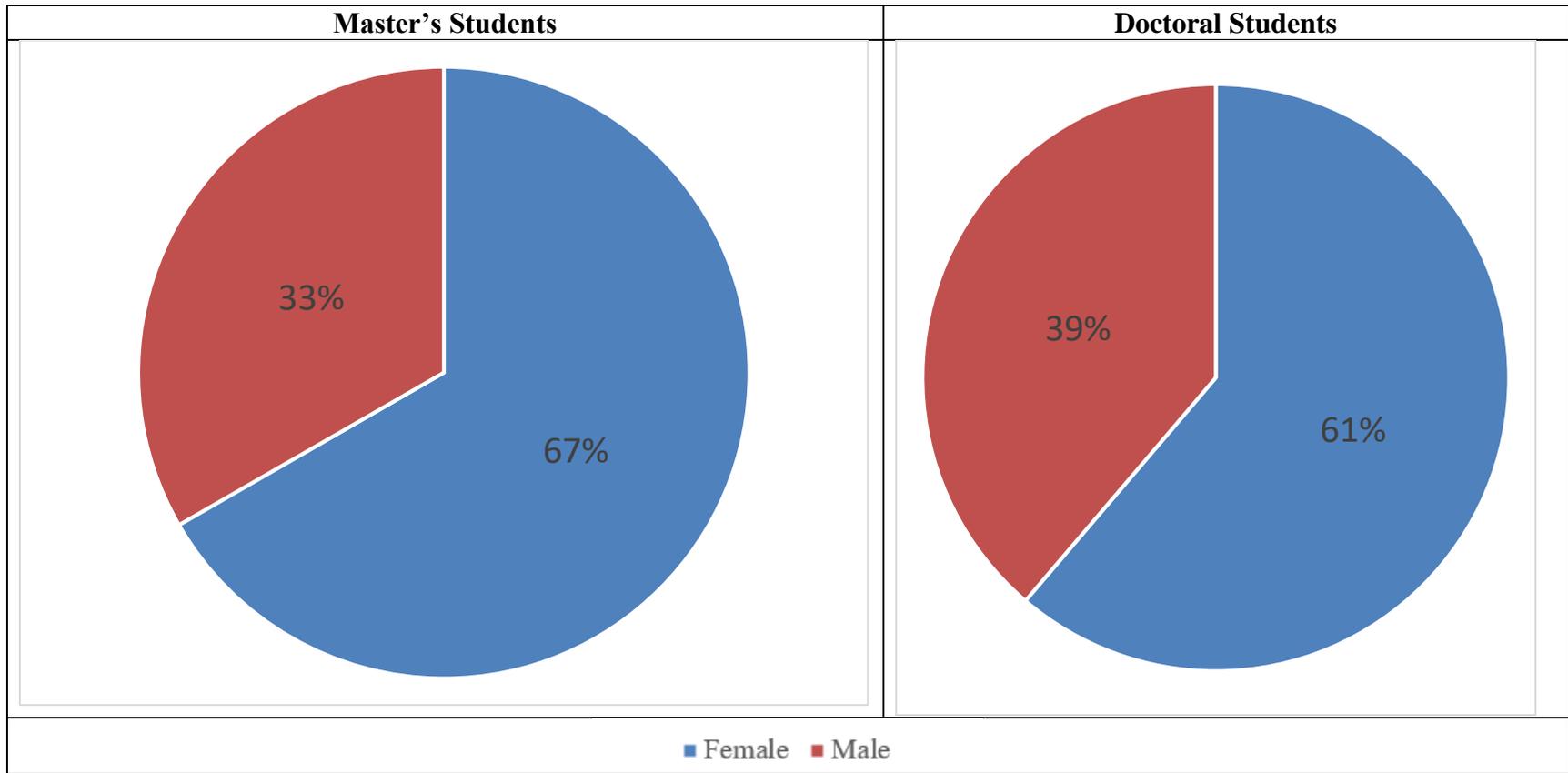


Figure 3. Gender of master's and doctoral students over the period 2015 to 2021.

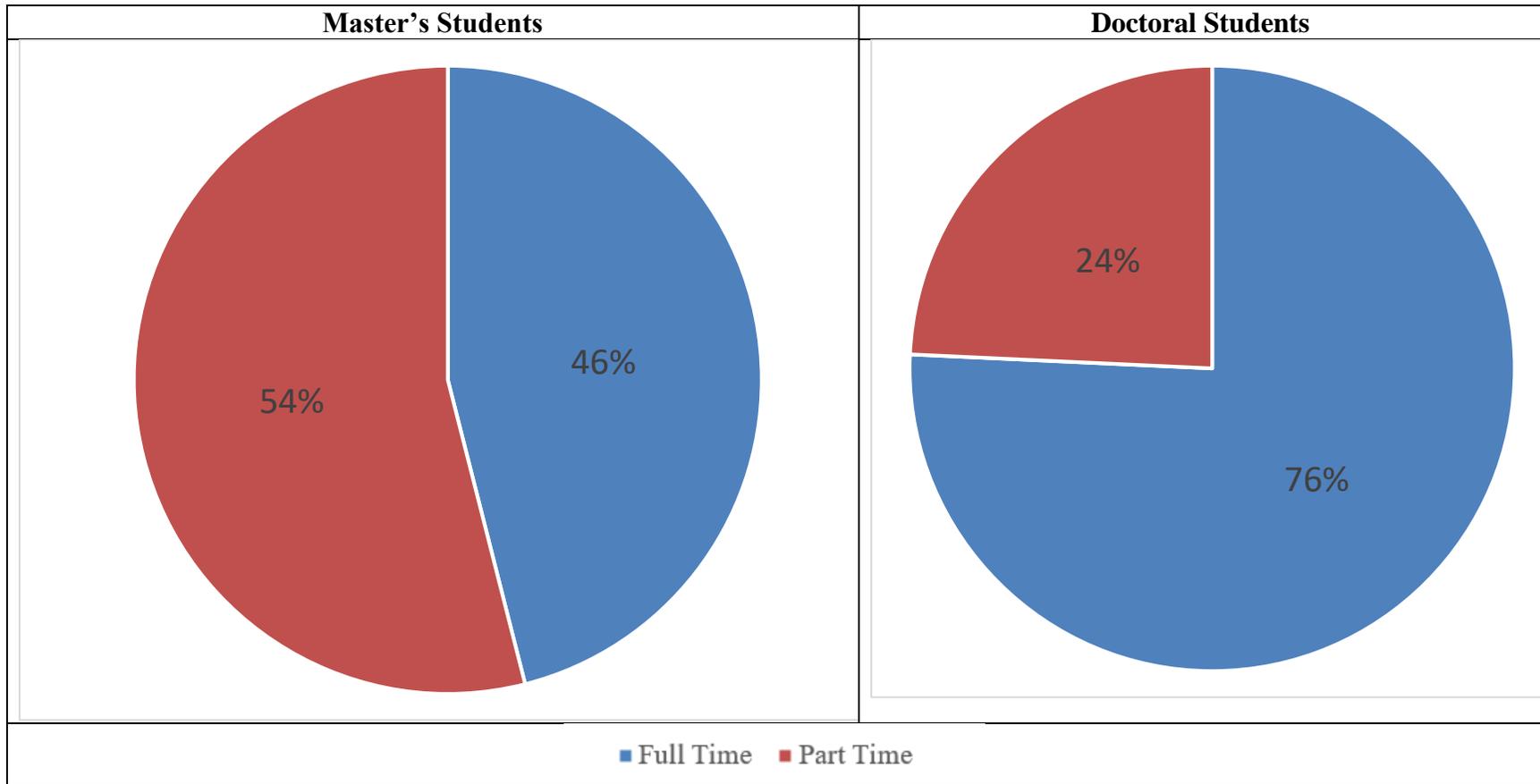


Figure 4. Enrollment status of master’s and doctoral students over the period 2015 to 2021.

Tab 14 Attachment B
Public Comment

October 8, 2021



Mara Woody, Ed.D.
Assistant Commissioner for Postsecondary Policy
Missouri Department of Higher Education and Workforce Development
301 W. High Street
Jefferson City, MO 65201-1469

Dear Dr. Woody,

Thank you for the opportunity to comment on Missouri State University's (MSU's) request to modify its CBHE-Approved Mission Description to include professional doctorates without limitation to the areas of audiology, physical therapy, nursing practice, and nurse anesthesia. Our universities have questions about the need for this change and whether it is in the best interest of higher education in our state.

