



VERMONT HIGHER  
EDUCATION COUNCIL

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## Memorandum

TO: Krista Huling, Chair, Vermont Board of Education ([krista.huling@vermont.gov](mailto:krista.huling@vermont.gov))  
FROM: Rich Schneider, Chair, Vermont Higher Education Council Certification Committee  
([rschneider@norwich.edu](mailto:rschneider@norwich.edu))  
DATE: October 29, 2018 (**Amended November 8, 2019**)  
RE: Renewal Standards in Vermont Rules for Postsecondary Certification

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It has come to our attention that there is language in the recently revised rules for postsecondary accreditation that may constrain the ability of new institutions of higher education to successfully begin and sustain operations in Vermont. We would like the opportunity to discuss this issue with the Board and explore possible solutions that serve the interests of all parties.

The language of concern is Section 2243.3 of the Board's Rules for Certification of Postsecondary Schools that addresses Renewal of Certification, which states:

*Any school seeking renewal, that has obtained initial approval to offer or operate a program of college or professional education for credit or degree, on or after January 1, 2015, shall obtain accreditation from an accrediting entity recognize by the US Department of Education, in order to be considered eligible for renewal by the State Board.*

Under the current practice of the VHEC Certification Committee, our review committees have recommended that new institutions seeking certification be reviewed again in two or three years in order to ensure that the schools have maintained their ability to meet standards. We believe this provides institutions with a reasonable time frame to address potential issues and enables them to benefit from the experience of the reviewers on the Certification Committee as they move towards accreditation.

A reasonable time frame for a new institution to achieve regional accreditation from the New England Commission on Higher Education (NECHE, the new name for the former NEASC) is five years. However, Section 2243.3 of the Vermont rules says that campuses must be accredited before renewal. As a result, VHEC must either recommend certification for five years to give a new institution a fair shot of obtaining regional accreditation, or maintain our current recommendation time frame and put the institution's State renewal at risk. The VHEC Certification Committee does not believe it is in the best interests of new institutions or the State of Vermont to recommend to the Agency of Education certification of five years without some interim review.

We would like to discuss an alternative structure through which we could recommend (and you could consider) a shorter term of certification during which one review for renewal would be possible, so long as the institution was in the process of seeking regional accreditation, before requiring full regional or national accreditation.

cc: VHEC Board of Directors (College Presidents & VSAC)  
cc: Cassandra Ryan, Postsecondary Education ([cassandra.ryan@vermont.gov](mailto:cassandra.ryan@vermont.gov))  
cc: Daniel French, Secretary, Agency of Education ([daniel.french@vermont.gov](mailto:daniel.french@vermont.gov))  
cc: Carrie Williams Howe, Executive Director, Vermont Higher Education Council ([carrie@vermonthec.org](mailto:carrie@vermonthec.org))

**November 8, 2019 Ammendment**

Submitted by Sophia Howlett, New Chair of VHEC Certification Committee

**Suggested new language:**

*Any school seeking renewal, that has obtained initial approval to offer or operate a program of college or professional education for credit or degree, on or after January 1, 2015, shall obtain accreditation from an accrediting entity recognized by the US Department of Education, in order to be considered eligible for renewal by the State Board, **unless certification has been granted for less than the standard five-year period. In the case of a shorter-term certification period, one Vermont renewal will be considered so long as the institution is in the process of seeking regional or national accreditation.***