



Quality Counts

State Action for Postsecondary Quality Assurance

Krista Kaput, Sharmila Mann, and Nick Lee

SEPTEMBER 2024

Introduction

State¹ governments invest billions of dollars annually in public and private postsecondary education to support workforce development needs and build residents' economic mobility.² State regulatory agencies monitor the quality of institutions of higher education (IHEs) to safeguard this investment, support residents' access to beneficial postsecondary experiences, and protect them from fraud and abuse.

Through desk research and expert interviews, Bellwether identified six primary levers that state regulatory agencies employ for their postsecondary institutions' quality assurance (QA) (Table 1). These levers allow states to monitor and enhance institutional QA efforts in various areas, including access, equity, academic quality, accountability, transparency, student success, alignment with state goals, and continuous improvement.³ Bellwether conducted further research and interviews with state leaders to understand how these six QA levers were implemented across states.

TABLE 1: SIX LEVERS STATES USE TO SUPPORT QUALITY ASSURANCE

Lever	Description
1. Public Governance Structures	States establish governance structures to oversee public IHEs. Higher education governance systems across the states are varied and complex but share a common goal of providing institutional accountability as well as standardization and consistency across institutions within the state. These public governance structures support QA in public institutions through their oversight of institutional resource allocation, equity and access, and policy implementation, among other actions.
2. Authorization and Reauthorization	State regulatory bodies authorize private and out-of-state IHEs to operate and offer educational programs within their state. This oversight can help ensure IHEs meet basic quality standards and provide the state with an opportunity to hold them accountable for their performance and outcomes.
3. Program Approval and Review	Most states require a periodic review and renewal of specific programs offered by IHEs. This is the primary area where student academic outcomes metrics (e.g., graduation rates and licensure and certification exam passage rates) are used.
4. Data Collection, Analysis, and Dissemination	States collect postsecondary data to promote transparency, accountability, and consumer protection for students and other stakeholders. State higher education agencies or coordinating boards typically collect and publish data reports annually or periodically, depending on the state.
5. Consolidation and Closures	State agencies sometimes merge or integrate two or more colleges or universities into a single entity. Consolidation is meant to reduce costs, improve efficiency, enhance academic programming, and better serve the institution's students. Closure addresses issues like financial instability, low enrollment, or inadequate academic performance.
6. Consumer Protection	Higher education consumer protection measures are state-level policies that apply to IHEs and supplement general state consumer protection laws. These policies aim to safeguard students who attend IHEs and ensure they are treated fairly.

Two overarching themes arose while analyzing state efforts within these six levers. **First, states have made the most progress in supporting postsecondary QA through two of the six levers: Lever 4 (Data Collection, Analysis, and Dissemination) and Lever 6 (Consumer Protection).** State efforts exhibit greater policy depth and breadth in these two areas and, in some cases, demonstrate observable evidence of positive impact. For instance, there are examples of state data analysis spurring policy action and state consumer protection efforts resulting in action to mitigate or remediate harm to students.

Second, while states are engaging in myriad promising QA activities across the broader range of levers, Bellwether’s research did not surface robust evidence that the activities have been extensive enough to lead to measurable impacts, particularly regarding improved student outcomes or changed institutional behavior. Given the limited capacity to engage in QA efforts, states must balance the tension between monitoring institutions’ compliance with regulations designed to ensure baseline levels of quality and proactively engaging with institutions to shift practices that can support quality improvement. Across conversations with experts and state leaders, there was a sense that existing state QA efforts have been focused to a far greater extent on institutional compliance than on catalyzing quality improvement. To move QA efforts from compliance to improvement, states will need to prioritize the improvement function of QA and shift their activities accordingly. This will require additional resources directed to state regulatory agencies, including increased staffing to support productive engagement with institutions and take stock of current practices leading to demonstrable improvement.

This brief presents examples of state actions, including a summary of findings and reflections on enhancing engagement impact. Actions are presented in thematic groupings that arose from the research, though some could reasonably appear in multiple groupings. The brief concludes with considerations for IHE leaders and policymakers, emphasizing the need for comprehensive research and innovation to improve the effectiveness of these QA mechanisms.

Note: This brief is the final part of Bellwether's three-part series, [Quality Counts](#), examining postsecondary QA. The first brief in the series provides an overview of the program integrity triad responsible for assuring the quality of postsecondary institutions. The second brief introduces a taxonomy and framework for categorizing state postsecondary QA efforts, and uses these tools to discuss, at a high level, how states are engaging in this work. This current brief provides specific examples of state action to monitor and enhance postsecondary quality.

Lever 1: Public Governance Structures

States establish governance structures to guide decision-making, management, and oversight of public IHEs. These structures are the state's most significant postsecondary oversight entities in terms of both longevity and reach (public institutions represented 72% of enrollment in two and four-year IHEs enrollment in fiscal year 2022).⁴ At the state and system levels, there are two main types of postsecondary governance structures: governing boards and coordinating boards or agencies.⁵ Public institutions and systems act within state-established governance structures to support QA by ensuring academic and financial integrity, effective leadership, and support for the postsecondary institution's mission and goals. Specific examples of governance structure actions to support QA are highlighted below.

- **Appoint Higher Education Leaders** — In most states, governing and coordinating boards are responsible for appointing and removing postsecondary education leaders, including state-level postsecondary executive officers, as well as system and institutional presidents. For instance, New York's two governing boards appoint their respective system chancellors, while a legislatively appointed Board Of Regents appoints the Commissioner of Education who oversees the Office of Higher Education within the **New York** State Education Department.⁶
- **Approve Mission Statements** — An essential role of governing and coordinating boards in some states is to approve institutional mission statements and proposed changes. Through this process, boards can prevent mission creep and ensure institutional missions align with the state's goals for the IHE. In **Texas**, the Higher Education Coordinating Board maintains records of the mission statements of public IHEs statewide.⁷ When changes to a mission statement are needed, the institution must first gain approval from its governing board.⁸ Similarly, the **Missouri** Coordinating Board for Higher Education, in consultation with each public four-year IHE's governing board, reviews and approves mission statements every five years.⁹ The review aims to ensure Missouri's IHE system is responsive to state needs and is "focused, balanced, cost-effective, and characterized by programs of high quality as demonstrated by student performance and program outcomes."¹⁰
- **Set and Monitor Progress on Institutional Goals** — System-level governing boards in some states have taken the initiative to set goals and track progress for their constituent institutions. For example, in **North Carolina**, the University of North Carolina Board of Governors routinely sets both target and stretch goals for its 17 institutions through its strategic planning process.¹¹ The goals are meant to "reflect the long-term vision and priorities" of the board as well as include metrics for assessing the performance of the system's chancellor and institutional presidents. In its 2022-2027 strategic plan, the board set 12 institutional goals in five focus areas: Access, Student Success, Affordability and Efficiency, Economic Impact and Community Engagement, and Excellent and Diverse Institutions.¹² The board monitors institutional progress on these goals by tracking changes to defined metrics, such as four-year graduation rates disaggregated by student groups, educational spending per degree, and debt at graduation for first-time and transfer students.¹³

- **Develop and Support Market-Responsive Initiatives** — Governing boards and coordinating boards are responsible for developing and administering academic policies, programs, and initiatives aligned with economic and community needs. In 2023, the **Arizona** Board of Regents announced “AZ Healthy Tomorrow,” a university-led statewide effort to address health care workforce shortages among “physicians, nurses, and other health care professionals.”¹⁴ The board allocated \$30 million — and the governor allocated an additional \$11 million — to support the launch of new medical schools at Arizona State University and Northern Arizona University, to double the number of medical school graduates at the University of Arizona, and to increase the number of nursing and other health care graduates across the system.¹⁵
- **Lead the Redesign of Higher Education Systems** — When state higher education systems undergo a major restructuring processes (like consolidation, explained in Lever 5), the governing or coordinating board is responsible for overseeing effective implementation. In 2022, the Board of Governors of **Pennsylvania’s** State System of Higher Education used its authority through the state’s Act 50 of 2020 to consolidate six system institutions into two regional degree-granting entities.¹⁶ The move was made to bolster the system’s financial sustainability, provide students with more stable postsecondary options, and meet regional economic and workforce needs more effectively. The board consulted with a wide range of stakeholders, conducted a financial review and alignment analysis across all system institutions, and supported the development and integration of two accredited entities, each with a unified leadership team, faculty, staff, academic program array, enrollment strategy, and budget.¹⁷
- **Increase Public Trust Through Transparency and Engagement** — Governing and coordinating boards are responsible for ensuring public trust in state postsecondary education systems. In 2018, the **Tennessee** General Assembly passed the University of Tennessee Focusing on Campus and University Success Act, which converted the existing 27-member university board to one of 12 trustees. At the time of this shift, the system president had fired the president of the flagship institution; legislators had expressed concerns about the quality of the university system; and members of the academic community were concerned that core principles, such as academic freedom and shared governance, were under attack. The new University of Tennessee system board chose to rebuild public trust through direct action. They went on listening tours across the state to gather feedback from students, faculty, staff, alums, legislators, former trustees, and members of the public. This proactive public engagement strategy helped smooth transitions for multiple key leadership positions, including the new system's president.¹⁸

