

# South Carolina Commission on Higher Education

Brig Gen John L. Finan, USAF (Ret.), Chair  
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Mr. Hood Temple  
  
Dr. Richard C. Sutton  
Executive Director

CAAL  
01/08/2015  
Agenda Item 3

January 8, 2015

## MEMORANDUM

**TO:** Dr. Bettie Rose Horne, Chair, and Members, Committee on Academic Affairs and Licensing  
**FROM:** MaryAnn Janosik, Ph.D., Director, Academic Affairs

### **Presentation of Information Requested by Commissioners to Address Specific Action Items on the 2014-15 CHE Strategic Agenda**

Over the past few months, Commissioners have raised questions about several critical issues facing higher education in South Carolina. Among those topics were tuition and program costs, assessing program productivity, and monitoring non-public institutions. At its November 6, 2014 CHE meeting, Commissioners asked the Academic Affairs staff to prepare information for presentation at the January 8, 2015 Committee on Academic Affairs and Licensing (CAAL) meeting that would assist CAAL members in determining future recommendations to the Commission regarding some of the action items included in the Commission's 2014-15 Strategic Agenda.

Specifically, issues raised by the Commission reference action items included in four of the targeted strategic objectives. Information included for this agenda item has been arranged according to each targeted objective and the appropriate action items.

## APPENDIX I

**TARGETED OBJECTIVE #1:** Improve Monitoring and Assessment of Academic Programs and Student Services at SC Public Colleges and Universities

**ACTION ITEM A:** Establish performance metrics and outcomes measures for assessment of programs

**ACTION ITEM B:** Redirect CHE staffing and resources to focus on performance metrics of academic programs approved in past five years

Information regarding the monitoring of academic programs at SC public colleges and universities uses current data from program productivity reports and shows the results if current data is 1) expanded, or 2) strengthened. For example, the first chart in Appendix IA shows what happens if we expand the criteria for determining if program productivity has been met to include **both** enrollment **and** completion rates instead of the current enrollment **or** completion rate standard.

In the second and third charts included in Appendix IA, we have strengthened the rigor of program completion rates for baccalaureate degrees by raising the number of graduates first from five (5) to eight (8), and then from five (5) to ten (10), projecting the results using the either/or (enrollment or completion) and both (enrollment and completion) scenarios.

Staff did not initiate gathering of new data or the creation of new benchmarks. Rather, we examined various outcomes expanding or strengthening existing data. Some of the information Commissioners recommended we collect (i.e., default rate by program) could be costly and require colleges and universities to invest additional resources in an area that might not yield helpful results, given the mobility of undergraduate students in and out of various degree programs. Other suggested data, like seat capacity per course per institution, can be made available but, again, would take considerable time and resources to complete and may not enhance the desired results (i.e., a more robust review of what it means to have met productivity standards).

Within the charts provided, we have tried to capture what we currently do, as well as to imagine what the program productivity report would look like if we adopted standards used by other states (i.e., higher numbers for degree completion). At the same time, we've tried to show how a simple revision of benchmarks might impact the assessment of academic program monitoring.

Finally, Appendix IB provides two examples of how academic programs offered at non-public post-secondary institutions are reported. Current licensing regulations contain no requirements for productivity reporting by licensed institutions but include a statement that periodic reports "shall comply with procedures defined by the Commission." (SC Reg. 62-24) The Commission may want to consider establishing more uniform benchmarks for publics and non-publics.

As part of its license renewal application or annual report to the Commission, an institution must provide a list of the programs for which the institution is licensed, plus enrollment by site and program for the year indicating enrollments, completions, and student-teacher ratios. Staff provides, as part of the annual report request, a document (Appendix IIIA) that the institution may use to report these numbers, or the institution may submit an annual report for accreditation or other oversight agency that contains the same. Appendix IB shows how Emory Riddle used CHE's form for reporting program information, while DeVry University used its own template for reporting program productivity.

Licensed institutions self-report enrollment and completion numbers for a period of time as determined by the institution to align with its annual reporting cycle. In addition, institutions participating in Title IV must report enrollment, completion, and other data to the U.S. Department of Education through the Integrated Postsecondary Education Data System (IPEDS). However, many of the licensed institutions are allowed to submit their data as an aggregate (for example, ECPI's data is reported through its Virginia Beach main campus, rather than by each SC-based campus). This form of reporting makes it difficult to compare data between licensed institutions and other institutions operating in the state.

## **APPENDIX II**

**TARGETED OBJECTIVE #2:** Strengthen Existing and/or Develop New Funding Models to Sustain Public Higher Education in South Carolina

**ACTION ITEM A:** Engage the legislatively mandated Efficiency Studies Review Committee in seeking systemic approaches to higher education cost savings and economies

**ACTION ITEM B:** Seek state appropriations to encourage funding innovations by institutions that increase college affordability for students

**ACTION ITEM C:** Seek executive, legislative, and institutional support for adherence to statutory requirements of 59-103-35

**TARGETED OBJECTIVE #3:** Align SC's Higher Education Resources to Meet Current and Future Needs of the State Most Effectively and Efficiently

**ACTION ITEM A:** Initiate a study of SC's higher education resources with recommendations to identify their most effective deployment in support of state needs

**ACTION ITEM C:** Work with partner agencies and organizations to integrate workforce needs assessment into long-term statewide planning

Information regarding tuition cost overlaps action items found in Targeted Objectives 2 and 3, and the materials included are meant to stimulate a discussion of potential strategies for South Carolina in strengthening and sustaining higher education resources.