We believe that the current process, by which MSU must go through the Comprehensive Review process to offer professional doctorates outside of its mission, works well and does not need to be modified. This process strikes the appropriate balance between being too restrictive and not restrictive enough. It would be too restrictive, for example, if MSU had no realistic pathway to offering professional doctorates outside its mission, even when there are compelling reasons for it to do so. This is clearly not the case, as there is a realistic and proven pathway for MSU to do so. MSU's proposal for a professional Doctorate in Defense and Strategic Studies was approved in March 2020, and its still-pending proposal for a professional Doctor of Occupational Therapy is headed toward likely approval in the coming months.

As Missouri's premier public research and doctoral-level institutions, we support efforts by other four-year institutions to offer professional doctorates in areas where it makes sense for them to do so. In fact, our institutions publicly supported both of MSU's prior requests to offer professional doctorates outside its mission. In the case of strategic studies, our institutions had no intention of offering a professional doctorate in the field and were not able to meaningfully collaborate with MSU. Regarding occupational therapy, we supported MSU's proposal because it demonstrated a clear and compelling workforce need, despite the fact that the UM System offers an existing high-quality doctoral-level occupational therapy program. It is conceivable that we would support more such proposals with similar qualities – compelling unmet workforce need, non-duplication, and capacity to offer the program – in the future.

However, our universities do not support a carte blanche approach that would authorize MSU to offer professional doctorates in any field, without the rigorous

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review required by the new-and-improved Comprehensive Review process. This process is important for ensuring that the criteria above have been met, and essential to ensuring that we do not oversaturate the market for doctoral-level programs in our state. While non-duplication is always a worthy consideration in a resource-limited environment, it is particularly important regarding doctoral-level education. Professional programs can be 2.5 to 6 times more expensive to teach than the average cost for bachelor's degree programs, due to smaller class sizes, increased research activity, more faculty-intensive instruction, and a higher discount rate. Establishing successful doctoral programs also requires prior experience. MSU has the opportunity to demonstrate institutional capacity through its Defense and Strategic Studies and Occupational Therapy programs. However, rather than use its "ability to propose and receive approval for doctoral programs" as a metric for success, we should focus instead on the quality of implementation and student outcomes. Our concern is that a less rigorous review process that is less concerned about duplication, oversaturating the market, and institutional capacity will stretch state and student dollars even further at the expense of program quality and college affordability.

We appreciate the opportunity to comment on this request. MSU has proven its ability to propose high-quality professional doctorates outside of its CBHE-Approved Mission Description, and we have been happy to support the two such proposals it has put forward. The Comprehensive Review process, which has been improved to be more streamlined and effective, is an excellent tool to ensuring that these kinds of proposals for professional doctorates get the attention and review that they deserve. For that reason, we ask that the CBHE not modify MSU's mission statement to include an across-the-board authorization to offer professional doctorates.

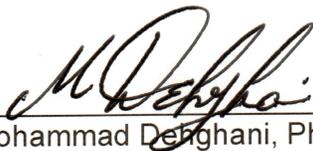
Best,



Kristin Sobolik, Ph.D.
Chancellor
University of Missouri – St. Louis



Mauli Agrawal, Ph.D.
Chancellor
University of Missouri – Kansas City



Mohammad Dehghani, Ph.D.
Chancellor
Missouri University of Science and Technology



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U N I V E R S I T Y

October 25, 2021

Dear Dr. Woody,

I write in response to the comment submitted by the chancellors of three campuses of the University of Missouri system—UMSL, UMKC, and Missouri S&T.

MSU's Mission Should Be Changed

The comment questions the need for the change. A university's CBHE-approved mission should accurately describe "the public institution's programs, audiences served, level and type of degrees offered, or other distinguishing factors." 6 CSR 10-4.010(1). CBHE has approved degree programs for MSU that are not part of MSU's current mission. Accordingly, MSU's mission no longer meets the legal standard, and it should be changed.

The proposed new mission is narrowly tailored. It satisfies 6 CSR 10-4.010(1) by making just a few modest changes to the existing language in MSU's mission. Moreover, the proposed new mission will be evergreen and not need to be updated each time MSU gets a new professional doctoral program approved.

The Proposed Change is in the Best Interest of Higher Education in Missouri

The comment also questions whether the change is in the best interest of higher education in the state, indicating a belief that the current process works well and need not be modified. The comment indicates that requiring a comprehensive review every time MSU proposes to offer a professional doctoral program "strikes the appropriate balance."

The legislature contemplated this issue and already struck an appropriate balance when it passed [SB 807](#) in 2018. The act reserves the following degree programs for the University of Missouri (RSMo 172.280):

- Doctor of Philosophy (Ph.D.)
- First-professional degree in dentistry (D.D.S. or D.M.D.)
- First-professional degree in law (J.D.)
- First-professional degree in medicine (M.D.)
- First-professional degree in optometry (O.D.)
- First-professional degree in pharmacy (Pharm.D.)
- First-professional degree in veterinary medicine (D.V.M.)

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The act further allows other public universities to offer the following degree programs only in collaboration with the University of Missouri and only if the University of Missouri is the degree granting institution (RSMo 173.005.2(2); 174.060):

- Degrees in engineering
- Degrees in chiropractic (D.C. or D.C.M.)
- Degrees in osteopathic medicine (D.O.)
- Degrees in podiatry (D.P.M, D.P., or Pod.D.)

Having set these parameters, the act authorizes the CBHE to decide whether to approve new degree programs by public universities with one caveat—the CBHE may authorize a degree program outside an institution’s CBHE-approved mission only after a comprehensive review process (173.005.2(1)).

To require MSU to forever complete a comprehensive review process to offer professional doctorates contradicts the statutory framework. Had the legislature wanted a comprehensive review process to apply to all professional doctoral programs offered by MSU, it would have said so in the statutes. Rather, MSU requests that the CBHE follow the statutory framework by adopting an appropriate mission for MSU and allowing the program approval process to run its due course.

Five public universities offer doctoral programs in Missouri. When we exclude the eleven categories of degree programs listed above that are reserved by statute for the University of Missouri, MSU awards significantly more professional doctoral programs than the three schools that oppose MSU’s mission change.

| Institution | Professional Doctoral Degrees Awarded 2019-20 |
|---------------------------|---|
| UM - Columbia | 183* |
| Missouri State University | 121 |
| UMSL | 93** |
| UMKC | 75*** |
| Missouri S&T | 0 |

Table Based on IPEDs data.

**Assumes all of UM-Columbia’s nursing doctorates (51) and education doctorates (60) are D.N.P.s and Ed.D.s and not Ph.D.s. This assumption is likely not true, meaning UM-Columbia actually awarded between 72 and 183 professional doctorates.*

***Assumes all of UMSL’s education doctorates (61) are Ed.D.s and not Ph.D.s. This assumption is likely not true, meaning UMSL actually awarded between 32 and 93 professional doctorates.*

****Assumes all of UMKC’s education doctorates (6) are Ed.D.s and not Ph.D.s. This assumption is likely not true, meaning UMKC actually awarded between 69 and 75 professional doctorates.*

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The above chart shows only last year's data. While 2020-21 IPEDs data is not yet available, it will likely show MSU surging farther ahead as MSU awarded 149 professional doctorates in 2020-21, bringing the total number of professional doctorates granted by MSU to over 1,000.

Given the above data, it makes little sense that UMSL, UMKC, and Missouri S&T's missions include professional doctorates while MSU's does not.

The impact of MSU's mission not including professional doctorates is that MSU must complete a comprehensive review process each time it proposes a new professional doctoral program. To require this of MSU unnecessarily delays the creation of new programs to meet critical workforce needs. This is particularly problematic and puzzling when universities that award fewer professional doctorates are not required to complete the comprehensive review process, and it is not in the best interest of higher education in the state. Further, it puts an undue burden on MDHEWD staff and the CBHE who could better spend their time comprehensively reviewing proposed programs that are actually outside an institution's ordinary course of business.

MDHEWD Will Still Rigorously Review MSU's Professional Doctoral Programs

UMSL, UMKC, and Missouri S&T indicate that they do not support a "carte blanche approach that would authorize MSU to offer professional doctorates in any field, without the rigorous review required by the new-and-improved Comprehensive Review process."

When a proposed program falls outside an institution's mission, MDHEWD performs a "comprehensive review." When the program falls within an institution's mission, MDHEWD performs a "routine review." Neither process is "carte blanche" and both are very rigorous.

Routine review ensures that the program avoids unnecessary duplication, builds on existing programs and faculty expertise, accounts for costs that are within the institution's budget, and is supported by a compelling rationale justifying the need for the program and why the institution is suited to deliver it at the proposed location. Under routine review, a program proposal is posted for public comment and the proposing institution must satisfactorily address any comments before receiving a 5-year probationary approval.