States establish postsecondary governance structures for public IHEs and entrust them with ensuring the value and quality of the educational experience provided by the institutions they oversee. State leaders can further support QA efforts of governance structures by providing a clear vision for higher education in the state as well as legislative and regulatory guidance on expectations for institutional and system-wide performance relative to statewide goals.

States seek to ensure IHEs operating within their borders meet specific quality standards through their authorization and reauthorization processes.

Lever 2: Authorization and Reauthorization

To be eligible for federal student aid programs, IHEs must be authorized by the state. Private and out-of-state IHEs that have a physical presence in a state are usually required to undergo two processes to operate within a state: institutional authorization and reauthorization.¹⁹ In lieu of directly authorizing out-of-state IHEs, some states enter into reciprocity agreements and accept the other state's authorization of individual institutions as valid for serving students within the state.²⁰ Most in-state public IHEs are chartered by their state, which gives them inherent authorization to operate within the state; as a result, they either do not go through the state's authorization and reauthorization processes or go through an expedited process.²¹ Some common state requirements for authorization and reauthorization that support QA are described below.

- Accreditation Requirements** — These requirements serve as a basic QA mechanism by demonstrating to stakeholders that a program meets standards set by an outside entity (the accreditor). Accreditation provides an additional QA layer that supplements the state QA role. Most IHEs already meet this bar to obtain eligibility for federal student aid. State requirements for institutional accreditation aim to ensure the IHE meets established quality and integrity standards within educational programs and operations.²² Accreditation requirements vary by state.²³ Specifically, 16 states require accreditation for both degree-granting and non-degree-granting IHEs, 21 states require accreditation for degree-granting IHEs only, and 11 states do not require accreditation.²⁴ There are further nuances within this requirement. Eight states — Arizona, Colorado, Illinois, New Mexico, Ohio, Rhode Island, Texas, and Washington — require accreditation but also authorize unaccredited IHEs on the condition that they will obtain accreditation within a specific time frame.²⁵ Five states — Maine, Massachusetts, Missouri, South Carolina, and Vermont — do not require accreditation for in-state IHEs but do require it for out-of-state IHEs.²⁶
- Authorization Status Transparency** — States strive to protect residents against entities known as “accreditation mills” and “degree mills” that mislead students and the public about the quality of an IHE and offer illegitimate credentials (Sidebar 1).²⁷ Some states have sought to do this by increasing transparency around which institutions have been authorized to operate in the state.

For example, in **California**, out-of-state, for-profit private postsecondary IHEs that want to operate in the state must register with the state's Department of Consumer Affairs (DCA) Bureau for Private Postsecondary Education (BPPE).²⁸ The DCA BPPE provides a database of approved institutions, which is meant to legitimize that state's IHEs.²⁹ In **Oregon**, the Higher Education Coordinating Commission maintains a list of non-accredited institutions and non-approved accrediting organizations that help students and employers avoid degree mills.³⁰ In **Minnesota**, the state's Office of Higher Education offers resources to validate a school's claims and check if an institution operates legally. These include tips on evaluating online education options and verifying educational opportunities with potential employers before enrolling.³¹

- **State Site Visit Requirements** — Site visits are a critical QA measure because they allow regulators to get an on-the-ground view of institutional action to uphold quality. Institutions are required to undergo site visits in conjunction with accreditation processes; however, the frequency of accreditation site visits varies across different accrediting bodies and programs, and they generally occur once every five to 10 years for programs with continuing accreditation status. To allow more frequent touchpoints to verify programming and monitor quality, some states require site

SIDEBAR 1

What are accreditation mills and degree mills?

Accreditation Mill — An organization that claims to provide educational accreditation to IHEs, but does not have recognition from the federal government to do so. The “accreditation” they provide has no legal or academic value.³²

Degree Mill — Also known as a diploma mill. An organization that claims to be an IHE but is neither accredited by a federally recognized accreditor nor authorized by a state agency. These organizations typically confer academic degrees and diplomas with minimal instruction or academic requirements in exchange for a fee.³³

visits outside the accreditation requirements. For example, a site visit is required in **North Carolina** if an IHE wants to add a campus or a new licensure program.³⁴ In **Colorado**, once IHEs are approved, they must maintain their status through several ongoing activities. This includes participating in the State Board of Education reauthorization process through an on-site evaluation and site visit conducted at least once every five years.³⁵ Colorado also requires the site visits be conducted in the presence of various stakeholders, including candidates, graduates, hiring principals, and program instructors.³⁶

- **Compliance Inspections** — In **California**, the BPPE conducts compliance inspections, which are routine evaluations of private IHEs to ensure they meet the minimum requirements outlined in California’s Education Code.³⁷ The agency carries out two types of inspections, announced and unannounced, for every institution it authorizes. In the announced inspection, the BPPE sends a desk review packet to the IHE, requesting documentation for compliance, such as school catalog requirements, enrollment agreements, annual reports, and advertisements. An inspector then schedules an onsite visit, which includes interviewing students and staff, touring the campus to verify the existence of classrooms and equipment, reviewing policies and records, and following up on the desk review.³⁸ The BPPE also conducts an unannounced inspection after an institution completes its initial announced inspection. An exit briefing is conducted after the visit with the IHE administrator.³⁹ If an IHE has multiple violations, incomplete files, or significant negative testimony, it could lose its approval to operate within the state.
- **Licensure Renewal** — IHEs authorized by the state generally receive a license to operate; subsequent violations of state law or requirements could warrant revocation of that license. All IHEs also need to have their licenses renewed periodically. This involves a comprehensive evaluation process where the institution must provide detailed data on various metrics to the state’s relevant licensing authority. These data are meant to demonstrate the institution’s continued compliance with educational standards and verify its license renewal eligibility. For example, the **District of Columbia** has a multistep licensure renewal process for IHEs where its Higher Education Licensure Commission examines data on the IHE’s characteristics, including human and financial resources, tuition process, accreditation, enrollment, degrees and certificates conferred, student retention, and financial aid. The IHE must report several student metrics on the licensure renewal form, including full-time and part-time enrollment, retention rates, industry-related job placement, and industry-related certificate exam passage rates.⁴⁰ In **Louisiana**, an IHE must submit a renewal form to the Board of Regents that requires several student metrics, including enrollment by degree level, graduation data, student demographic information, and degrees earned. The renewal application also includes sections where the IHE must describe how it compiles and uses data on student retention, graduation rates, and passage rates for professional licenses and certificates.⁴¹

States seek to ensure IHEs operating within their borders meet specific quality standards through their authorization and reauthorization processes. Some states have worked to bolster QA efforts by specifying accreditation requirements, publicly disseminating information about bad actors, and conducting various site visits to institutions beyond what is required to obtain accreditation. States should validate the effectiveness of these measures by collecting quantitative and qualitative outcomes data on students attending these institutions and engaging in frequent dialogue with institutions to determine if there are any causal relationships between actions taken and improved quality. States can use these data to identify and disseminate information on QA best practices based on the results of their ongoing analyses.

State program approval and review processes aim to ensure new programs at public IHEs meet existing gaps in opportunity and that approved programs continue to serve state residents well in attainment and workforce development.