The first two items, Appendix IIA and IIB, are recent studies published in *The Chronicle of Higher Education* (November 13, 2014). The first examines cost imposed on students in addition to tuition; the second charts tuition and fees at South Carolina institutions (not comprehensive, but including those independent and non-public institutions who opted to participate).

Appendix IIC identifies initiatives taken by select regional states to address both the high cost of tuition and competition from non-public institutions.

**APPENDIX III**

**TARGETED OBJECTIVE #5:** Strengthen Monitoring and Assessment of Non-Public Post-Secondary Institutions Operating in SC

**ACTION ITEM A:** Establish performance metrics and outcome measures for assessment of programs at non-public institutions

**ACTION ITEM B:** Redirect CHE staffing and resources to focus on performance metrics of programs at non-public institutions approved in past five years

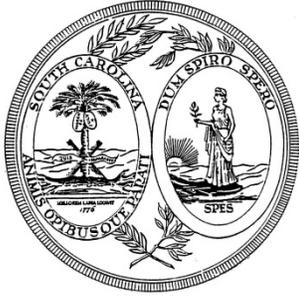
Information regarding the monitoring of non-public institutions includes the four basic criteria used in licensing non-public post-secondary institutions (IIIA), a list of required exhibits for initial degree-granting licensure (IIIB), and a chart identifying suggested areas for statutory and regulatory change (IIIC).

South Carolina's statute and regulations governing non-public post-secondary institutions can be found at the following links:

Link to Statutes: [http://www.che.sc.gov/CHE\\_Docs/AcademicAffairs/License/LicensingStatute.pdf](http://www.che.sc.gov/CHE_Docs/AcademicAffairs/License/LicensingStatute.pdf)

Link to Regulations: [http://www.che.sc.gov/CHE\\_Docs/AcademicAffairs/License/Regulations2012.pdf](http://www.che.sc.gov/CHE_Docs/AcademicAffairs/License/Regulations2012.pdf)

The Academic Affairs staff respectfully submits this information for review and as a starting point for discussion among CAAL members. We will await further direction from CAAL in gathering and preparing additional information and analysis.



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## Summary of the Program Productivity Policy

In 2002, the South Carolina Commission on Higher Education adopted a policy to determine satisfactory academic program productivity which provides for the biennial review and presentation of enrollment and degrees awarded in all degree programs by all public four-year colleges and universities in South Carolina. The policy is available on the Commission's website:

[http://www.che.sc.gov/CHE\\_Docs/AcademicAffairs/Prog\\_Productivity\\_Policies\\_11-2002.pdf](http://www.che.sc.gov/CHE_Docs/AcademicAffairs/Prog_Productivity_Policies_11-2002.pdf)

In order to satisfy the Commission's review, all academic degree programs are required **either** to meet an average enrollment threshold over the most recent five-year period, **or** to produce an average number of degrees awarded over the same five-year period. This required average varies by degree level, (e.g., bachelor's, master's, etc.). The table below, *Average Student Requirement*, provides the specific enrollment or graduation requirement for each degree level. The doctoral level separates the specific benchmarks for the two types of doctoral degrees: professional practice vs. research (Ph.D.).

Average Student Requirement (for enrollment and graduation by degree level)		
Degree Level	Enrollment	Completions
Bachelor's	12.5	5
Master's/Post-Master's/Specialist	6	3
Doctoral (Professional Practice, e.g., DNP, Ed.D., M.D.)	6	3
Doctoral (Research/Scholarship, e.g., Ph.D., DMA)	4.5	2

CHEMIS (Commission on Higher Education Management information System) and the Commission's *Academic Degree Program Inventory* are the sources of data for this review. Academic degree programs that meet **at least one of the two productivity standards** automatically receive continuing approval status from the Commission. Programs which fail to meet *both* the enrollment and degree completion criteria for the biennial review are placed on probation (i.e., provisional approval status), recommended for termination, or, in very rare circumstances, exempted from program productivity standards. Institutions may on their own initiative decide to terminate underperforming programs of study at any time by notifying the Commission on Higher Education.

Chart 1: Program Productivity Using Five Year Average Data (Enrollment and Completions)*					
		Current Model		Model A	
		For all degree levels, meet enrollment <u>or</u> completion standard (using 5 as completion standard at Bachelor's level).		For all degree levels, meet enrollment <u>and</u> completion standards (using 5 as completion standard at Bachelor's level).	
Institution	Degree Programs Reviewed	Met	Unmet	Met	Unmet
Clemson University	162	153	9	144	18
Citadel, The	32	30	2	26	6
Coastal Carolina University	36	36	0	33	3
College of Charleston	59	58	1	54	5
Francis Marion University	32	30	2	24	8
Lander University	25	23	2	20	5
Medical University of SC	26	24	2	22	4
South Carolina State	54	51	3	40	14
U.S.C. Aiken	21	20	1	17	4
U.S.C. Beaufort	11	11	0	9	2
U.S.C. Columbia	222	202	20	177	45
U.S.C. Upstate	28	28	0	23	5
Winthrop University	60	59	1	56	4
<b>Grand Total</b>	<b>768</b>	<b>725</b>	<b>43</b>	<b>645</b>	<b>123</b>
<b>Percentage</b>	<b>N/A</b>	<b>94%</b>	<b>6%</b>	<b>84%</b>	<b>16%</b>
*Time Period for Enrollment: Fall 2008-2012; Time Period for Completions: 2007/08-2011/12 (Academic Year Fall, Spring, Summer)					
<b>Current Program Productivity Standards (Five-Year Averages)</b>					
<b>Degree Level</b>	<b>Enrollment</b>	<b>Completions</b>			
Bachelor's	12.5	5			
Master's/Post-Master's/Specialist	6	3			
Doctoral (Professional Practice, i.e., DNP, Ed.D., M.D.)	6	3			
Doctoral (Research/Scholarship, i.e., Ph.D., DMA)	4.5	2			