When compared to the routine review process, the comprehensive review process requires at least an extra year (and numerous additional meetings, documents, and forms) before an ultimate decision is reached. While still rigorously verifying the merits and appropriateness of the program, the routine review process is shorter and less onerous, relieving administrative burden for the institution and the department, and allowing for greater agility to meet workforce needs.

MSU's Doctoral Degree Programs Have a Record of Graduate Success

Graduates from MSU's professional doctoral programs have contributed dynamically to the state's workforce and economic growth.

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| Program | Graduation Rate | | | | |
|-------------|-----------------|------|------|------|------|
| | 2021 | 2020 | 2019 | 2018 | 2017 |
| AuD | 100% | 100% | 91% | 70% | 83% |
| DNAP | 100% | 100% | 100% | 100% | 98% |
| DNP | 85% | 71% | 62% | 76% | 78% |
| DPT | 100% | 100% | 100% | 95% | 100% |

| Program | Employment Upon Graduation | | | | |
|-------------|----------------------------|------|------|------|------|
| | 2021 | 2020 | 2019 | 2018 | 2017 |
| AuD | 100% | 100% | 100% | 100% | 100% |
| DNAP | 100% | 100% | 100% | 100% | 100% |
| DNP | 92% | 100% | 100% | 100% | 100% |
| DPT | 97.5% | 100% | 100% | 97% | 100% |

Modifying MSU’s CBHE-approved mission is a critical step to reducing the administrative burden required for MSU to develop new professional doctoral programs and continue to improve the state’s workforce.

I appreciate the opportunity to respond to the comment submitted by UMSL, UMKC, and Missouri S&T. For the reasons set forth in MSU’s proposal and in this response, I request that the CBHE change MSU’s mission as initially proposed.

Sincerely,

Clifton M. Smart, III
President
Missouri State University

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OZARKS TECHNICAL COMMUNITY COLLEGE

Office of the Chancellor

November 16, 2021

Dear Commission Mulligan,

The leadership team at Ozarks Technical Community College (OTC) has reviewed Missouri State University's proposal to change its CBHE-approved mission description. I write on behalf of OTC to strongly support MSU's request to change its mission description. I do so for several reasons, including the following two.

First, MSU's current mission description includes an out-of-date list of professional doctoral programs. The description is incorrect and it should be updated. In theory, the CBHE could simply update MSU's mission description each time it approves a new doctorate program at MSU. However, MSU has emerged as a leader in our region and throughout the state in professional doctoral programs, awarding more than 1,000 doctorates since 2002. Given MSU's leadership in professional doctorates, it makes sense to include professional doctorates generally in its revised mission description.

Second, OTC and MSU are the two largest higher education institutions in southwest Missouri, and we each have important roles to play in developing the area's workforce. Our regional economy requires robust professional doctorate opportunities.

Healthcare is one example. With two massive health systems in Springfield and other smaller systems throughout the rural parts of our region, access to doctors in audiology, anesthesiology, nursing practice, and physical therapy is critical. Market demand for these professionals has resulted in high graduation and employment rates for students in MSU's professional doctoral programs.

Educational doctorates are another example. Many administrative roles at OTC and other area educational institutions require a doctorate in education. To obtain such a degree from a public university, an individual must travel outside of our region and/or state. The only alternative is to pay considerably more to enroll in a doctoral program at a private university. This seems unreasonable and discriminatory toward our section of the state when we have MSU in our backyard—a large public university that specializes in education and is a statewide leader in professional doctorate programs.

Reducing administrative hurdles for MSU to offer professional doctoral programs will improve Missouri's workforce. OTC supports MSU's proposed change to its CBHE-approved mission description.

Sincerely,

A handwritten signature in black ink, appearing to read "Hal L. Higdon".

Hal L. Higdon, Ph.D.
Chancellor

cc: Clif Smart, President, Missouri State University



MISSOURI

November 28, 2021

Dear Dr. Woody,

This letter is our response to the points made by Missouri State University in response to the public comment we submitted on October 8. We appreciate the opportunity to engage in this dialogue and to share our views on what we believe to be an important proposal before the Coordinating Board.

Improving the Comprehensive Review Process

We agree with Missouri State University that the comprehensive review process should be improved. The comprehensive review process, which by design is workforce-oriented, should be agile enough to allow a proposing institution that meets statutory requirements to address documented workforce needs in a timely manner.

The MDHEWD staff have done a remarkable job over the last two years engaging with institutions to improve the review process, and we continue to support ways to foster further innovation thereof. For example, the department is currently considering a transition from an annual proposal cycle to accepting proposals on a rolling basis. We support this change and others that expedite the process without jeopardizing the ability of the department, Coordinating Board and other institutions to perform a rigorous review.

Improving the comprehensive review process to address valid concerns is a more productive approach than circumventing it altogether and will have fewer unintended consequences.

Comprehensive Reviews and Institutional Missions

“CBHE has approved degree programs for MSU that are not part of MSU’s current mission. Accordingly, MSU’s mission no longer meets the legal standard, and it should be changed.”

This misstates the purpose of comprehensive reviews and is directly counter to the conceptual framework that the department, CBHE and institutions of higher education agreed to as part of the 2016 Higher Education System Review Task Force (herein referred to as “Task Force”). In outlining its general principles, the Task Force concluded that, “approval of the program [through comprehensive review] will be granted as an exception to the institution’s state-defined mission and not as a change in mission. It will not represent a general authorization to grant degrees outside the institution’s state-defined mission.”

University of Missouri System

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Coordinating Board for Higher Education

Tab 14, Attachment D: Public Feedback Outside of the Comment Period

December 8, 2021

According to the Task Force, the purpose of this approach was to, “strike a balance between encouraging institutions to maintain fidelity to their core missions and granting institutions the flexibility they need to meet workforce demands.” We believe it is important that the CBHE retain its ability to strategically grant exceptions to institutional missions, without then being obligated to expand those missions as a result.

A Significant Shift in Higher Education Policy

“The proposed new mission is narrowly tailored. It satisfies 6 CSR 10-4.010(1) by making just a few modest changes to the existing language in MSU’s mission. Moreover, the proposed new mission will be evergreen and not need to be updated each time MSU gets a new professional doctoral program approved.”

The proposed mission change would represent a significant shift in statewide higher education policy, and it is important that it be acknowledged as such. The Task Force, which was established in 2016 at the request of Speaker of the Missouri House of Representatives Todd Richardson, brought together higher education leaders from two- and four-year institutions across the state to thoroughly study these types of issues and reach statewide consensus, which it did through concerted effort and support from the National Center for Higher Education Management Systems (NCHEMS).

The change would expand the number of professional doctorate programs Missouri State can offer without having to demonstrate alignment with workforce needs or to obligate an effort to collaborate with institutions whose mission already includes the proposed program(s). This would have negative implications for the state. The Task Force recognized as much when it indicated that, “Collaboration is strongly preferred as the means by which an institution should meet a local or regional workforce need for a program outside the institution’s state-defined mission.” Further, it concluded that, “Missouri should continue the policy of focusing professional doctoral program capacity at a limited number of universities.” Because a professional degree program requires significantly greater investments of institutional resources than a typical undergraduate degree program, MDHEWD and CBHE must consider what effects the creation of such programs will have on the overall investment of the state in higher education. The comprehensive review process, while imperfect, exists for this reason.

The comprehensive review process also accounts for the fact that collaborations may not always be realistic, and the CBHE has been clear that the lack of a willing collaborative partner should not impede an institution’s ability to meet a documented workforce need outside its mission. We completely support this. That is why the University of Missouri System has supported approval of Missouri State’s comprehensive review proposals for professional doctorates in defense studies and occupational therapy.

These are not trivial concerns in Missouri. At a population of just over 6.1 million, Missouri spreads scarce state resource across a relatively larger number of public four-year universities and, as the NCHEMS concluded, our state has historically underinvested in the research capacity of our universities.

Routine vs. Comprehensive Reviews

“While still rigorously verifying the merits and appropriateness of the program, the routine review process is shorter and less onerous, relieving administrative burden for the institution and the department, and allowing for greater agility to meet workforce needs.”

The routine and comprehensive review processes are different in meaningful ways. Routine reviews exist for academic program proposals that fall squarely within an institution’s mission. As such, these reviews are appropriately more focused on identifying programmatic issues. While duplication and institutional capacity are factors of this review, these are secondary considerations. This is by design: “There was broad consensus among task force members that the current academic program approval process should be updated to streamline the process for review of academic programs that are within an institution’s state-defined mission.” Therefore, “Proposals that fit within these parameters would be approved on an expedited basis.” As a result, only 1.6% of the 124 program proposals for bachelor's degrees and above put forward for routine review since December 2017 were withdrawn or rejected.