Lever 3: Program Approval and Review

To operate academic programs within a state, public IHEs must undergo two main processes: program approval and review.⁴² Program approval allows states to review and authorize specific academic programs, ensuring that those offerings meet quality standards and serve the state's educational and workforce needs. Program review is intended to be a continuous improvement process for approved programs. It allows states to monitor IHEs and hold them accountable for providing quality programming. Some common program approval and review practices supportive of postsecondary QA are profiled below.

- **Aligning New Programs With Unmet Needs** — When evaluating a new program for approval, states often consider whether it will fill an unmet need. The **Tennessee** Higher Education Commission has statutory authority to review and approve new public IHE degree programs. Tennessee regulations require IHEs proposing new programs to provide documentation demonstrating an associated “student interest, local and regional demand, industry support, and workforce need.”⁴³ The University System of **Georgia** requires an annual report from each of its institutions, including an “academic program forecast of potential new programs.” New programs must be consistent with the college’s mission and “high on the list of academic priorities as delineated in the institution’s strategic plan.”⁴⁴ When applying to the system for program approval, institutions must specify whether a new program was in the institution’s most recent academic program forecast; how the program aligns with local, regional, or state workforce needs; and whether “competing or complementary” programs already exist within the IHE.⁴⁵
- **Periodic Review to Ensure Continued Alignment** — Some states have implemented periodic reviews after initial program approval to ensure their programs continue to align with economic and state needs and provide value to students. In **Illinois**, while each IHE can determine an individual program review process that meets their needs, these processes must align with the Illinois Board of Higher Education's (IBHE) “mechanisms and guidelines.”⁴⁶ Program reviews are conducted on an eight-year cycle, with progress reports required three years after the approval

and implementation of new programs. Reports on program reviews must summarize major changes within the program, including student demand, state need, and the context for offering the program.⁴⁷ Programs flagged by the IHE for priority review — meaning they have board-identified areas for improvement in curricula, assessments, or instructional practices — must develop interim reports that may be sent to IBHE. Institutions that have suspended enrollment for a program based on interim reports must inform IBHE of the program’s status, including any corrective actions they are taking to address board concerns.⁴⁸

- **Using Student Outcomes Data to Update Programs** — In **Maine**, public universities collect several artifacts to measure student learning, including “student course evaluations, portfolios, papers, exams, projects, capstones, rubrics, and surveys of students, graduates, and employers.”⁴⁹ The universities use this data to make changes to their programs. For example, the University of Maine at Presque Isle changed course requirements and sequencing based on student learning outcomes.⁵⁰ The University of Maine at Fort Kent updated its nursing program curriculum based on its student licensure exam passage rates.⁵¹

State program approval and review processes aim to ensure new programs at public IHEs meet existing gaps in opportunity and that approved programs continue to serve state residents well in attainment and workforce development. States often require institutions to provide a variety of student outcome measures, including graduation rates, wage data, and student satisfaction measures. While these metrics offer concrete data on student progress and attainment, there is limited evidence that states have set thresholds for performance on these measures and used this data in meaningful ways to otherwise hold programs accountable. Setting performance thresholds and ensuring data use in driving institutional and program improvement would strengthen the QA value of these processes.

Lever 4: Data Collection, Analysis, and Dissemination

States collect data from IHEs through annual reporting requirements, which commonly include student enrollment, retention, graduation, and employment rates. Collection and analysis of annually reported data allows states to monitor IHE performance, identify areas for improvement, and implement targeted strategies to increase attainment, all of which are critical aspects of QA. While states' approaches in the other QA levers use the data they collect to regulate IHE actions, states have also focused on data dissemination and transparency to help the public and policymakers make informed decisions. The following examples demonstrate different ways states have used data to support postsecondary QA.

- Required Reporting of Student Outcomes** — Many states support public accountability by including student outcomes metrics in their annual reporting requirements for IHEs. In **California**, private IHEs must submit an annual report that includes graduation rates, post-graduation job placement rates, and program costs.⁵² **New York** requires public and private IHEs to report retention, graduation, and transfer data to the state's Higher Education Data System.⁵³
- Data Dashboards to Track Progress** — Several states have funded and implemented data dashboards to track progress toward their attainment goals (Table 2). In **North Carolina**, the myFutureNC Attainment dashboard tracks North Carolina's progress toward its goal of 66% of 25-to-44-year-olds holding a high-quality credential or postsecondary degree by 2030.⁵⁴ While some other statewide dashboards have focused solely on higher education attainment metrics, North Carolina's dashboard tracks several categories of postsecondary metrics including: college and career access, postsecondary completion, and workforce alignment.⁵⁵ In 2024, the **Washington** Student Achievement Council launched a data dashboard that tracks four main metrics aligned with the state's strategic plan and attainment goal: affordability, enrollment, student support, and completion.⁵⁶

TABLE 2: NORTH CAROLINA AND WASHINGTON STATE DATA DASHBOARDS — POSTSECONDARY METRICS

North Carolina	Washington
<ul style="list-style-type: none"> College and Career Access: High school graduation rates, ACT performance, Free Application for Federal Student Aid (FAFSA) completion rate, and postsecondary enrollment rate. Postsecondary Completion: Five-year persistence rate, postsecondary completion rate at two- and four-year IHEs by type. Workforce Alignment: Labor market alignment, percentage of North Carolina 16-to-24-year-olds not in school or working, labor force participation, and family-sustaining wages. 	<ul style="list-style-type: none"> Affordability: FAFSA completion rates for all students and for students who qualify for free and reduced-price meals, average net price of public institutions, need-based financial aid recipients, and average state need-based grant aid. Completion: IHE graduation rates for 150% and 200% of normal time, number of degrees and certificates, retention rates, and the number of 16-to-24-year-olds who have not earned an initial credential. The graduation rates, number of degrees, and adults without an initial certification are disaggregated by race. Enrollment: Undergraduate enrollment, direct enrollment from high schools, adult enrollment, and the percent change in Washington students receiving financial aid. Student Supports: Benefits utilization rate, food insecurity rate, housing insecurity or homelessness rate, share with unreliable access to health care, and share with unreliable access to child care.

- **Wage Data to Support Program Initiatives** — Wage data from program completers can be used to improve the market relevance of programs and credentials. For example, the State Council of Higher Education for **Virginia** (SCHEV) produces an annual report on “Post-Completion Wages,” which includes data on the employment outcomes and earnings of graduates from Virginia’s public and private institutions.⁵⁷ Data from SCHEV’s Post-Completion Wages reports, which highlight a need for skilled workers in specific high-demand fields (e.g., health care support and STEM), supported establishing the New Economy Workforce Credential grant program.⁵⁸ This program funds noncredit workforce training leading to high-demand credentials and aims to align educational outcomes with the labor market.⁵⁹
- **Data-Driven Policy Changes** — In 2023, the **Louisiana** Board of Regents launched a data-based framework for institutional change to serve postsecondary learners better and help achieve the state’s attainment goal.⁶⁰ Built on three foundational strands (equity, resources, and learning mindsets) and four structural threads (choices, pathways, milestones, and engagement), the Board’s “Meauxmentum” Framework uses student success data from across the U.S. to help institutions align policy changes with effective practices.⁶¹ The framework has helped guide the development and implementation of multiple evidence-backed, cross-system and institutional policy changes, including revised admissions criteria, flexible scheduling, guided pathways, and corequisite remediation models.⁶² The state has linked the Meauxmentum Framework to its strategic plan, Louisiana Prospers, and is tracking progress toward its attainment goal through annual Talent Imperative reports.⁶³

Statewide attainment goals are popular; as of January 2024, the governors, legislatures, or college or university systems in 45 states had articulated an attainment goal. However, progress on state-level goal attainment is uneven.⁶⁴ While states often use annual reporting requirements to track progress on goals, it is difficult to find systematic evidence of state leaders using goal-tracking to inform changes in policy or practice. In addition, while states set and track attainment goals statewide, most do not set institution or program-specific targets directly aligned with the state attainment goal, nor do they hold institutions accountable for supporting the state in reaching its attainment goals. More systematic review of these data by decision-makers in recurring policy processes and more meaningful institutional incentives tied to attainment could further augment the QA value of state efforts in this area.