Chart 2: Program Productivity Using Five Year Average Data (Enrollment and Completions)\*

		Current Model		Model A		Model B	
		For all degree levels, meet enrollment <u>or</u> completion standard (using 5 as completion standard at Bachelor's level).		For all degree levels, meet enrollment <u>or</u> completion (using 8 as completion standard at Bachelor's level).		For all degree levels, meet enrollment <u>and</u> completion standards (using 8 as completion standard at Bachelor's level).	
Institution	Degree Programs Reviewed	Met	Unmet	Met	Unmet	Met	Unmet
Clemson University	162	153	9	153	9	142	20
Citadel, The	32	30	2	30	2	24	8
Coastal Carolina University	36	36	0	36	0	31	5
College of Charleston	59	58	1	58	1	52	7
Francis Marion University	32	30	2	30	2	20	12
Lander University	25	23	2	23	2	16	9
Medical University of SC	26	24	2	24	2	22	4
South Carolina State	54	51	3	51	3	33	21
U.S.C. Aiken	21	20	1	20	1	16	5
U.S.C. Beaufort	11	11	0	11	0	8	3
U.S.C. Columbia	222	202	20	202	20	172	50
U.S.C. Upstate	28	28	0	28	0	21	7
Winthrop University	60	59	1	59	1	50	10
<b>Grand Total</b>	<b>768</b>	<b>725</b>	<b>43</b>	<b>725</b>	<b>43</b>	<b>607</b>	<b>161</b>
<b>Percentage</b>	<b>N/A</b>	<b>94%</b>	<b>6%</b>	<b>94%</b>	<b>6%</b>	<b>82%</b>	<b>21%</b>

\*Time Period for Enrollment: Fall 2008-2012; Time Period for Completions: 2007/08-2011/12 (Academic Year Fall, Spring, Summer)

**Chart 3: Program Productivity Using Five Year Average Data (Enrollment and Completions)\***

		Current Model		Model A		Model B	
		For all degree levels, meet enrollment <u>or</u> completion standard (using 5 as completion standard at Bachelor's level).		For all degree levels, meet enrollment <u>or</u> completion standard (using 10 as completion standard at Bachelor's level).		For all degree levels, meet enrollment <u>and</u> completion standards (using 10 as completion standard at Bachelor's level).	
Institution	Degree Programs Reviewed	Met	Unmet	Met	Unmet	Met	Unmet
Clemson University	162	153	9	153	9	140	22
Citadel, The	32	30	2	30	2	24	8
Coastal Carolina University	36	36	0	36	0	28	8
College of Charleston	59	58	1	58	1	50	9
Francis Marion University	32	30	2	30	2	18	14
Lander University	25	23	2	23	2	13	12
Medical University of SC	26	24	2	24	2	22	4
South Carolina State	54	51	3	51	3	29	25
U.S.C. Aiken	21	20	1	20	1	15	6
U.S.C. Beaufort	11	11	0	11	0	7	4
U.S.C. Columbia	222	202	20	202	20	168	54
U.S.C. Upstate	28	28	0	28	0	21	7
Winthrop University	60	59	1	59	1	48	12
<b>Grand Total</b>	<b>768</b>	<b>725</b>	<b>43</b>	<b>725</b>	<b>43</b>	<b>583</b>	<b>185</b>
<b>Percentage</b>	<b>N/A</b>	<b>94%</b>	<b>6%</b>	<b>94%</b>	<b>6%</b>	<b>76%</b>	<b>24%</b>

\*Time Period for Enrollment: Fall 2008-2012; Time Period for Completions: 2007/08-2011/12 (Academic Year Fall, Spring, Summer)



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## Productivity Monitoring for Licensed Institutions

Current licensing regulations contain no requirements for productivity reporting by licensed institutions but include a statement that periodic reports “shall comply with procedures defined by the Commission....” As part of its license renewal application or annual report to the Commission, an institution must provide a list of the programs for which the institution is licensed, plus enrollment by site and program for the year indicating enrollments, completions, and student-teacher ratios. Staff provides as part of the annual report request a document (attached) that the institution may use to report these numbers, or the institution may submit an annual report for accreditation or other oversight agency that contains the same.