This is not a shortcoming of the routine review process but emphasizes that it is intended to serve a very different purpose than the comprehensive review process. It is not in the interest of efficiency, collaboration, and strategic CBHE leadership to approve a change that would greatly reduce the latter’s role in approving new professional doctoral programs outside an institution’s mission. Instead, we encourage CBHE to support the MDHEWD staff in identifying further innovations to the comprehensive review process.

Additional Considerations

Below are some additional questions, ideas and considerations to aid the CBHE in making an informed decision:

- **Professional vs. Research Doctorates:** The comprehensive review process is important in the context of doctoral degrees for another reason: the boundaries between a professional doctorate and a research doctorate are not always obvious. Professional doctorates are intended to be applied degrees, focused on scholarly practice, while research doctorates (PhDs) are focused on the development of original research. In practice, these distinctions are often blurred. For example, few professional doctorates require a dissertation, but some do (e.g., EdD and DBA programs). In addition, some institutions (historically Harvard was a prominent example) have chosen to offer professional doctoral degrees that operate identically to a PhD program. This creates additional ambiguity and risks of duplication that can be better evaluated and avoided through the comprehensive review process.
- **Institutional Plans:** It is not clear from existing documentation what Missouri State would do if its mission were expanded as proposed. It could modestly expand its professional doctorate degree offerings into a small number of new areas, or it could significantly

expand its professional doctorate offerings. If the former, then it is not unrealistic to expect it to utilize the existing comprehensive review process, through which it has been successful for programs we have publicly supported. If the latter, that should be of significant concern given the implications for state resources, workforce demand, and duplication. In both cases, it is not clear how circumventing the comprehensive review process serves the greater cause of higher education in our state.

- **Alternative Mission Modification:** There are other changes that could be made to Missouri State’s mission description that do not change statewide higher education policy. For example: “Missouri State also offers professional doctorate degrees in audiology, physical therapy, nursing practice, and nurse anesthesia, and other areas approved by the Coordinating Board through the comprehensive review process. Missouri State has particular strengths in business-related fields, agriculture, teacher education, environmental sciences and allied health disciplines.” If a change in mission is deemed necessary, this could be a good starting point.

Thank you for the opportunity to submit an additional response regarding Missouri State University’s October 25 letter in response to our concerns. We understand, and agree, that improvements to the comprehensive review process are necessary to ensure it is aligned with its workforce-oriented purpose. Identifying these changes should be the priority.

We recognize and appreciate the role that Missouri State University plays in offering professional doctorates in key areas, and we remain open to supporting future comprehensive review proposals it puts forward. However, the mission changes as proposed represent a significant and negative change in higher education policy that we believe does not serve the interests of the state. We respectfully request that the CBHE not approve the mission change proposal as originally submitted.

Sincerely,



Mun Choi, Ph.D.
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University of Missouri



Kristin Sobolik, Ph.D.
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**Higher Education System Review Task Force
Interim Report**

Overview

The Higher Education System Review Task Force was established at the request of Todd Richardson, Speaker of the Missouri House of Representatives, and Stephen Cookson, Chairman of the House of Representatives' Higher Education Committee. The Coordinating Board appointed the System Review Task Force at its June 9, 2016, meeting.

In their charge to the task force, the board asked the group to:

1. Conduct a systematic and thorough review of the overall structure of Missouri's system of higher education, which will include but not be limited to institutional missions, admissions selectivity, academic program review and approval, and geographic service regions.
2. Conduct a review of the demand for and supply of postsecondary education including occupational, geographic, and student perspectives.
3. Assess the relevance and functionality of the Coordinating Board's current mission approval structure and recommend changes to or replacement of that model.
4. Recommend revisions to the Coordinating Board policies both as they relate to future mission reviews and for program approval.
5. Recommend statutory changes as needed to enable the implementation of the revised system of institutional missions and program approval processes.

In the first stage of its work, the task force focused on the supply of and demand for postsecondary programs and developed a framework that will allow institutions to offer programs outside their state-defined missions if needed to fill a gap between supply and demand. Implementation of this framework requires a thorough revision of the Coordinating Board's academic program review process. The following task force recommendations focus on these revisions. Following these recommendations, the report summarizes information provided by National Center for Higher Education Management Systems (NCHEMS), the consultants engaged to inform the task force's work, relevant to that discussion. The report concludes with recommendations relevant to the same discussion and next steps needed to address the other items the board charged the task force with addressing.

This report was endorsed by the task force on December 13, 2016.

TASK FORCE RECOMMENDATIONS

Updating the Academic Program Approval Process to Allow Institutions to Meet Workforce Needs

The Coordinating Board must strike a balance between encouraging institutions to maintain fidelity to their core missions and granting institutions the flexibility they need to meet workforce demands. Task force discussions focused on the role the academic program approval process should play in striking that balance. There was broad consensus among task force members that the current academic program approval process should be updated to streamline the process for review of academic programs that are

within an institution's state-defined mission and to give institutions a mechanism by which to propose programs that are outside their state-defined mission.

Based on that consensus, the task force and a subcommittee of chief academic officers developed a proposed new framework for academic program approval. The framework, which is included as an attachment to this report and appended as if fully set forth herein, includes three levels of review for action related to academic program changes and requests for approval submitted by public institutions:

- Staff review, which would apply to minor program changes.
- Routine review, which would apply to proposed programs that are within an institution's state-defined mission and service region, do not unnecessarily duplicate an existing program in the geographically applicable area or other relevant distinction, will be offered at the institution's main campus, will build on existing programs and faculty expertise, and can be launched with minimal expense and within an institution's current operating budget. Proposals that fit within these parameters would be approved on an expedited basis.
- Comprehensive review, which would apply to proposals that constitute more significant changes described in detail in the attached framework. Proposals that meet any one of the criteria in the framework would be subject to a comprehensive review through which they would be required to demonstrate that the offeror made a good-faith effort to explore the feasibility of offering the program in collaboration with an institution the mission of which includes offering the program, is contributing substantially to the goals in the Coordinating Board's *Blueprint for Higher Education*, and has the existing capacity to ensure the program is delivered in a high-quality manner. The institution would also have to demonstrate that the proposed program is needed and that it has a clear plan to meet the articulated workforce need.

Pathways to Expanded Degree Offerings at Public Institutions

1. **Research and first-professional degrees.** The University of Missouri System (UM) and its four campuses (University of Missouri-Columbia, University of Missouri-Kansas City, Missouri University of Science and Technology, and University of Missouri-St. Louis) must strengthen its status as the state's public research university and exclusive granter of research doctorates. No other public college or university may offer a PhD or a first-professional degree, including chiropractic, dentistry, law, medicine, optometry, osteopathic medicine, pharmacy, podiatry, theology, and veterinary medicine. In order to meet an identified regional or local workforce need, collaborative programs in these fields with other Missouri institutions will continue to be an option.
2. **Exceptions to mission.**
 - a. **General principles.**
 - i. Collaboration is strongly preferred as the means by which an institution should meet a local or regional workforce need for a program outside the institution's state-defined mission.
 - ii. The Coordinating Board should approve an institution's request to offer a program outside its state-defined mission only after a comprehensive review.
 - iii. Approval of the program will be granted as an exception to the institution's state-defined mission and not as a change in mission. It will not represent a general authorization to grant degrees outside the institution's state-defined mission.

b. **Specific applications.**

- i. **Practice doctorates.** Missouri should continue the policy of focusing professional doctoral program capacity at a limited number of universities. The Coordinating Board should emphasize collaboration as the means to ensure access to these programs in all regions.

Harris-Stowe State University, Lincoln University, Missouri Southern State University, Missouri State University, Missouri Western State University, Northwest Missouri State University, Southeast Missouri State University, Truman State University, and the University of Central Missouri should be authorized to offer practice doctorates independently only when doing so would not unnecessarily duplicate an existing program, collaboration is not feasible or a viable means of meeting the needs of students and employers, and the institution has the academic and financial capacity to offer the program in a high-quality manner.

- ii. **Engineering.** Missouri should continue the policy of focusing capacity in undergraduate engineering programs (CIP Code 14) at a limited number of institutions and should emphasize collaboration as the means to ensure access to these programs in all regions.