While closures are usually events where states have a clear QA role in protecting students, states consolidate IHEs for reasons beyond assuring or improving quality. However, state leaders could approach consolidation as an opportunity to improve the quality of the education they provide to students.

Lever 5: Consolidation and Closures

More public IHEs have considered consolidating their programs in recent years due to declining enrollment, lower projected numbers of high school graduates, and stagnation or decline in state support.⁶⁵ While cost savings and declining enrollment are usually cited as the main drivers for public IHE consolidation, some states explicitly named academic quality as an added driver. In cases of institutional closure, which are often sudden and happen predominantly in the private, for-profit sector, states play a critical role in assuring that institutions treat exiting students fairly.⁶⁶ A few examples of consolidations and closures with QA goals and impacts are highlighted below.

- **Consolidating to Increase Opportunity and Improve Attainment** — From 2013 to 2018, a significant consolidation effort in **Georgia** reduced the number of public IHEs from 18 to nine. The consolidation allowed some smaller IHEs to offer a broader range of programs and services by combining resources.⁶⁷ The chancellor at the time indicated that students at the consolidated institutions would “see an increase of educational offerings, [both] through traditional classroom delivery and [through] the increased use of distance learning.”⁶⁸ A guiding principle of the consolidation was a dedication to increasing “opportunities to raise students’ educational attainment levels.”⁶⁹ A study of consolidations in the University System of Georgia found an 8% decline in first-year dropout rates and a 29% increase in four-year bachelor’s graduation rates associated with consolidation.⁷⁰
- **Consolidating to Increase Enrollment and Expand Course Options** — In 2022, **Connecticut’s** 12 community colleges were approved by the Connecticut State Colleges and Universities System (CT State) to merge into one college with a dozen campuses.⁷¹ The merger aimed to save costs and improve student outcomes through shared resources and standardized practices.⁷² CT State cites initial data showing that 28% of students in fall 2023 took classes at one or more campuses, compared to fewer than 1% before the consolidation, to indicate the achievement of increased student flexibility in course-taking, a primary goal of the merger.⁷³

- **Consolidation to Support Workforce Needs** — In July 2024, **California** State University (CSU) announced a recommendation to integrate the Cal Maritime Academy and the California Polytechnic State University, San Luis Obispo. The CSU executive vice chancellor and the CSU deputy vice chancellor of academic and student affairs indicated that the integration would “serve industry and workforce needs of the state of California and the nation while also supporting the U.S. economic and national security interests.”⁷⁴
- **Enforcing Student Protection Measures in Case of Closure** — Most institutional closures are sudden and occur in private, for-profit IHEs.⁷⁵ When IHEs close, states are critical in enforcing closure policies. For some states, this involves having additional requirements beyond existing federal regulations. For example, the **California** Bureau for Private Postsecondary Education requires IHEs to maintain records for at least five years after the institution closes.⁷⁶ The **New York** State Education Department bolsters federal closure requirements with additional teach-out requirements, including detailed IHE planning for how the student will be supported and how credits will transfer and additional student notification requirements for financial aid counseling and academic advising.⁷⁷ **California, Nevada, and Oregon** have laws that prohibit enforcement of unpaid enrollment agreements or loans originated by an IHE when it closes without providing a refund.⁷⁸

While closures are usually events where states have a clear QA role in protecting students, states consolidate IHEs for reasons beyond assuring or improving quality. However, state leaders could approach consolidation as an opportunity to improve the quality of the education they provide to students. This could include repurposing resources to evidence-based programming to improve student success, realizing cross-campus efficiencies in facilities to update classrooms or labs, or consolidating programs to regional labor markets where they are most responsive to demand.

Lever 6: Consumer Protection

Protecting students as consumers of postsecondary education against fraud and abuse is a core QA role for states. States enforce general consumer protection laws and those specific to IHEs to ensure students attending postsecondary institutions are treated fairly and have access to accurate information. State attorneys general are called in by state authorities when catastrophic cases of IHE consumer abuse occur. The following examples illustrate state attorneys general action and legislative efforts in postsecondary consumer protection.

- **Attorneys General Investigations, Lawsuits, and Settlements** — Attorneys general seek restitution for students harmed by abusive institutional practices. In 2022, after an investigation and lawsuit by **California's** attorney general, a California court ruled that Ashford University and its parent company, Zovio, misled students about the college's accreditation, costs, and the time it would take to graduate.⁷⁹ The court imposed a \$22.3 million fine, and the U.S. Department of Education canceled \$72 million in student debt for borrowers who attended Ashford University.⁸⁰ In another example, the **Massachusetts** attorney general obtained more than \$1 million in relief for students in 2021 from the for-profit Mildred Elley School for high-pressure enrollment sales tactics and advertising inflated job placement rates.⁸¹
- **Collaboration Across State Attorneys General** — State attorneys general sometimes collaborate when students in multiple states have experienced the same consumer protection violations. For example, in 2019, Career Education Corporation (CEC) agreed to cancel \$494 million in debt for nearly 180,000 students after a group of 49 state attorneys general conducted a five-year investigation.⁸² The attorneys general contended that CEC used predatory and deceptive recruiting tactics by misleading students about program costs and the prospects for its graduates.⁸³
- **Financial Stability Monitoring** — Monitoring institutions' financial stability, above and beyond federal requirements, can provide states with even earlier warning signals regarding institutional viability. In 2019, **Massachusetts** passed a law that allows the Massachusetts Board of Higher Education to monitor the financial stability of statewide colleges more closely to protect students and employees from sudden closures.⁸⁴ Under the law, the board established annual screening procedures to check the financial condition of every college and university in the state.⁸⁵ If a school is at risk of imminent closure, that institution must submit a contingency plan to the Board of Higher Education that includes arrangements for the students to complete their studies.
- **Ethical Marketing Protections** — In 2024, **Minnesota** became the first state to codify a ban on tuition-sharing between its public state colleges and universities and Online Program Management providers (OPMs) when a contract involves recruitment and marketing services.⁸⁶ The Minnesota law contains a specific OPM definition, noting that the law applies to for-profit entities that “provide bundled products and services to develop, deliver, or provide managed programs when the services include recruitment and marketing.” This law serves as a consumer protection measure by prohibiting conflicts of interest and preventing aggressive marketing practices that could mislead students.⁸⁷ It also ensures that academic decisions remain with the IHEs rather than with

profit-driven companies.⁸⁸ To date, several other states have expressed legislative interest in this topic, with **California** and **New Jersey** introducing bills that failed to pass.⁸⁹

- **Performance Quality Standards in Career-Oriented Education** — In 2022, **New Jersey** became the first state to pass legislation to protect students against high-cost career preparation programs that lead to limited earning potential after graduation.⁹⁰ This law, similar to federal Gainful Employment regulations, is designed to protect New Jersey students and state-funded financial aid programs (Sidebar 2). The Institute for College Access and Success praised the passage of the New Jersey law, hailing it as a victory for equity. They stated that without laws of this type, “programs that cost more than they should; burden students of color, low-income students, women, first-generation students, and student veterans with more debt than they can repay; and provide low-quality training” would continue to harm students.⁹¹

State consumer protection laws are designed to safeguard students’ interests. While all states have consumer protection laws, the level of protection provided to students through these laws varies widely across states. To provide additional protections, states have also developed IHE-specific consumer protection laws. In addition to the rules already being implemented, like the financial monitoring in Massachusetts and the outcomes standards in New Jersey, advocates continue to propose various mechanisms that state leaders could implement to generate even more robust and upstream approaches to consumer protection. For instance, state regulatory agencies could

SIDEBAR 2

What is the federal regulation on Gainful Employment, and how does it impact state IHEs?