Licensed institutions self-report enrollment and completion numbers for a period of time as determined by the institution to align with its annual reporting cycle. In addition, institutions participating in Title IV must report enrollment, completion, and other data to the U.S. Department of Education through the Integrated Postsecondary Education Data System (IPEDS). However, many of the licensed institutions are allowed to submit their data as an aggregate (for example, ECPI’s data is reported through its Virginia Beach main campus, rather than by each SC-based campus). This form of reporting makes it difficult to compare data between licensed institutions and other institutions operating in the state.



### **DeVry University - South Carolina Renewal FY 2014**

SC Residents Enrolled in undergraduate programs at select DeVry Locations and SC DeVry Graduate Students

Campus	Award Level	Program	Continuing Students	New Students	Grads	Drops	Still Enrolled	Total Enrollment
FL Miramar	Associate	Electronics & Computer Tech	1	0	1	0	0	1
	<b>Associate Total</b>		<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
	Bachelor	Computer Information Systems	0	1	0	1	0	1
		Multimedia Design & Developmnt	0	1	0	1	0	1
	<b>Bachelor Total</b>		<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>
<b>FL Miramar Total</b>			<b>1</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>3</b>
FL Orlando	Associate	Network Systems Administration	1	0	1	0	0	1
	<b>Associate Total</b>		<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
	Bachelor	Computer Information Systems	1	0	0	1	0	1
		Technical Management	1	0	1	0	0	1
<b>Bachelor Total</b>		<b>2</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>2</b>	
<b>FL Orlando Total</b>			<b>3</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>3</b>
GA Alpharetta	Bachelor	Computer Information Systems	2	0	0	1	1	2
		Game & Simulation Programming	1	0	0	1	0	1
	<b>Bachelor Total</b>		<b>3</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>3</b>
<b>GA Alpharetta Total</b>			<b>3</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>3</b>
GA Decatur	Associate	Accounting	1	0	0	0	1	1
		Health Information Technology	2	1	1	1	1	3
		Web Graphic Design	1	0	0	1	0	1
	<b>Associate Total</b>		<b>4</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>5</b>
	Bachelor	Business Administration	2	1	2	1	0	3
		Computer Engineering Tech	0	1	0	1	0	1
		Electronics Engineering Tech	2	0	1	0	1	2
		Game & Simulation Programming	2	0	1	1	0	2
		Justice Administration	2	0	0	1	1	2
		Technical Management	2	1	1	0	2	3
<b>Bachelor Total</b>			<b>10</b>	<b>3</b>	<b>5</b>	<b>4</b>	<b>4</b>	<b>13</b>
<b>GA Decatur Total</b>		<b>14</b>	<b>4</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>18</b>	
IL Addison	Associate	Accounting	8	6	2	6	6	14
		Electronics & Computer Tech	9	13	1	16	5	22
		Health Information Technology	35	50	7	31	47	85
		Network Systems Administration	7	10	0	9	8	17
		Web Graphic Design	2	5	0	5	2	7
	<b>Associate Total</b>		<b>61</b>	<b>84</b>	<b>10</b>	<b>67</b>	<b>68</b>	<b>145</b>
	Bachelor	Business Administration	71	54	7	55	63	125
		Communications	2	5	0	5	2	7
		Computer Engineering Tech	1	0	0	0	1	1
Computer Information Systems		22	19	1	20	20	41	

	Electronics Engineering Tech	4	1	0	4	1	5
	Engineering Technlgy-Computers	4	9	0	6	7	13
	Engineering Technlgy-Elctrnics	19	21	0	25	15	40
	Game & Simulation Programming	3	1	0	3	1	4
	Healthcare Administration	5	17	0	13	9	22
	Justice Administration	10	14	0	14	10	24
	Management	7	2	3	1	5	9
	Multimedia Design & Developmnt	13	8	1	14	6	21
	Network & Comm Management	15	8	3	11	9	23
	Technical Management	55	54	16	40	53	109
	<b>Bachelor Total</b>	<b>231</b>	<b>213</b>	<b>31</b>	<b>211</b>	<b>202</b>	<b>444</b>
	Grad Certificate						
	Educational Leadership	0	1	0	1	0	1
	<b>Grad Certificate Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
	Master						
	Education	2	0	0	0	2	2
	Educational Technology	1	0	1	0	0	1
	<b>Master Total</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>3</b>
<b>OH Addison Total</b>		<b>295</b>	<b>298</b>	<b>42</b>	<b>279</b>	<b>272</b>	<b>593</b>
<b>OH Columbus</b>							
	Associate						
	Health Information Technology	1	0	1	0	0	1
	<b>Associate Total</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
	Bachelor						
	Business Administration	1	0	0	1	0	1
	<b>Bachelor Total</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
<b>OH Columbus Total</b>		<b>2</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>2</b>
<b>Grand Total</b>		<b>318</b>	<b>304</b>	<b>52</b>	<b>291</b>	<b>279</b>	<b>622</b>

# THE CHRONICLE OF HIGHER EDUCATION

November 13, 2014

## Forget the Rise in Tuition and Fees, What About Living Expenses?

<http://chronicle.com/article/Forget-the-Rise-in-Tuition-and/149649/>



D.L. Turner, Michigan State U.

Michigan State U.'s estimated "cost of attendance" includes all-you-can-eat meals at a campus dining facility like the Vista at Shaw.

By Beckie Supiano

Rising tuition will be in the news this week with the College Board's release on Thursday of its two signature reports.