Harris-Stowe State University, Lincoln University, Missouri Southern State University, Missouri State University, Missouri Western State University, Northwest Missouri State University, Southeast Missouri State University, Truman State University, and the University of Central Missouri may offer an engineering program only in collaboration with UM, provided that such collaborative agreements are approved by the governing board of each institution and that in these instances a UM campus will be the degree-granting institution. Should UM decline to collaborate in the offering of such programs, one of these institutions may seek approval of the program through the Coordinating Board's comprehensive review process when doing so would not unnecessarily duplicate an existing program, collaboration is not feasible or a viable means of meeting the needs of students and employers, and the institution has the academic and financial capacity to offer the program in a high-quality manner.

- iii. **Bachelor's degrees.** Missouri should continue the policy of limiting the degree-granting authority of public two-year institutions to the associate degree and certificate levels. The Coordinating Board should emphasize collaboration as the means to ensure access to these programs in all regions.

Public two-year institutions should be authorized to offer bachelor's degrees only if the level of education required in a field for accreditation or licensure increases to that level or, in the case of applied bachelor's degrees, the level of education required for employment in a field increases to that level, and when doing so would not unnecessarily duplicate an existing program, collaboration with a university is not feasible or the approach is not a viable means of meeting the needs of students and employers, and the institution has the academic and financial capacity to offer the program in a high-quality manner. Quality for such bachelor's degrees shall be evaluated at least in part by the delivery of upper-level coursework or competencies, and defined by accreditation or compliance with the Higher Learning Commission standards for bachelor's degrees.

3. Operational recommendations.

- a. **Proposal cycle.** Proposals will be submitted to the Coordinating Board by July 1 of each year. The Coordinating Board will determine which proposals to move forward with and announce their decision in September. Final decisions will ordinarily be made by February.
 - b. **Phased implementation.**
 - i. **Year 1.** The Coordinating Board will consider no more than three proposals, in total, to offer a degree outside an institution's state-defined mission during the first year the new framework is operational. No more than two proposals may come from either public universities or public two-year institutions. In the case of a changed licensure requirement that might warrant the authorization of more than one public two-year institution to offer a bachelor's degree, that proposal may be considered one proposal.
 - ii. **Year 2.** The Coordinating Board will consider no more than five proposals, in total, to offer a degree outside an institution's state-defined mission during the second year the new framework is operational. No more than three proposals may come from either public universities or public two-year institutions. In the case of a changed licensure requirement that might warrant the authorization of more than one public two-year institution to offer a bachelor's degree, that proposal may be considered one proposal.
 - iii. **Year 3.** The Coordinating Board will reconvene a task force to evaluate the new framework after two proposal cycles and recommend changes.
4. **Items for additional discussion.** Much of the task force's discussion to date has focused on institutions' ability to propose programs outside of their state-defined mission and the development of a framework by which those proposals could be evaluated. Several topics warrant significant additional conversation, including:
- a. **Continued work on the new academic program approval framework.** The framework developed by the task force and its subcommittee of chief academic officers requires significant additional discussion to develop and operationalize its details. The task force will appoint a subcommittee comprised of the Chief Academic Officers Council to work on this issue.
 - b. **Meeting students' needs and increasing postsecondary educational attainment rates.** NCHEMS' data suggest that the greatest gains in attainment can be made by focusing on increasing the college-going rate for 20- to 39-year olds and increasing completion rates at two-year institutions.¹ The data also indicate disparate access to and success in postsecondary programs among students in different geographic regions and of different races.² The task force will appoint a subcommittee to work on this issue.
 - c. **Strengthening collaboration.** Missouri's colleges and universities have a strong history of collaboration and have worked together in innovative ways to deliver high-quality programs throughout the state. The task force will appoint a subcommittee to develop principles of best practice in the collaborative delivery of programs and recommendations for policy changes that will provide more effective incentives for collaboration.

¹ NCHEMS Missouri Environmental Scan, slide 29.

² NCHEMS Missouri Environmental Scan, slides 10 and 63-65.

- d. ***Evaluating the mission review process.*** The task force will appoint a subcommittee to evaluate the mission review and approval process and make recommendations about revisions to Coordinating Board policies that pertain to mission review and approval.

Addressing regional institutional roles. NCHEMS recommends that the Coordinating Board take a proactive leadership role in facilitating coordination and collaboration among institutions serving the same geographic area, especially the Kansas City and St. Louis metropolitan areas. The task force encourages the Coordinating Board to appoint a work group to address this issue and report back to the board.

SUMMARY OF NCHEMS' OBSERVATIONS

Establishing a Baseline: Mission Review

The Coordinating Board charged the task force with reviewing the overall structure of Missouri's system of higher education, including each public institution's state-defined mission. Department staff engaged NCHEMS to develop an inventory of state-defined missions that will answer the following questions:

- Who does the institution serve? What kind of students, in terms of geographic area, level of academic preparation, and at what level of study? What kind of employers and economic development interests does the institution meet the needs of? What communities does the institution serve?
- What services does the institution offer? What levels of instruction are offered and what research is conducted?
- Does the institution have any special features or designations, such as status as a land-grant institution, a historically black college or university (HBCU), a liberal arts institution, or an institution with a special mission such as public affairs, applied learning, or international?³

NCHEMS has examined each institution's mission as indicated by state law, CBHE policy, and institutional documents, and has also developed statements of "behavioral" mission as reflected by audiences actually served, programs and services offered, and special competencies or unique capabilities. NCHEMS also compared each institution's "on paper" and "behavioral" missions. Based on that information, they developed a draft inventory of state-defined missions that includes some recommendations about changes in individual institutions' state-defined missions. Those recommendations were distributed to institutions on November 22, 2016, with a request for feedback by January 6, 2017. Department staff plan to present the state-defined mission inventory to the Coordinating Board for their consideration at the February 2, 2017, board meeting.

When the state-defined missions are approved by the Coordinating Board, they will be a device for articulating each institution's contribution to system capacity and ensuring differentiated contributions to the state's higher education goals.⁴ In addition, an inventory of state-defined missions will allow the Coordinating Board to identify gaps in terms of populations and geographic areas served and program offerings needed.

Identifying the Gaps: Supply and Demand

The Coordinating Board also asked the task force to review the demand for and supply of postsecondary education, including occupational, geographic, and student perspectives. The student perspective will be

³ NCHEMS Role and Mission for Missouri Colleges and Universities, slides 3-4.

⁴ NCHEMS Role and Mission for Missouri Colleges and Universities, slide 2.

explored in future work, but the task force did receive information about the occupational and geographic perspective.

Occupational Perspective

NCHEMS' research strongly suggests that Missouri's higher education system must evolve in order to compete on a national and global level. Forty-two percent of young adults in Missouri have an associate degree or higher, which is slightly lower than the national average of 45.7 percent and significantly lower than the national averages of Korea, Canada, Luxembourg, Ireland, the United Kingdom, Norway, Australia, Israel, Switzerland, and Sweden. Older Missourians have even lower rates of educational attainment. Only 41.7 percent of Missouri adults 35-44 years old have associate degrees or higher. That percent drops to 34.8 for adults 45-54 and 34.4 for adults 55-64.⁵

When these rates of educational attainment are compared to the percent of jobs that will require a postsecondary education in the future, it is clear that there is a gap. In 2020, 66 percent of jobs in Missouri will require a postsecondary education.⁶ Many of these jobs, however, will require a postsecondary credential that is often not taken into account when calculating states' educational attainment levels: a certificate or credential that takes less than two years to complete. Jobs for which certificates are required are projected to grow more than any other jobs requiring postsecondary credentials by 2020. NCHEMS' data indicate that there will be 255,000 new jobs that require a certificate between 2010 and 2020, compared to 84,000 jobs that require associate degrees; 219,000 that require baccalaureate degrees; and 117,000 that require graduate or professional degrees.⁷

NCHEMS also examined supply and demand within several industry clusters. At the baccalaureate and higher levels, NCHEMS concluded that Missouri is producing more graduates with degrees in healthcare (not including nursing); human services; research, planning, and analysis; communications; life and physical sciences; design; and agriculture than are needed in the workforce. The industry clusters for which there is an undersupply of baccalaureate-prepared graduates include finance; nursing; clerical and administrative; computing/IT; engineering; construction and architecture; transportation; hospitality, food, and tourism; and manufacturing and production.⁸

At the associate and certificate level, NCHEMS concluded that Missouri is producing more sub-baccalaureate level graduates in nursing, computing/IT, and engineering than are needed in the workforce. The industry clusters for which there is an undersupply of associate and certificate level graduates include clerical and administrative; maintenance, repair, and installation; healthcare (clerical and support); finance; healthcare (not including nursing); manufacturing and production; human services; and agriculture.⁹

It is important to note, however, that some of the data presented above are inconsistent with other sources of labor market information, especially when broken down by region. St. Louis Community College, for example, has provided data produced by the Missouri Economic Research & Information Center and Burning Glass Technologies that indicate that, in the St. Louis metropolitan area, there are significantly more openings for associate degree nurses than local postsecondary institutions are producing. STLCC and other institutions have also noted that conversations with local employers contradict NCHEMS' conclusions, especially in the areas of nursing and computing/information technology.