The federal Gainful Employment rule, finalized by the U.S. Department of Education, aims to ensure educational programs adequately prepare students for employment without burdening them with excessive debt or low wages that leave them worse off financially than if they had never enrolled in the program.⁹² This policy seeks to enhance accountability in higher education and provide students with crucial information for making informed educational choices. This policy primarily affects for-profit institutions and non-degree programs at public and nonprofit schools, though the latest version requires public institutions to report substantial data, and includes transparency for all types of programs.⁹³

The most recent iteration of the rule evaluates programs based on graduates’ debt-to-earnings ratios and their earnings compared to the typical high school graduate’s.⁹⁴ Programs that consistently fail to meet these benchmarks risk losing eligibility for federal financial aid. The rule took effect in July 2024, with the first outcomes data expected to be published in early 2025 and potential loss of federal aid eligibility for failing programs beginning in 2026.⁹⁵

monitor an institution’s instructional spending as a percentage of operating costs to evaluate institutional priorities and determine whether student tuition dollars are being used wisely. States could also add measures of market demand to regulatory requirements, in terms of the percentage of students who choose to enroll in programs without the support of financial aid, using market demand as a proxy for program quality.

State regulatory agencies monitor the quality of IHEs to safeguard their investment in postsecondary education, ensure access to high-value experiences, and protect individuals from fraud and abuse.

Considerations for the Future of State Postsecondary QA

State regulatory agencies monitor the quality of IHEs to safeguard their investment in postsecondary education, ensure access to high-value experiences, and protect individuals from fraud and abuse. State regulatory agencies are taking action across six main levers; however, state actions vary across levers in robustness, effectiveness, and prevalence. For these actions to have an impact on institutional behavior, more states will need to track institutional responses to these actions and set accountability measures directly based on whether institutions follow procedures, obey laws, and ultimately provide value to students and the public. The following considerations elevate a few different paths toward a more robust state role in postsecondary QA.

Engage in Additional QA Research

Additional research on how QA actions and processes affect institutional behavior and student outcomes would be a strong first step toward more rigorous state QA practices. Bellwether's research and analysis revealed that the field lacks a systematic understanding of whether particular state QA actions within the broader levers had their intended results. Sharpening this understanding will help an evolving QA field identify the most promising institutional and program improvement practices and support state agencies in allocating stretched staff capacity more effectively. States can collaborate with practitioners, institutional leaders, program providers, and students to develop a specific QA research agenda around promising levers and a plan for collecting and analyzing the necessary data to translate them into QA practice improvements.

Make Use of Existing Data to Facilitate Improvement

There is general agreement among regulators and practitioners that it is essential to periodically review institutions and programs to maintain their relevance and effectiveness. Regular review processes ensure institutions and programs continue to deliver on their original promises to students and meet the evolving demands of the job market and state economy. However, while state authorities regularly collect student outcomes information during institutional and programmatic reviews, they rarely take action based on this information. As a result, these high-burden activities are often relegated to the status of a compliance exercise. To increase the utility of existing reporting requirements, state regulators could work in concert with policymakers and institutions to identify which metrics are most helpful to assuring quality, limit and reduce the burden of collection for those metrics, specify thresholds for metrics as well as corrective actions and potential consequences, and provide continuous improvement supports to institutions and programs.

Address Capacity Constraints

Interviews with state QA officials revealed that while they are well attuned to the needs and opportunities of doing more to support QA improvement within their respective domains, they need more human capacity.⁹⁶ There are various steps state QA officials can take to begin to tackle this prevalent concern. A first step could be to figure out how to free up capacity by determining which QA tasks or processes might lend themselves to automation and where state agencies could draw upon available resources, such as existing state data systems, to reduce staff burdens. Next, agency staff could strategize where to reallocate time to higher-leverage institutional improvement activities, enumerate the future challenges they might avert by making these shifts, and what it would take to move their workload in that direction. In addition to directly alleviating capacity pressures, both steps would support state leaders in building a case for allocating additional resources or staffing in service of more robust QA practices.

Develop Communities of Practice

Bellwether's desk research and expert interviews revealed concerns about the limited scope and rigor of existing state approaches within and across QA levers and a lack of visibility across states and national experts about current state action and experimentation. Purposefully facilitated peer-to-peer networks of QA regulators could help to build a shared knowledge base and support explicit efforts to design levers with greater nuance and potential impact. State regulators could work with their counterparts in other states and with accreditors and federal agency representatives to develop a collaborative network to share and develop best practices. These communities of practice could create centralized spaces to share and codify resources and organize training to address common challenges.

Facilitate Greater Intrastate Collaboration

During Bellwether’s interviews, state leaders regularly reflected that catastrophic events with significant student impacts were often the only catalysts that brought together regulatory agencies, attorneys general, institutions, and others within the state QA apparatus to engage in collaborative efforts. Instead, state leaders could be more proactive in developing structures for QA regulators to collaborate before catastrophic events arise. For example, state leaders could set an expectation that state regulatory agencies, attorneys general, and IHEs convene regularly to examine institutional data from various sources, including annual reporting, accreditation visits, and attainment goal tracking, to identify and resolve emerging areas of risk. They could also establish differential levels of scrutiny and regulatory action based on the indicators they observe. More comprehensively, states could establish independent agencies as unified spaces to collectively address regulatory review, enforcement, and legal action across institutional sectors, types, or other considerations such as financial or operational risk. Such agencies could specifically focus on accountability and improvement for identified higher-risk IHEs. This could alleviate capacity issues and support more rigorous QA activities at the state level by streamlining operations to achieve a common goal.

Conclusion

Across the country, states can improve their QA efforts by researching student outcomes, identifying and disseminating best practices through communities of practice, rigorously monitoring academic programs, addressing capacity constraints, and facilitating greater intrastate collaboration across state quality assurance authorities. In concert, these state-level actions could support more robust institutional QA, student consumer protection, and continuous improvement of the postsecondary ecosystem. ✨