"Trends in College Pricing" and "Trends in Student Aid" are packed with numbers, but if history is any guide, the one thing people will want to know is how much tuition and fees went up this year.

All right, all right, I'll tell you. Average published tuition and fees rose 2.9 percent for in-state students at public four-year colleges, and 3.7 percent at private nonprofit four-years institutions. You can read the full reports [here](#) and explore individual colleges' prices [here](#).

But tuition is not the whole story. Consider this: The average list price of tuition and fees for in-state students at public four-year colleges in 2014-15 is \$9,139. Room and board charges for the same students? Those come to \$9,804.

Living expenses are an "under discussed" aspect of college affordability, says Zakiya Smith, a strategy director at the Lumina Foundation, who held a private convening of experts to talk about them earlier this fall. Ms. Smith has been pondering living expenses lately, partly because of the handful of new "free college" efforts designed to cover tuition and fees, but nothing more.

Whether and how living expenses should be considered part of the price of college is a matter of some debate. And when it comes to how colleges estimate what students will spend on room, board, and other expenses, and the implications of those estimates, things get really interesting.

### **Part of the Price Tag?**

Everyone agrees that college students must live somewhere, eat something, and have other basic needs met. But is paying for those things part of paying for college?

States often design their financial-aid programs so that the money must go to tuition and fees rather than living expenses, says Debbie Cochrane, research director at the Institute for College Access and Success. The tendency is to trust institutions more than individuals. "There's this sense," she says, "if we give it to students, who knows how they're going to spend it?"

Part of the issue is how students in different situations are typically perceived. "We've all heard people express concerns about people taking out loans to live or to pay rent," Ms. Cochrane says. You don't hear that when students borrow to live in their college's dormitory or buy its meal plan.

"Trends in College Pricing" says many living expenses "are not really part of the cost of attending college, but are expenses people face whether or not they are in school."

Even so, the report does examine them. Why? "Because students tend to think of living expenses as part of the cost of going to college, and because they must come up with the funds to cover these outlays, it is useful to use these expenses as a proxy for forgone earnings."

In other words, the big expense of going to college is the opportunity cost. Hours spent studying and going to class are hours that can't be spent working. The report doesn't try to measure opportunity cost, instead using living expenses as an estimate of what that cost would be.

That approach avoids making "student" a special status. "While we have to make sure that we are supportive of students' needs to meet their living costs while they're in school, we have to think about this in the larger context of a society where lots of people face this, students and others," says Sandy Baum, the report's lead author.

And there could be unintended consequences of "creating the situation where the only chance is to be a student or otherwise they won't have the money to live," adds Ms. Baum, a senior fellow at the Urban Institute and research professor at the George Washington University Graduate School of Education and Human Development.

Public benefits are meant to help people who can't afford to pay for food, housing, or other basic needs. But getting access to them can be challenging for students, says Amy Ellen Duke-Benfield, a senior policy analyst with the Center for Law and Social Policy. The center is running a pilot project in which community colleges work to help students get the benefits they are eligible for. But maintaining eligibility while enrolled is another issue.

Welfare, for instance, has a work requirement—one that federal law says can be fulfilled for 12 months by full-time postsecondary enrollment, Ms. Duke-Benfield explains. But only a handful of states allow recipients to meet their work requirements that way for more than 12 months. And even within that period, most states make students work at least 20 hours per week to stay eligible—a requirement that can slow or even stop their progress through college.

Whether the support comes from financial aid or public benefits, Ms. Duke-Benfield says, students need more resources. "If we're serious about the completion agenda," she says, "that means that we have to care about low-income students. And that means we have to deal with the fact there is an opportunity cost involved for them to go to college."

That opportunity cost is often underestimated, says Sara Goldrick-Rab, a professor of educational-policy studies and sociology at the University of Wisconsin at Madison. Imagine a student who goes from working full time to working part time so he can attend college. Working part time doesn't just mean working fewer hours. It also usually means lower hourly pay and, in many cases, unpredictable or inflexible hours.

"You experience more than a one-to-one loss for each hour," she says. Paying for degrees students will be able to actually finish, Ms. Goldrick-Rab says, means supporting their living expenses.

### **Estimating Cost of Living**

The financial-aid system is based on the understanding that students face expenses beyond tuition and fees. Colleges come up with a figure for their cost of attendance—the sum of tuition, fees, room, board, books, and more.

Cost of attendance is an estimate, one that matters for a couple of reasons. First, it is used to determine a student's financial need (the expected family contribution, the amount that students and their families are deemed able to pay, is subtracted from the cost of attendance to determine need). Second, it's used to determine a college's net price as defined by the federal government—an increasingly important metric.

So how do colleges come up with the number? Rick Shipman, director of financial aid at Michigan State University, walked me through his system.

At Michigan State, the amount for "room" is the price of the average double room on the campus. "Board" is a meal plan that provides all-you-can-eat food during dining-hall hours. Mr. Shipman could elect to use different amounts for students who live off

campus, but he does not. In East Lansing, Mich., he says, prices are comparable, on campus and off.

After adding tuition, fees, room and board, and books, it gets more complicated. "You get to decide as an institution which things you're going to count and how to count them," Mr. Shipman says.

For example, Michigan State's cost of attendance includes money to cover a bus pass, but not to maintain a car, because there is a good public-transportation system in town.