All of the above notwithstanding, NCHEMS also observed that data about current and projected demand are insufficient to make the case to support the addition of programs. They recommend a different

⁵ NCHEMS Missouri Environmental Scan, slide 6.

⁶ NCHEMS Missouri Environmental Scan, slide 14.

⁷ NCHEMS Missouri Environmental Scan, slide 20.

⁸ NCHEMS Missouri Environmental Scan, slide 21.

⁹ NCHEMS Missouri Environmental Scan, slide 22.

approach to determining demand, such as initiating a program on a collaborative basis to test its sustainability.¹⁰

Geographic Perspective

NCHEMS’ data and observations suggest two primary challenges in terms of geography: Students in some rural areas of the state participate in postsecondary education at significantly lower rates than their peers in other areas, while public institutions in urban areas may plan to offer programs that duplicate programs already offered by other public institutions in the area.

Proximity to a college or university impacts college-going rates dramatically. Most public universities in Missouri draw their enrollment from their immediate region – and from St. Louis and Kansas City.¹¹ As a result, some regions of the state are underserved in terms of access to public postsecondary education. High school seniors from 15 Missouri counties are significantly less likely than their peers from other counties to start a postsecondary program at a public institution immediately after graduation.¹²

Counties from Which the Lowest Percent of High School Graduates Enroll in Public Postsecondary Education

| <u>Any Public Institution</u> | <u>Public Two-Year Institutions</u> | <u>Public Universities</u> |
|-------------------------------|-------------------------------------|----------------------------|
| Barry | Andrew | Butler |
| Barton | Atchison | Carter |
| Cedar | Barry | Clark |
| Clark | Barton | Douglas |
| Douglas | Buchanan | Howell |
| Hickory | Gentry | Marion |
| Lewis | Holt | Oregon |
| Linn | Lewis | Ozark |
| Macon | Madison | Ripley |
| Madison | Mercer | Shannon |
| Mercer | Nodaway | Texas |
| Ozark | Putnam | Washington |
| Putnam | Vernon | Wayne |
| Vernon | Worth | Wright |
| Worth | | |

NCHEMS noted that historically, students have been expected to go to the provider. Now students must be served where they are with the content taken to them.¹³

For high school graduates in St. Louis and Kansas City, on the other hand, NCHEMS observed that nearly every public university in the state draws students from those areas and that two or more public universities often compete to serve the same region.¹⁴ Task force members noted, however, that because of the size and diverse nature of those areas, some groups within St. Louis and Kansas City remain underserved.

¹⁰ NCHEMS Role and Mission for Missouri Colleges and Universities, slide 8.

¹¹ NCHEMS Draft Observations and Recommendations on Missouri Role and Missions, slide 7.

¹² NCHEMS Missouri Environmental Scan, slides 63-65.

¹³ NCHMES Role and Mission for Missouri Colleges and Universities, slide 6.

¹⁴ NCHEMS Draft Observations and Recommendations on Missouri Role and Missions, slide 7.

Higher Education System Review Task Force Roster

Chuck Ambrose (University of Central Missouri)
Joanna Anderson (State Fair Community College)
Jon Bauer (East Central College)
Barbara Bichelmeyer (University of Missouri-Kansas City)
Doug Davenport (Missouri Western State University)
Steve Graham (University of Missouri)
Mark James (Metropolitan Community College)
Jeff Jochems (Ozarks Technical Community College)
Steve Kurtz (Mineral Area College)
Jennifer Methvin (Crowder College)
Zora Mulligan (Commissioner of Higher Education)
Jeff Pittman (St. Louis Community College)
Clif Smart (Missouri State University)
Dwyane Smith (Harris-Stowe State University)
Shawn Strong (State Technical College)
Carlos Vargas (Southeast Missouri State University)

Program Approval Framework

Background

On March 17, 2016, Speaker of the House Todd Richardson and House Higher Education Committee chair Steve Cookson directed the Missouri Department of Higher Education (MDHE) to convene stakeholders to begin a process of reviewing the current structure of higher education in Missouri. The letter indicated that the review should include, but not be limited to, recommendations on the overall structure of public two- and four-year institutions, varying institutional missions, and the degree review and approval process. The MDHE has convened a task force to address the issues identified in the letter. The task force formed a subcommittee of chief academic officers (CAOs) to address the degree review and approval process. Because this process to some extent also involves independent institutions, the subcommittee includes representation from that sector and will make recommendations relating to the process for all institutions of higher education.

The following draft is based, in part, on the structure and format of the review processes in Indiana, Texas, and Maryland, as well as current CBHE policies and practices. The draft has been refined substantially after discussion with the subcommittee and other CAOs. It provides a general framework for determining which level of review is appropriate and an overview of the requirements and process associated with each level. After the subcommittee, task force, and CBHE approve the policy framework, MDHE staff will work with the Council of Chief Academic Officers to define additional details, which will eventually be promulgated as regulations.

Objectives

This draft is aimed at outlining a process that achieves three objectives:

1. Ensure Missouri's higher education institutions offer rigorous, high-quality, student-centered programs that effectively serve the citizens of the state while supporting statewide goals, regional workforce demands, and institutional needs.
2. Ensure Missouri's higher education institutions make efficient use of state resources, maintain high standards, collaborate to the maximum extent possible, and design programs that avoid unnecessary duplication at the regional and state levels.
3. Streamline the academic program review and approval process.

General Approach

The MDHE proposes a review process that involves three levels of review: Staff review, which applies to minor changes; routine review, which will likely apply to most new program proposals; and comprehensive review. The following table provides a general framework for determining which level of review is appropriate and an overview of the requirements and process associated with each level. As indicated above, after the subcommittee, task force, and CBHE approve the policy framework, MDHE staff will work with the Council of Chief Academic Officers to define additional details, which will eventually be promulgated as regulations. Many terms and concepts will require further definition. Those that have been identified in early discussions are italicized in the following text and listed at the end of the document.

| | Staff Review | Routine Review | Comprehensive Review |
|---------------------------------|---|--|--|
| Applies To | <p>Minor program changes can be addressed through a simple staff review. Examples of these changes include:</p> <ul style="list-style-type: none"> • <i>Change of program title</i> • <i>Combination programs</i> • <i>Single-semester certificate programs</i> • <i>One-year certificate programs</i> • Adding an <i>option</i> to an existing program • Moving an existing program to <i>inactive status</i> • <i>Program deletion</i> | <p>Proposals that do not constitute a significant change in an institution’s current role, scope, or mission will be reviewed under the routine review process. In order to qualify for the routine review process, the proposed program must meet <u>all</u> of the following criteria:</p> <ol style="list-style-type: none"> 1. The program is clearly within the institution’s <i>CBHE-approved mission</i>. For purposes of this process, “mission” means the population the institution serves; the level and array of degrees, programs, and services it offers; and any special or unique features; 2. The program will be offered within the proposing institution’s <i>CBHE-approved service region</i>; 3. The program will not <i>unnecessarily duplicate</i> an existing program in the <i>applicable geographic area</i>; 4. The program will be offered at the main campus; 5. The program will build on existing programs and faculty expertise; and 6. The cost to launch the program will be minimal and within the institution’s current operating budget. <p>In addition, the following proposals will generally be considered under the routine review process:</p> <ol style="list-style-type: none"> 1. <i>Substantive curricular changes to an existing program.</i> 2. The addition of an approved program at a <i>CBHE-approved off-site location</i>. 3. New degree programs that are offered in collaboration with an institution already approved to offer such a program. | <p>Proposals that constitute more significant changes will be subject to a comprehensive review. Program proposals offered by an institution other than a campus within the University of Missouri System that meet <u>any one</u> of the following will be subject to a comprehensive review:</p> <ol style="list-style-type: none"> 1. The program is outside an institution’s <i>CBHE-approved mission</i>. For purposes of this process, “mission” means the population the institution serves; the level and array of degrees, programs, and services it offers; and any special or unique features; 2. The program will be offered outside the institution’s <i>CBHE-approved service region</i>; 3. The program will require approval from the Higher Learning Commission; 4. The institution will incur substantial costs to launch and sustain the program; 5. The program will include the offering of an engineering degree that falls within the Classification of Instructional Programs (CIP) code of 14; 6. The program will include the offering of a doctoral degree; 7. The program will include the offering of a professional degree; or 8. The program will include the offering of an education specialist degree. |
| Institution Must Provide | <p>A basic description of the change on forms provided by the MDHE.</p> | <ol style="list-style-type: none"> 1. <i>General information about the proposed program</i>; 2. <i>Certification</i> that the proposal meets the criteria for routine review outlined above; and 3. <i>Certification</i> that the program meets the <i>criteria for all new academic programs</i>. | <ol style="list-style-type: none"> 1. Evidence the proposing institution has explored the feasibility of collaboration with other institutions whose mission or service region are within the scope of the proposed program. The proposing institution shall provide evidence that it has made a good faith effort to explore the feasibility of collaboration. Evidence should include an explanation for why the collaboration is not feasible, as well as a letter of corroboration from any other institution involved in the discussion of collaboration. 2. <i>General information about the proposed program</i>; 3. <i>Evidence</i> that the offering institution is contributing substantially to the CBHE’s <i>Blueprint for Higher Education</i> and committed to advancing the goals of that plan; 4. <i>Evidence of institutional capacity</i> to launch the program in a high-quality manner, including: <ol style="list-style-type: none"> 4.1. <i>An external review</i> conducted by a team including faculty experts in the discipline to be |