Endnotes

- 1 Bellwether includes the District of Columbia and all U.S. territories in its definition of “state.”
- 2 “Higher Education Expenditures | State and Local Backgrounders,” Urban Institute, <https://www.urban.org/policy-centers/cross-center-initiatives/state-and-local-finance-initiative/state-and-local-backgrounders/higher-education-expenditures#Question4Higher>.
- 3 The six state QA levers are described in detail in brief 2 of the Quality Counts series, “State Levers for Postsecondary Quality Assurance,” <https://bellwether.org/publications/quality-counts/>.
- 4 Aims McGuinness, “State Policy Leadership for the Future: History of State Coordination and Governance and Alternatives for the Future” (Education Commission of the States, May 2016), <https://www.ecs.org/wp-content/uploads/051616-State-Policy-Leadership-for-the-Future-KL-final4-1.pdf>; “Number of students enrolled in postsecondary institutions in the fall, by sector of institution and level of student: 2022” (National Center for Education Statistics), <https://nces.ed.gov/ipeds/TrendGenerator/>.
- 5 For more information about the distinctions between governing and coordinating boards, see brief 2 of the Quality Counts series, “State Levers for Postsecondary Quality Assurance,” <https://bellwether.org/publications/quality-counts/>.
- 6 “Education Law, Rules and Regulations,” New York State Education Department, <https://www.nysed.gov/college-university-evaluation/education-law-rules-and-regulations>; Mary Fulton, “An Analysis of State Postsecondary Governance Structures,” (Education Commission of the States, October 2019), <https://www.ecs.org/an-analysis-of-state-postsecondary-governance-structures/>.
- 7 “Mission Statements for Public Universities & Health-Related Institutions,” *Texas Higher Education Coordinating Board* (blog), <https://www.highered.texas.gov/our-work/supporting-our-institutions/institutional-resources/other-institutional-resources/mission-statements-for-public-universities-and-health-related-institutions/>.
- 8 Ibid.
- 9 “Program Approval Process Workgroup Missions Chart,” General Assembly of Maryland Department of Legislative Services, https://dls.maryland.gov/pubs/prod/NoPblTabMtg/PrgAppProWrkgrp/04-Out_of_State_Missions_Chart.pdf.
- 10 Ibid.
- 11 “Strategic Plan,” UNC System, <https://www.northcarolina.edu/impact/strategic-plan/>.
- 12 “Higher Expectations: University of North Carolina System Strategic Plan for 2022-2027” (The University of North Carolina System, 2022), <https://www.northcarolina.edu/wp-content/uploads/unc-system-2022-strategic-plan.pdf>.
- 13 “UNC System 2022-2027 Strategic Plan Metric Definitions and Change Log,” UNC System, <https://www.northcarolina.edu/wp-content/uploads/strategic-plan-metric-definitions-and-change-log.pdf>.
- 14 “Arizona Board of Regents Announces University-Led Statewide Effort to Address Critical Health Care Workforce Shortages,” Arizona Board of Regents, June 1, 2023, <https://azregents.edu/news-releases/arizona-board-regents-announces-university-led-statewide-effort-address-critical>.
- 15 “AZ Healthy Tomorrow,” Arizona Board of Regents, <https://www.azregents.edu/azhealthytomorrow>; “Governor Katie Hobbs Announces \$11 Million for AZ Healthy Tomorrow Initiative, Boosting Investment in Strengthening Arizona’s Healthcare Workforce,” Office of the Arizona Governor, September 29, 2023, <https://azgovernor.gov/office-arizona-governor/news/2023/09/governor-katie-hobbs-announces-11-million-az-healthy-tomorrow>; “Arizona Board of Regents announces university-led statewide effort to address critical health care workforce shortages.” Arizona Board of Regents, June 1, 2023. <https://azregents.edu/news-releases/arizona-board-regents-announces-university-led-statewide-effort-address-critical>.
- 16 Curtis Sonney, “Bill Information - House Bill 2171; Regular Session 2019-2020,” <https://www.legis.state.pa.us/cfdocs/billinfo/billinfo.cfm?sYear=2019&slnd=0&body=H&type=B&bn=2171>; Parish, Marley, “Pa. State System Unanimously moves to consolidate six schools into regional campuses.” *Pennsylvania Capital-Star*, July 14, 2021. <https://penncapital-star.com/education/pa-state-system-unanimously-moves-to-consolidate-six-schools-into-regional-campuses/>.
- 17 “Integration FAQs,” PA State System of Higher Education, <https://www.passhe.edu/system-redesign/integrations-faqs.html>; “AGB Announces Six Higher Education Governing Boards Selected to Receive 2022 John W. Nason Award for Board Leadership,” AGB, January 26, 2022, <https://agb.org/news/press-releases/agb-announces-six-higher-education-governing-boards-selected-to-receive-2022-john-w-nason-award-for-board-leadership/>; Parish, Marley, “Pa. State System Unanimously moves to consolidate six schools into regional campuses.” *Pennsylvania Capital-Star*, July 14, 2021. <https://penncapital-star.com/education/pa-state-system-unanimously-moves-to-consolidate-six-schools-into-regional-campuses/>; Sweitzer, Justin, “The learning curveball: Officials at PASSHE have embarked on a groundbreaking – and fraught – quest to redesign the system.” *City and State Pennsylvania*, April 26, 2022. <https://www.cityandstatepa.com/policy/2022/04/learning-curveball-officials-passhe-have-embarked-groundbreaking-and-fraught-quest-redesign-system/366131/>.
- 18 Christopher Connell, “The 2021 John Nason Award Winners,” *Trusteeship March*/April 2021 (2021): 48, https://www.nxtbook.com/nxtbooks/agb/trusteeship_03042021/index.php#p/48; <https://news.tennessee.edu/2021/01/14/ut-board-of-trustees-named-recipient-of-2021-nason-award-agb/>.
- 19 “State Authorization 101,” WICHE Cooperative for Educational Technologies, <https://wcetsan.wiche.edu/state-authorization-101>.

- 20 For example, 49 states and the District of Columbia are currently participating in a shared reciprocity agreement with respect to postsecondary education provided through distance and online technologies; “State Authorization Reciprocity Agreement (SARA),” Department of Education, [https://www.education.pa.gov:443/Postsecondary-Adult/CollegeCareer/Pages/State-Authorization-Reciprocity-Agreement-\(SARA\).aspx](https://www.education.pa.gov:443/Postsecondary-Adult/CollegeCareer/Pages/State-Authorization-Reciprocity-Agreement-(SARA).aspx); “State Authorization Reciprocity Agreements Policy Manual” (National Council for State Authorization Reciprocity Agreements, December 8, 2023), https://nc-sara.org/sites/default/files/files/2023-12/SARA_Policy_Manual_231_blackline_12-08-23.pdf.
- 21 Connell, “The 2021 John Nason Award Winners.”; Aims C. McGuinness, Jr., “State Higher Education Structures and Institutional Accreditation: Background Information for Consideration of Alternatives for the Future” (National Center for Higher Education Management Systems, March 2021), <https://nchems.org/wp-content/uploads/EducationStructuresAndInstitutionalAccreditationAimsMcGuinness.pdf>.
- 22 Alexandra Hegji, “An Overview of Accreditation of Higher Education in the United States,” *Congressional Research Service*, April 12, 2024, <https://crsreports.congress.gov/product/pdf/R/R43826>.
- 23 “Accreditation & Recognition: State Licensed or Authorized Institutions,” Council for Higher Education Accreditation, <https://www.chea.org/state-licensed-or-authorized-institutions>; Hegji, “An Overview of Accreditation of Higher Education in the United States.”
- 24 David A. Tandberg, Ellie M. Bruecker, and Dustin D. Weeden, “Improving State Authorization: The State Role in Ensuring Quality and Consumer Protection in Higher Education” (SHEEO, July 2019), https://sheeo.org/wp-content/uploads/2019/07/SHEEO_StateAuth.pdf.
- 25 Ibid.
- 26 Ibid.
- 27 “Important Questions About Degree Mills,” Council for Higher Education Accreditation, <https://www.chea.org/important-questions-about-degree-mills/>; “Diploma & Accreditation Mills,” ABET, <https://www.abet.org/accreditation/what-is-accreditation/why-abet-accreditation-matters/diploma-accreditation-mills/>.
- 28 “Out-of-State Institution Registration,” State of California | Bureau for Private Postsecondary Education, June 25, 2024, https://www.bppe.ca.gov/schools/outofstate_reg.shtml.
- 29 Ibid.
- 30 “Accreditation & Recognition: State Licensed or Authorized Institutions,” Council for Higher Education Accreditation.
- 31 Ibid.
- 32 “Diploma & Accreditation Mills,” ABET; “Important Questions about Degree Mills,” Council for Higher Education Accreditation. <https://www.chea.org/important-questions-about-degree-mills>.
- 33 “What Is a Diploma or Degree Mill?,” GetEducated, <https://www.geteducated.com/college-degree-mills-what-they-are-a-how-they-work/>.
- 34 “400.4.1.1[R], Regulation Governing Review of Licensure for Nonpublic Postsecondary Institutions Proposing to Open Additional Campuses or Sites in North Carolina to Offer Degree Programs That Have Been Previously Licensed by the Board of Governors,” The UNC Policy Manual, April 5, 2018, <https://www.northcarolina.edu/apps/policy/doc.php?id=192>; “400.4.1.3[R], Regulation on Procedures for Licensure,” The UNC Policy Manual, June 9, 2022, <https://www.northcarolina.edu/apps/policy/doc.php?id=194>.
- 35 “Institutes of Higher Education Guidelines: Supporting Traditional Educator Preparation Pathways” (Colorado Department of Education, November 2017), <https://www.cde.state.co.us/cdeprof/ihguidelines>.
- 36 Ibid.
- 37 “Compliance Inspections,” State of California | Bureau for Private Postsecondary Education, <https://www.bppe.ca.gov/enforcement/compliance.shtml>.
- 38 “Announced Compliance Inspection,” State of California | Bureau for Private Postsecondary Education, https://www.bppe.ca.gov/enforcement/announced_compliance.shtml.
- 39 “Unannounced Compliance Inspection,” State of California | Bureau for Private Postsecondary Education, https://www.bppe.ca.gov/enforcement/unannounced_compliance.shtml.
- 40 “Application for Renewal of Higher Educational License,” Higher Education Licensure Commission, <https://helc.osse.dc.gov/topic/HELCAAdmin/institutions/application-for-renewal-of-higher-educational-license>.
- 41 “Renewal License Application: Postsecondary Institutions Academic Degree-Granting 2023” (Board of Regents State of Louisiana, 2023), https://www.laregents.edu/wp-content/uploads/2023/01/ACT129_RenewalApplication_2023.pdf.
- 42 Monoka Venters, “State-Level Program Approval and Review” (SHEEO, September 2021), https://sheeo.org/wp-content/uploads/2021/09/SHEEO_ProgApp.pdf.
- 43 “New Academic Programs: Approval Process,” Academic Policies (Tennessee Higher Education Commission, 2024), https://www.tnstate.edu/academic_affairs/documents/THC%20A1.0%20New%20Program%20Approval%20Policy_Final%20Jan%202024.pdf.
- 44 “Academic & Student Affairs Handbook | 2.3.2 New Academic Programs,” University System of Georgia, September 22, 2021, https://www.usg.edu/academic_affairs_handbook/section2/C733.
- 45 “Academic Programs | New Program Proposal Forms and Resources,” University System of Georgia, https://www.usg.edu/academic_programs/new_program_proposal_forms_and_resources.
- 46 “Guidelines for Review of Existing Units of Instruction, Research, and Public Service at Public Institutions” (Illinois Board of Higher Education), <https://www.ibhe.org/assets/files/ProgramReviewGuidelines.pdf>.
- 47 Ibid.
- 48 Ibid.