It's important that colleges help families understand the cost of attendance, Mr. Shipman says. They should know that the amount budgeted for books is just an estimate. And they could decide not to spend everything the college has included in the budget. "The degree to which you clarify what these things are helps them understand whether that's something they want to borrow for," Mr. Shipman says.

What families do with that information largely depends on their finances, Mr. Shipman says. High-income students may well bring a car to the campus and pay for off-campus parking. Lower-income students often work hard to keep their spending in line with the budget the college has come up with.

"It does change the bottom-line notion of what it costs to go to school," Mr. Shipman says, "if \$5,000 is spending money."

Prices, of course, tend to rise. But increasing the budget for living expenses is no small matter for a college. Increases in tuition are typically paired with increases in financial aid. Increases in living expenses, though, are often simply absorbed by students. So in estimating those costs, colleges must find an amount large enough for students to live on but low enough that it won't lead them to take on unnecessary debt.

"The reality is also that cost-of-attendance budgets are political," Ms. Cochrane says. Low-balling living expenses makes a college look more affordable. That matters more

now that net prices (the cost of attendance minus average grant aid) are gaining steam as a consumer tool and accountability metric.

### **Same City, Varying Expenses**

It's clear that different colleges interpret living expenses differently. A quick look at the costs of attendance that various colleges report to the government in the Integrated Postsecondary Education Data System shows a great deal of variation in what colleges in the same city budget for housing and food, particularly for students living off campus. The Association of Community College Trustees raised that issue in a letter to the Department of Education detailing its concerns about the proposed college-rating system.

"Until the department gets a grasp on how they adjudicate cost of living, they can't use net price as the mechanism to be transparent," says Jee Hang Lee, the association's vice president for public policy and external relations.

In a recent paper, Ms. Goldrick-Rab and two co-authors examined the relationship between what colleges budget for living expenses and what data in the MIT Living Wage Calculator suggest it costs to live where those colleges are. The researchers found substantial gaps. Instead of allowing colleges to come up with their own cost-of-living budgets, those figures should be standardized, Ms. Goldrick-Rab says. Colleges could still adjust for unusual situations.

Financial-aid administrators are fond of the adage "live like a student now, so you don't have to later." But what that means—and how much help students get in making things work—depends on where they enroll.

**Chronicle of Higher Education, November 13, 2014  
Tuition and Fees, 2014-15, South Carolina Institutions**

<b>Institution</b>	<b>State</b>	<b>Type</b>	<b>Room and board</b>	<b>In-state tuition</b>	<b>In-state total</b>	<b>Out-of-state tuition</b>	<b>Out-of-state total</b>
Aiken Technical College	SC	Public 2-year	--	\$5,046	\$5,046	\$12,578	\$12,578
Anderson University (S.C.)	SC	Private 4-year	\$8,674	\$23,750	\$32,424	\$23,750	\$32,424
Benedict College	SC	Private 4-year	\$8,104	\$18,286	\$26,390	\$18,286	\$26,390
Bob Jones University	SC	For-profit 4-year	\$6,090	\$14,220	\$20,310	\$14,220	\$20,310
Central Carolina Technical College	SC	Public 2-year	--	\$4,800	\$4,800	\$8,280	\$8,280
Charleston Southern University	SC	Private 4-year	\$9,000	\$22,800	\$31,800	\$22,800	\$31,800
Clafin University	SC	Private 4-year	\$8,420	\$15,010	\$23,430	\$15,010	\$23,430
Clemson University	SC	Public 4-year	\$8,370	\$13,546	\$21,916	\$31,562	\$39,932
Clinton Junior College	SC	Private 2-year	\$8,705	\$6,370	\$15,075	\$6,370	\$15,075
Coastal Carolina University	SC	Public 4-year	\$8,440	\$10,050	\$18,490	\$23,390	\$31,830
Coker College	SC	Private 4-year	\$7,830	\$25,536	\$33,366	\$25,536	\$33,366
College of Charleston	SC	Public 4-year	\$11,127	\$10,878	\$22,005	\$27,868	\$38,995
Columbia College (S.C.)	SC	Private 4-year	\$7,200	\$27,350	\$34,550	\$27,350	\$34,550
Columbia International University	SC	Private 4-year	\$7,310	\$19,480	\$26,790	\$19,480	\$26,790
Converse College	SC	Private 4-year	\$9,500	\$16,500	\$26,000	\$16,500	\$26,000
Denmark Technical College	SC	Public 2-year	\$3,808	\$2,734	\$6,542	\$5,158	\$8,966
Erskine College	SC	Private 4-year	\$10,105	\$32,110	\$42,215	\$32,110	\$42,215
Florence-Darlington Technical College	SC	Public 2-year	--	\$4,880	\$4,880	\$7,490	\$7,490
Forrest College	SC	For-profit 2-year	--	\$7,350	\$7,350	\$7,350	\$7,350
Francis Marion University	SC	Public 4-year	\$7,256	\$9,738	\$16,994	\$19,004	\$26,260
Furman University	SC	Private 4-year	\$11,204	\$44,668	\$55,872	\$44,668	\$55,872
Golf Academy of America (S.C.)	SC	For-profit 2-year	--	\$15,750	\$15,750	\$15,750	\$15,750
Greenville Technical College	SC	Public 2-year	--	\$5,060	\$5,060	\$10,490	\$10,490
Horry-Georgetown Technical College	SC	Public 2-year	--	\$3,854	\$3,854	\$6,726	\$6,726
Lander University	SC	Public 4-year	\$7,984	\$10,148	\$18,132	\$19,738	\$27,722
Limestone College	SC	Private 4-year	\$7,800	\$23,000	\$30,800	\$23,000	\$30,800
Midlands Technical College	SC	Public 2-year	--	\$4,856	\$4,856	\$14,036	\$14,036