| | Staff Review | Routine Review | Comprehensive Review |
|--|--------------|----------------|---|
| | | | <p>offered and administrators from institutions already offering programs in the discipline and at the degree level proposed. The review must include an assessment of the offering institution's capacity to offer the new program in terms of general, academic, and student service support;</p> <p>4.2. A comprehensive cost/revenue analysis summarizing the actual costs for the program and information about how the institution intends to fund and sustain the program;</p> <p>4.3. Evidence indicating there is sufficient student interest and capacity to support the program, and, where applicable, sufficient capacity for students to participate in clinical or other external learning requirements; and</p> <p>4.4. Where applicable, a description of accreditation requirements for the new program and the institution's plans for seeking accreditation; and</p> <p>5. Evidence that the proposed program is needed, including:</p> <p>5.1. Documentation demonstrating that the program does not <i>unnecessarily duplicate</i> other programs in the <i>applicable geographic area</i>;</p> <p>5.2. Evidence indicating that the offering institution has made a good faith effort to explore the feasibility of a <i>collaborative program</i>, and if the institution has chosen not to offer the program in <i>collaboration</i> with another institution, an explanation of the rationale for that choice; and</p> <p>5.3. A rigorous analysis demonstrating a strong and compelling workforce need for the program, which might include data from a credible source, an analysis of changing program requirements, the current and future workforce and other needs of the state, and/or letters of support from local or regional businesses indicating need for the program;</p> <p>6. A clear plan to meet the articulated workforce need, including:</p> <p>6.1. Aligning curriculum with specific knowledge and competencies needed to work in the field(s) or occupation(s) described in the workforce need section;</p> <p>6.2. Providing students with external learning</p> |

| | Staff Review | Routine Review | Comprehensive Review |
|----------------|---|---|---|
| | | | <p>experiences to increase the probability that they will remain in the <i>applicable geographic area</i> after graduation;</p> <p>6.3. A plan for assessing the extent to which the new program meets that need when implemented.</p> |
| Process | Proposals subject to the Staff Review process will be reviewed by MDHE staff and reported at the next CBHE meeting. Institutions must report all program changes to ensure that the state program inventory is accurate and complete. | <ol style="list-style-type: none"> 1. MDHE staff review the proposal to determine if the proposed program is eligible for routine review. 2. MDHE staff post the proposal for public review and comment, along with staff's recommendation to approve the program provisionally. 3. [The final draft policy framework will describe the CBHE approval process in more detail. MDHE staff intend to discuss process changes with the CBHE that would reduce the total time required for approval of a new degree proposal under the routine review process.] 4. The five-year provisional review process currently in use applies. | <ol style="list-style-type: none"> 1. MDHE staff and other institutions review the proposal and provide feedback to the offering institution. 2. The offering institution responds to feedback. 3. [New program proposals subject to the comprehensive review process will be reviewed on the timeline currently in place. This will be detailed more thoroughly in the final draft.] 4. If approved, new programs approved under the comprehensive review process must report annually to the CBHE on the number of students completing the program, financial performance of the program, job placement rates of program graduates, success on any applicable licensure exams, and the extent to which the program is meeting the needs it was designed to address. |

Terms to be defined:

Applicable geographic area
CBHE-approved mission
CBHE-approved off-site location
CBHE-approved service region
Certification
Change of program title
Collaborative program and collaboration
Combination programs

Comprehensive cost/revenue analysis
Criteria for all new academic programs
Evidence of contribution to CBHE Blueprint
Evidence of institutional capacity
External review
General information about the proposed program
Inactive status
One-year certificate programs

Option
Program deletion
Single-semester certificate programs
Substantive curricular changes to an existing program
Unnecessary duplication/unnecessarily duplicate
Professional Degree



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U N I V E R S I T Y

December 2, 2021

Dear Dr. Woody,

Thank you for giving me the opportunity to respond to the letter you received on November 28. Recognizing that the CBHE meeting is less than a week away, I will be brief.

Missouri State University (MSU) seeks only the same treatment on professional doctorates currently afforded to the four University of Missouri campuses.

MSU has demonstrated its ability to offer professional doctorates:

- MSU has offered professional doctorate programs since 2002.
- MSU has awarded more than 1,000 professional doctoral degrees.
- MSU has the second largest enrollment¹ in professional doctoral programs among public universities in the state, trailing only the University of Missouri-Columbia.
- Graduation and employment rates are very high for students completing MSU's professional doctoral programs.

The CBHE has rightfully entrusted University of Missouri – Columbia, UMSL, UMKC, and Missouri S&T to offer professional doctorates following a “routine review” program approval process. Given MSU's record of success in professional doctorates, MSU respectfully requests that the CBHE entrust it in the same way.

The November 28 letter references the 2016 Higher Education System Review Task Force Report. This report must be understood in context.

In 2016, legislation was filed that would remove all statutory prohibitions on doctoral programs. The legislation proved controversial, and leadership in the General Assembly instructed the Department of Higher Education to collaborate with public universities and other stakeholders to propose an alternative.

The department convened a task force, held meetings throughout 2016, and the task force developed the report. That report was presented to the General Assembly. Legislation was drafted, hearings were held, and floor debate and amendments occurred. SB 807 was ultimately signed into law.

Likewise, changes to 6 CSR 10-4.010 were drafted and promulgated through a formal rulemaking process.

¹ Excluding the programs set out in 6 CSR 10-4.010(9)(C)(3) that MSU is barred from offering.



Missouri State[™]

U N I V E R S I T Y

SB 807 and 6 CSR 10-4.010 differ somewhat from the language of the Task Force Report. This is because the issue wasn't resolved merely when the task force issued its report. The Task Force Report is not the final document laying out the terms of the "agreement." SB 807 and 6 CSR-4.010 are the final documents laying out the terms of the "agreement."

These laws rightly stop short of requiring that MSU put all doctoral programs through a comprehensive review process—forever and always. Such an inflexible requirement would leave the CBHE without the necessary tools to manage the evolving landscape of degree programs and workforce development.

Rather, the statutes and rules provide that MSU must put new academic programs through a comprehensive review process only if they fall outside of its CBHE-approved mission. The law also recognizes that a university's mission will change over time.

Much has changed since the task force issued its report in 2016. New professional doctorates at MSU have been approved, and enrollment in those programs has significantly increased. MSU now has the second largest enrollment in professional doctoral programs, and enrollment continues to steadily increase.

The time has come to change MSU's mission to include professional doctorates. This mission change is in the best interest of the citizens of Missouri. It will provide students greater choice and expanded opportunities for professional-degree preparation. It will also broaden the highly-skilled workforce and meet employer needs.

It is important to note that MSU is not seeking to offer PhDs or the first-professional degrees listed in 6 CSR 10-4.010(9)(C)(3). Rather, MSU seeks to have its mission changed—a request that is perfectly appropriate under the applicable laws.

I appreciate the opportunity to respond to the November 28 letter. For the reasons set forth in MSU's proposal and responses to the comments received by MDHEWD, I respectfully request that the CBHE change MSU's mission as proposed.

Sincerely,

Clifton M. Smart, III
President
Missouri State University

OFFICE OF THE PRESIDENT



DEPARTMENT OF HIGHER EDUCATION & WORKFORCE DEVELOPMENT

MEMORANDUM

TO: Members of the Coordinating Board for Higher Education

FROM: Zora Mulligan 
Commissioner

RE: Response to correspondence regarding Missouri State University's request to change its CBHE-approved mission description

DATE: December 3, 2021

I am writing to respond to concerns raised in the University of Missouri System's November 20, 2021, correspondence regarding Missouri State University's request to change its CBHE-approved mission description.