- 49 “Standard Eight: Educational Effectiveness,” Unified Accreditation (Maine’s Public Universities | University of Maine System), <https://www.maine.edu/unified-accreditation/self-study/standard-eight-educational-effectiveness/>.
- 50 Ibid.
- 51 Ibid.
- 52 “Annual Reports,” State of California | Bureau for Private Postsecondary Education, <https://www.bppe.ca.gov/annual-report/>.
- 53 “Higher Education Data Collection and Reporting,” New York State Education Department, <https://www.nysed.gov/information-reporting-services/higher-education-data-collection-and-reporting>.
- 54 “About the Data,” NC Educational Attainment Dashboard | MyFutureNC, <https://dashboard.myfuturenc.org/about-the-data/>; “States with Higher Education Attainment Goals,” Strategy Labs: State Policy to Increase Higher Education Attainment (Lumina Foundation, January 12, 2024), https://www.luminafoundation.org/stronger-nation/report/static/States_with_Higher_Education_Attainment_Goals.pdf.
- 55 “About the Data,” NC Educational Attainment Dashboard | MyFutureNC.
- 56 “Announcement: New Data Dashboard Tracks Washington’s Education Attainment Progress,” Washington Student Achievement Council, March 19, 2024, <https://wsac.wa.gov/announcement-2024-03-19-SAP-Dashboard>; “SAP Dashboard,” Washington Student Achievement Council, <https://wsac.wa.gov/sap-dashboard>.
- 57 “The Virginia Plan for Higher Education: 2023 Annual Report Summary,” Virginia State Council Of Higher Education, VA, <https://www.schev.edu/research-publications/strategic-plan/annual-report>; “Home Page for SCHEV Policy Analytics Higher Education Data Website,” State Council of Higher Education for Virginia (SCHEV), <https://research.schev.edu/>.
- 58 “Workforce Credential Grant,” Virginia State Council Of Higher Education, VA, <https://www.schev.edu/financial-aid/financial-aid/federal-state-financial-aid/workforce-credential-grant>; “Workforce Credential Grant,” Virginia Career Works, <https://virginiacareerworks.com/workforce-credential-grant/>; “Guide to the Post-Completion Wages of Graduates,” State Council of Higher Education for Virginia (SCHEV), <https://research.schev.edu/info/Reports.Guide-to-the-Post-Completion-Wages-of-Graduates>.
- 59 “New Economy Workforce Credential Grant,” Virginia State Council Of Higher Education, VA, <https://www.schev.edu/institutions/grants/new-economy-workforce-credential>.
- 60 “Louisiana’s Got Talent: Bringing Meauxmentum to the National Stage,” NASH, September 18, 2023, <https://nash.edu/2023/09/louisianas-got-talent/>.
- 61 “Meauxmentum Framework,” Louisiana Board of Regents, <https://www.laregents.edu/meauxmentum-framework/>.
- 62 “Seizing the Meauxment for Statewide Education Attainment in Louisiana,” The EvoLLLution, November 16, 2023, <https://evollution.com/seizing-the-meauxment-for-statewide-education-attainment-in-louisiana>.
- 63 “Louisiana Prospers: Driving Our Talent Imperative” (Louisiana Board of Regents, September 2022), <https://www.laregents.edu/wp-content/uploads/2022/09/Full-Report-FINAL.pdf>; “Louisiana Prospers: Driving Our Talent Imperative,” Louisiana Board of Regents, <https://www.regents.la.gov/page/619>.
- 64 The Lumina Foundation, which tracks states’ progress toward the specific attainment goal of 60% of residents completing a postsecondary degree or credential, found that only five states had achieved that goal by 2022: Colorado, the District of Columbia, Massachusetts, Minnesota, and Utah. “States with Higher Education Attainment Goals.”
- 65 Lee Gardner, “More States Are Looking at Consolidating Their Public Colleges. Does It Work?,” The Chronicle of Higher Education, July 30, 2020, <https://www.chronicle.com/article/more-states-are-looking-at-consolidating-their-public-colleges-does-it-work>.
- 66 Rachel Burns, Lynneah Brown, Kelsey Heckert, Dustin Weeden, Hee Sun Kim, Beatrix Randolph, Aaron Pevitz, Sarah Karamarkovich, and Jennifer Causey, “A Dream Derailed? Investigating The Impacts Of College Closures On Student Outcomes” (SHEEO, 2022), https://sheeo.org/wp-content/uploads/2022/11/SHEEO_NSCRC_CollegeClosures_Report1.pdf.
- 67 “Eight USG Institutions Recommended for Consolidation,” University System of Georgia, January 5, 2012, https://www.usg.edu/news/release/eight_usg_institutions_recommended_for_consolidation; Paul Fain, “Major Mergers in Georgia,” Inside Higher Ed, January 5, 2012, <https://www.insidehighered.com/news/2012/01/06/georgia-university-system-proposes-consolidation-8-campuses>; The Editorial Board, “Consolidation Shouldn’t Be a Dirty Word for Public Universities,” The Boston Globe, April 28, 2024, <https://www.bostonglobe.com/2024/04/28/opinion/public-college-consolidation-state-universities-massachusetts/>.
- 68 Fain, Paul, “Major Mergers in Georgia,” Inside Higher Ed, January 5, 2012, <https://www.insidehighered.com/news/2012/01/06/georgia-university-system-proposes-consolidation-8-campuses>.
- 69 Sosanya Jones, “A Georgia Case Study: A Look at the University System Consolidations with an Eye Towards Race, Ethnicity, and Equity,” *Ithaca S+R*, August 30, 2021, <https://sr.ithaka.org/publications/a-georgia-case-study/>.
- 70 Lauren Russell, “Better Outcomes without Increased Costs? Effects of Georgia’s University System Consolidations,” *Economics of Education Review* 68 (February 1, 2019): 122–35, <https://doi.org/10.1016/j.econedurev.2018.12.006>.
- 71 Sara Weissman, “‘Audacious’ Merger or ‘One-Size-Fits-All’ Mistake?,” Inside Higher Ed, March 8, 2022, <https://www.insidehighered.com/news/2022/03/09/accreditor-approves-connecticut-community-colleges-merger>.
- 72 The Editorial Board, “Consolidation Shouldn’t Be a Dirty Word for Public Universities.”
- 73 “Progress Report to the New England Commission of Higher Education” (Connecticut State Community College, January 15, 2024), <https://ctstate.edu/images/Forms-Documents/NECHE/CT-State-Progress-Report-January-2024-final.pdf>.