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Morris College	SC	Private 4-year	\$5,028	\$11,282	\$16,310	\$11,282	\$16,310
Newberry College	SC	Private 4-year	\$9,300	\$24,300	\$33,600	\$24,300	\$33,600
North Greenville University	SC	Private 4-year	\$9,180	\$15,510	\$24,690	\$15,510	\$24,690
Northeastern Technical College	SC	Public 2-year	--	\$4,650	\$4,650	\$7,920	\$7,920
Orangeburg-Calhoun Technical College	SC	Public 2-year	--	\$4,820	\$4,820	\$7,532	\$7,532
Piedmont Technical College	SC	Public 2-year	--	\$4,885	\$4,885	\$7,075	\$7,075
Presbyterian College	SC	Private 4-year	\$9,344	\$34,828	\$44,172	\$34,828	\$44,172
South Carolina State University	SC	Public 4-year	\$9,402	\$10,088	\$19,490	\$19,856	\$29,258
Southern Wesleyan University	SC	Private 4-year	\$7,950	\$22,800	\$30,750	\$22,800	\$30,750
Spartanburg Community College	SC	Public 2-year	--	\$3,964	\$3,964	\$8,108	\$8,108
Spartanburg Methodist College	SC	Private 2-year	\$8,250	\$16,075	\$24,325	\$16,075	\$24,325
Technical College of the Lowcountry	SC	Public 2-year	--	\$5,050	\$5,050	\$10,990	\$10,990
The Citadel	SC	Public 4-year	\$6,381	\$12,568	\$18,949	\$32,176	\$38,557
Tri-County Technical College	SC	Public 2-year	--	\$4,815	\$4,815	\$10,710	\$10,710
Trident Technical College	SC	Public 2-year	--	\$3,942	\$3,942	\$7,434	\$7,434
University of South Carolina at Aiken	SC	Public 4-year	\$7,110	\$9,602	\$16,712	\$18,926	\$26,036
University of South Carolina at Beaufort	SC	Public 4-year	\$7,310	\$9,404	\$16,714	\$19,424	\$26,734
University of South Carolina at Columbia	SC	Public 4-year	\$9,362	\$11,158	\$20,520	\$29,440	\$38,802
University of South Carolina at Lancaster	SC	Public 2-year	--	\$6,686	\$6,686	\$16,130	\$16,130
University of South Carolina at Sumter	SC	Public 2-year	--	\$6,736	\$6,736	\$16,180	\$16,180
University of South Carolina at Union	SC	Public 2-year	--	\$6,686	\$6,686	\$16,130	\$16,130
University of South Carolina-Salkehatchie	SC	Public 2-year	--	\$6,686	\$6,686	\$16,130	\$16,130

**Chronicle of Higher Education, November 13, 2014  
Tuition and Fees, 2014-15, South Carolina Institutions**

Institution	State	Type	Room and board	In-state tuition	In-state total	Out-of-state tuition	Out-of-state total
University of South Carolina-Upstate	SC	Public 4-year	\$7,682	\$10,518	\$18,200	\$20,868	\$28,550
Voorhees College	SC	Private 4-year	\$7,346	\$10,780	\$18,126	\$10,780	\$18,126
W.L. Bonner College	SC	Private 4-year	\$2,576	\$8,868	\$11,444	\$8,868	\$11,444
Williamsburg Technical College	SC	Public 2-year	--	\$3,756	\$3,756	\$7,260	\$7,260
Winthrop University	SC	Public 4-year	\$7,930	\$13,812	\$21,742	\$26,738	\$34,668
Wofford College	SC	Private 4-year	\$10,730	\$37,120	\$47,850	\$37,120	\$47,850
York Technical College	SC	Public 2-year	--	\$4,870	\$4,870	\$10,990	\$10,990

About the Data: If an institution charges in-state and out-of-state residents the same rate, the amount is repeated in the "Out-of-state" columns so that readers can sort institutions accordingly. Many institutions, including most community colleges, do not offer room and board. In those cases, the "Total" columns repeat the tuition and fees figure.

The figures represent charges to first-time, full-time undergraduates based, typically, on a nine-month academic year of 30 semester hours or 45 quarter hours. The data do not reflect the cost of attendance at an institution after grants and other student aid are considered. That net cost is lower than the published fees shown. Room-and-board fees charged by colleges may represent differing numbers of meals per week and so may not be comparable among institutions.

Historical data are in real dollars by default, but can be adjusted for inflation, based on Bureau of Labor Statistics national figures, using the toggle button in the expanded historical view.