1. Improving the Comprehensive Review Process

The UM System asserts that improving comprehensive review is a better way to address challenges with the process than changing MSU's mission to allow them to use routine review for proposals related to professional doctoral degrees.

DHEWD staff are working to streamline the comprehensive review process, but the improved process will still take substantially more time to complete than routine review. One of the primary purposes of comprehensive review is to provide assurance that institutions have the capacity to offer a new level of degree or a new program that is unlike the programs they currently offer. Steps associated with that assurance are generally the most time-consuming components of the comprehensive review, but because of their importance, they are not likely to be removed from the new streamlined process. They will remain important elements of the review for community colleges seeking to offer bachelor's degrees, other public universities seeking to offer professional doctoral degrees, or other major changes.

Missouri State, however, is in a unique position. Because they have been offering professional doctoral degrees since 2002, they have long-standing experience administering those programs. That experience provides a strong indication that Missouri State will be able to offer quality professional doctoral programs without the additional steps required in the comprehensive review process.

2. Comprehensive Reviews and Institutional Missions

The UM System asserts that approving MSU's request would be inconsistent with the 2016 Higher Education System Review Task Force, which includes the statement, "Approval of the program [through comprehensive review] will be granted as an exception to the institution's state-defined

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Every Missourian empowered with the skills and education needed for success.

mission and not as a change in the mission. It will not represent a general authorization to grant degrees outside the institution's state-defined mission."

From my perspective, MSU's most persuasive argument is the fact that they offer five professional doctoral programs and have graduated over 1,000 students from those programs. As the following table indicates, four out of their five programs were approved before the 2016 task force report and were not approved through the comprehensive review process. All 1,004 of the students who have graduated from MSU's professional doctoral programs are from the pre-2016 programs.

| Professional Doctoral Degrees Offered by MSU | Year of Program Initiation | Fiscal Year of First Graduates | Number of Graduates Since Inception |
|---|-----------------------------------|---------------------------------------|--|
| Doctorate of Audiology (AuD) | 2002 | 2006 | 147 |
| Doctor of Physical Therapy (DPT) | 2005 | 2008 | 458 |
| Doctor of Nursing Practice (DNP) | 2012 | 2015 | 107 |
| Doctor of Nurse Anesthesia Practice (DNAP) | 2014 | 2016 | 292 |
| Doctor of Defense & Strategic Studies (DDSS) | 2020 | | |

Based on this information, the Coordinating Board's consideration of this change is not based on programs approved through comprehensive review – it is based on a much longer-standing trend.

In addition, the language quoted in the UM System's response does not apply squarely to MSU's request. The quoted language would prohibit MSU from offering professional doctoral programs without going through comprehensive review unless their state-approved mission included those programs. If MSU was circumventing the task force language, they would have asserted that they could offer any professional doctorate after their Doctor of Defense & Strategic Studies proposal was approved in 2020 rather than asking the CBHE to update their mission description.

3. A Significant Shift in Higher Education Policy

The UM System notes several concerns in this section.

- a. *Changing MSU's mission would relieve Missouri State of the responsibility to demonstrate alignment with workforce needs.*

If the board grants Missouri State's request, MSU will be required to seek approval of new professional doctoral programs through routine review. Routine review requires institutions to provide a "compelling rationale justifying the need for the program and why the proposing institution is best suited to deliver the program." Although this requirement does not include the words "workforce needs," the language indicates that Missouri State will be required to provide evidence of a compelling local need.

While the UM System is correct in observing that routine review proposals are almost always approved, those proposals are subject to a public comment period that allows institutions and individuals an opportunity to express opinions. The administrative rule that governs routine review provides that the commissioner will only recommend that a program be approved through routine review “[o]nce all concerns have been resolved.”

- b. *The task force report recommended that “Missouri should continue its policy of focusing professional doctoral program capacity at a limited number of universities.”*

First, Missouri State is already among the universities that have professional doctoral program capacity and four of those five programs were approved before the 2016 task force.

Second, approving Missouri State’s request will not create a slippery slope that will end with every public university offering professional doctoral degrees without going through comprehensive review. Currently no other public university outside of the UM System offers a doctoral degree. MSU offered its first professional doctorate 20 years ago. If any other public university slowly builds a track record of offering professional doctoral degrees over the next 20 years, it might be appropriate for the Coordinating Board to consider updating that institution’s mission at that point.

- c. *Allowing MSU to offer more professional doctoral degrees may have a negative impact on the state’s overall investment in higher education.*

Because Missouri does not have a funding formula for higher education, there is generally very little relationship between the programs an institution offers and the amount of state funding it receives. Adding a new program at any level does not guarantee that an institution will receive an increased share of the higher education appropriation. While it is true that some institutions advocate for and receive additional funds to support the development and/or operation of particular programs, to address differences in per-student funding levels, or for capital improvements, that practice began long before Missouri State offered its first professional doctoral degree and will continue long after the board makes a decision on this matter.

Institutions whose programs have been approved through routine review are situated uniquely poorly to engage in such advocacy. Routine review requires institutions to meet criteria including, “[t]he cost to launch the program will be minimal and within the institution’s current operating budget.” This would make it difficult for an institution to seek additional state funding that might otherwise have been appropriated to another institution.

- d. *Changing MSU’s mission would relieve Missouri State of the responsibility to offer programs in collaboration with other institutions.*

I agree that changing MSU’s mission would mean that they are no longer required to seek to offer professional doctoral programs in collaboration with other

institutions, but I believe that the change is warranted by the information in this memo. As indicated in 1 above, Missouri State has already developed expertise in offering professional doctorates. They will still be required to collaborate with other institutions to offer PhDs or first-professional degrees including dentistry, law, medicine, optometry, pharmacy, or veterinary medicine.

It is also noteworthy that Missouri State has exceptionally strong collaborative relationships currently in place, including a pharmacy program offered in collaboration with the University of Missouri-Kansas City, an engineering program offered in collaboration with the Missouri University of Science & Technology, and numerous long-standing and deep-rooted partnerships with community colleges.

- e. *Our state has historically underinvested in the research capacity of our universities.*

This statement is true. It is also important to note that MSU is not seeking to become a research university. State law provides that “[t]he University of Missouri is the state’s only public research university and the exclusive grantor of research doctorates.” An institution that offers professional doctorates is not a research university.

In addition, MSU’s proposed mission description addresses this concern by indicating that the institution offers degrees “appropriate to a teaching institution with a predominately undergraduate student body” and indicating that “Missouri State University does not offer first-professional degrees as defined in 6 CSR 10-4.010(9)(C)(3).”

4. Routine versus Comprehensive Reviews

As explained in 3a above, the UM System’s observations about routine review are correct. The process can, however, provide opportunities for DHEWD staff and stakeholders to raise concerns about routine review proposals and only allows the commissioner to submit such proposals for the board’s approval “once all concerns have been resolved.”

5. Professional versus Research Doctorates

The UM System expresses concern that the line between professional and other doctorates is not always clear.

These concerns can also be addressed through routine review. If a MSU submits a proposal for a program that does not appear to be a professional doctorate, DHEWD staff or institutions can flag the issue and ask MSU to address the concern. The commissioner can only submit such proposals for the board’s approval “once all concerns have been resolved.”

6. Institutional Plans

The UM System expresses concern that MSU’s long-term plans are unknown. If they include modest expansion of professional doctoral programs, MSU could reasonably use the comprehensive review process. If their plans include significant expansion of those programs, the Coordinating Board should consider the potential long-term implications of the change.

This change will have value even if MSU only adds a small number of professional doctoral programs in the near future. They will be able to respond more quickly to changing workforce demand, funding opportunities, and community needs. This is significant, even if only needed occasionally.

In the longer term and bigger picture, the University of Missouri System has continued to grow and thrive since Missouri State began offering professional doctoral degrees in 2002. Graduate and first professional enrollment at universities within the UM System has increased by 33 percent during that time and their total headcount has increased by 50 percent.

Finally, I believe that it is appropriate to recognize that Missouri State and southern Missouri have evolved significantly in the last 20 years. Data from the 2020 Census indicate that Springfield is the state's fastest-growing metro area. Working professionals in the Ozarks should have access to high-quality, relatively affordable, and (for those who prefer it) in-person professional doctoral education. Giving Missouri State flexibility to meet those needs as quickly as possible will be essential as the region responds to the long-term health and economic challenges resulting from COVID-19 and the Great Resignation, which will accelerate as more baby boomers age out of the workforce. It will also allow Missouri State to meet the needs of an increasingly dynamic and economically vital part of the state.