- 74 "CSU Recommends Integrating Cal Maritime and Cal Poly at San Luis Obispo," The California State University, June 5, 2024, <https://www.calstate.edu/csu-system/news/Pages/cal-poly-maritime-integration.aspx>.
- 75 Burns et al., "A Dream Derailed? Investigating The Impacts Of College Closures On Student Outcomes."
- 76 Cal. Code Regs. Tit. 5, § 71930, <https://www.law.cornell.edu/regulations/california/5-CCR-71930>.
- 77 N.Y. Educ. Law § 5006, <https://casetext.com/statute/consolidated-laws-of-new-york/chapter-education/title-6-special-schools-and-instruction/article-101-licensed-private-career-schools-and-certified-english-as-a-second-language-schools/section-5006-teachout-plans>.
- 78 Cal. Educ. Code § 94917, https://california.public.law/codes/ca_educ_code_section_94917; Nev. Ann. Rev. Stat. § 394.590(2), https://nevada.public.law/statutes/nrs_394.590; Wash. Rev. Code Ann. § 28C.10.180, <https://apps.leg.wa.gov/RCW/default.aspx?cite=28C.10>.
- 79 The People of the State of California, Plaintiff and Respondent, v. Ashford University, LLC, et al., Defendants and Appellants., No. D080671 (Court Of Appeal, Fourth Appellate District Division One State Of California February 20, 2024), <https://oag.ca.gov/system/files/attachments/press-docs/Ashford%20.pdf>; Collin Binkley, "US Government Cancels Loans for Former Ashford University Students and Plans to Recoup Costs," AP News, August 30, 2023, <https://apnews.com/article/student-debt-loans-cancellation-asford-borrower-c4c7e9f1d7d1c88c9bb7c6ea1c708cdd>; "Attorney General Bonta Celebrates Latest Win Upholding \$21 Million Penalty against Ashford University for Defrauding Students Nationwide," State of California - Department of Justice - Office of the Attorney General, February 20, 2024, <https://oag.ca.gov/news/press-releases/attorney-general-bonta-celebrates-latest-win-upholding-21-million-penalty>.
- 80 *The People of the State of California*, No. D080671; "Attorney General Bonta Celebrates Latest Win Upholding \$21 Million Penalty against Ashford University for Defrauding Students Nationwide."; Binkley, "US Government Cancels Loans for Former Ashford University Students and Plans to Recoup Costs."
- 81 "AG Healey Secures Over \$1 Million in Relief for Students Under Settlement With For-Profit School in Pittsfield," Mass. gov, November 8, 2021, <https://www.mass.gov/news/ag-healey-secures-over-1-million-in-relief-for-students-under-settlement-with-for-profit-school-in-pittsfield>; Nate Raymond, "Student Loan Servicer Agrees to Borrower Relief in Massachusetts Settlement," Reuters, February 9, 2021, <https://www.reuters.com/article/us-massachusetts-studentloans/student-loan-servicer-agrees-to-borrower-relief-in-massachusetts-settlement-idUSKBN2A92TA/?il=0>.
- 82 Stacy Cowley, "For-Profit Chain Cancels \$494 Million in Student Debt to End State Investigations," *The New York Times*, January 3, 2019, sec. Business, <https://www.nytimes.com/2019/01/03/business/student-debt-career-education-corporation.html>.
- 83 Ibid.
- 84 Casey Leins, "Massachusetts Gov. Baker Signs Law Protecting Students From Sudden College Closures," U.S. News & World Report, November 15, 2019, <https://www.usnews.com/news/best-states/articles/2019-11-15/massachusetts-gov-baker-signs-law-protecting-students-from-sudden-college-closures>.
- 85 Ibid.
- 86 Julia Pasette, "First State Passes Law to Ban Tuition Sharing with OPMs," Whiteboard Advisors, May 30, 2024, <https://whiteboardadvisors.com/minnesota-ban-tuition-sharing-opms/>.
- 87 Jeremy Bauer-Wolf, "OPM Watch: How Minnesota Became the First State to Restrict Tuition-Share Deals," *New America* (blog), July 17, 2024, <http://newamerica.org/education-policy/edcentral/opm-watch-how-minnesota-became-the-first-state-to-restrict-tuition-share-deals/>.
- 88 Ibid.
- 89 Ibid.
- 90 Jeremy Bauer-Wolf, "New Jersey Law Creates Gainful Employment Standards for Career-Oriented College Programs," Higher Ed Dive, August 2, 2022, <https://www.highereddive.com/news/new-jersey-law-creates-gainful-employment-standards-for-career-oriented-col/628664/>.
- 91 Sameer Gadkaree, "Re: NJAC 9A:7--PQS Proposal," December 1, 2023, <https://ticas.org/wp-content/uploads/2024/02/TICAS-NJ-Rule-Comments-12.1.23.pdf>.
- 92 "Financial Value Transparency and Gainful Employment: List of Approved Classification of Instructional Program (CIP) Codes for Qualifying Graduate Programs," Federal Student Aid | Knowledge Center, June 28, 2024, <https://fsapartners.ed.gov/knowledge-center/library/federal-registers/2024-07-08/financial-value-transparency-and-gainful-employment-list-approved-classification-instructional-program-cip-codes-qualifying-graduate-programs>; "Biden-Harris Administration Announces Landmark Final Rules to Protect Consumers from Unaffordable Student Debt and Increase Transparency," U.S. Department of Education, September 27, 2023, <https://www.ed.gov/news/press-releases/biden-harris-administration-announces-landmark-final-rules-protect-consumers-unaffordable-student-debt-and-increase-transparency>.
- 93 Ibid.
- 94 Laura Dawson Ullrich and Stephanie Norris, "Gainful Employment Take One: Motivation, History, and the Reality of the New Rules," Richmond Fed, March 22, 2024, https://www.richmondfed.org/region_communities/regional_data_analysis/surveys/community_college/community_college_insights/2024/gainful_employment_20240322; Katherine Knott, "Game On, Again, for Gainful Employment," Inside Higher Ed, September 27, 2023, <https://www.insidehighered.com/news/government/student-aid-policy/2023/09/27/education-department-finalizes-gainful-employment>.
- 95 Ibid.
- 96 Rebecca S Natow, Vikash Reddy, and Victoria Ioannou, "How States Respond to Federal Policy on State Authorization for Higher Education: Findings From a Multi-Case Study," July 2021, https://sheeo.org/wp-content/uploads/2021/07/Natow-et-al._SHEEO-Federal_Policy_on_State_Authorization.pdf.

About the Authors



KRISTA KAPUT

Krista Kaput is a senior analyst at Bellwether in the Policy and Evaluation practice area. She can be reached at krista.kaput@bellwether.org.



SHARMILA MANN

Sharmila Mann is an associate partner at Bellwether in the Policy and Evaluation practice area. She can be reached at sharmila.mann@bellwether.org.



NICK LEE

Nick Lee is a partner at Bellwether in the Policy and Evaluation practice area. He can be reached at nick.lee@bellwether.org.

About Bellwether

Bellwether is a national nonprofit that exists to transform education to ensure systemically marginalized young people achieve outcomes that lead to fulfilling lives and flourishing communities. Founded in 2010, we work hand in hand with education leaders and organizations to accelerate their impact, inform and influence policy and program design, and share what we learn along the way. For more, visit bellwether.org.

ACKNOWLEDGMENTS

We would like to thank the many experts who gave their time and shared their knowledge with us to inform our work, including those at the State Higher Education Executive Officers Association and the Western Interstate Commission for Higher Education and its Cooperative for Educational Technologies. Thank you also to Arnold Ventures for its financial support of this project.

We would also like to thank our Bellwether colleagues Ebony Lambert for her input and Alexis Richardson for her support. Thank you to Amy Ribock, Kate Neifeld, Andy Jacob, Zoe Campbell, Julie Nguyen, Mandy Berman, and Amber Walker for shepherding and disseminating this work, and to Super Copy Editors.

The contributions of these individuals and entities significantly enhanced our work; however, any errors in fact or analysis remain the responsibility of the authors.



© 2024 Bellwether

- © This report carries a Creative Commons license, which permits noncommercial reuse of content when proper attribution is provided. This means you are free to copy, display, and distribute this work, or include content from this report in derivative works, under the following conditions:
- ① **Attribution.** You must clearly attribute the work to Bellwether and provide a link back to the publication at www.bellwether.org.
- ⑧ **Noncommercial.** You may not use this work for commercial purposes without explicit prior permission from Bellwether.
- ③ **Share Alike.** If you alter, transform, or build upon this work, you may distribute the resulting work only under a license identical to this one.

For the full legal code of this Creative Commons license, please visit www.creativecommons.org. If you have any questions about citing or reusing Bellwether content, please contact us.