The College Board collected the figures for 2014-15 in its "Annual Survey of Colleges 2014." © 2014, the College Board. This material may not be copied, published, rewritten, or redistributed without permission. For more information on these data, contact the College Board at [collegesurvey@collegeboard.org](mailto:collegesurvey@collegeboard.org)

### Higher Education Marketing Campaigns

State	Initiative	Funding
<b>North Carolina</b>	Statewide aspirational campaign promoting public colleges and universities spanning multiple media formats (TV, radio, billboard, etc.) coordinated by a marketing firm.	\$2-5 million per year
<b>Georgia</b>	Statewide campaign to communicate and promote the strengths of the University System of Georgia (public service announcements and small-scale advertising); campaign also leveraged/ forged partnerships with business/industry (had businesses promoting public higher education). Campaign spread across many different media: radio, television, billboards, print media, etc.	\$500,000 to \$1 million per year (no longer active)
<b>Kentucky</b>	Project Graduate – a marketing campaign to target the 11,000 adults with 90 or more credit hours to encourage them to return to college to finish their degree. The Council developed a strong brand identity for Project Graduate, a customizable direct mail campaign, and a website that identified participating institutions and their incentives and special services. Campaign addressed prospective students' concerns/interests and incorporated real-life photos and testimonials (engaging stories that directly speak to the main challenges of adults) using direct (e.g., postcards sent to potential students) and mass media options. See, for example, <a href="http://cpe.ky.gov">http://cpe.ky.gov</a> .	\$ 170,000 – 270,000 per year for 2008-2009 (funded mostly by a grant from the Lumina Foundation); on-going costs unknown
<b>Virginia</b>	Virginia has a website to assist consumers in making a decision about attending college that includes information about degree programs, financial aid, student debt, post-completion wages, etc. See <a href="http://research.schev.edu/">http://research.schev.edu/</a> .	No dedicated marketing funds
<b>Alabama</b>	Alabama developed "Study in Alabama" <b>WHEN?</b> to encourage out-of-state students and international students to pursue higher education in Alabama. Campaign uses branding strategies to promote higher education study in Alabama and involves colleges and universities, business, and industry.	Information not available.

Op-Ed Contributor |NYT Now

# Blowing Off Class? We Know

By GOLDIE BLUMENSTYK DEC. 2, 2014



Credit Dan Bejar

THE stuff some colleges know right now about their students, thanks to data-mining of their digital footprints, boggles the mind. It may even seem a bit creepy.

Has their attendance slipped? Have they stopped logging in to read course packets or file assignments? Did they just drop the very class they needed for their major?

Tools developed in-house and by a slew of companies now give administrators digital dashboards that can code students red or green to highlight who may be in academic trouble. Handsome “heat maps” — some powered by apps that update four times a day — can alert professors to students who may be cramming rather than keeping up. As part of a broader effort to measure the “campus engagement” of its students, Ball State University in Indiana goes so far

as to monitor whether students are swiping in with their ID cards to campus-sponsored parties at the student center on Saturday nights.

The university has taken to heart studies that say that students who are more engaged with college life are also more likely to graduate. When a student's card-swipe patterns suggest she's stopped showing up for clubs or socials, a retention specialist will follow up with a call or an email to see how she's doing.

Ball State is also tracking ID card swipes at the career center and student-leadership programs. It even put out a mobile app this fall for the 1,200 low-income freshmen who qualify for Pell Grants. The app rewards students with points based on the activities that the university monitors. They can redeem these points for merchandise at the campus bookstore. A quarter of eligible students are taking part. Ball State shorts are the most popular item.

Big Brother-esque? Perhaps. But these "big data" developments have the potential to cut the cost of higher education for students and their families, as well as for taxpayers.

Deployed properly, the tools could help millions of low-income students navigate the academic and financial hurdles that often derail first-generation college students. A new University Innovation Alliance of 11 large public universities is seeking to do just that. The alliance, announced in September and backed by a half-dozen major foundations, will use data analytics in its first set of projects, which are aimed at improving graduation rates for needy students.

For a book I just wrote about the higher-education crisis in America, I've explored many of the sector's most pressing problems and proposed innovations. The use of big data is showing many of the most tangible results.

With its seven-year-old eAdvisor system, Arizona State University was a data-analytics early adopter. The 82,000-student university credits eAdvisor for a rise in graduation rates. A.S.U. uses the program to flag students (and their advisers) so they stay on track toward their degrees. The graduation rate for low-income students at A.S.U. still lags behind that of the student population over all, as it does nationally. But over the past three years, A.S.U. says its four-year graduation rate for lower-income students increased to 41 percent from 26 percent. The eAdvisor system also ties in with the registrar's office, so the university can make sure it's offering the courses that students need when they need them.

Georgia State University, meanwhile, uses predictive analytics to advise students on which majors they're most likely to succeed in based on their grades in prior courses. Its "major matcher" guides them using a database containing 2.5 million grades of Georgia State students over the past 10 years.

Colleges don't have to go hunting for a lot of this data. They already have mounds of it, but it's often stored in different electronic silos — the bursar's office, student affairs, the registrar — that don't connect with one another. With the new tools emerging from companies and in-house efforts, that's changing.

Still, there's a big difference between having the data and having the experience to use it effectively. The University of Maryland University College, an adult-focused institution that is part of the University of Maryland system, has learned that lesson. In early 2013, it put "attendance triggers" into its academic monitoring system, but disabled them for the many military students it enrolls after realizing that missed classes were inevitable for active-duty personnel but not necessarily predictive of academic trouble. The alerts were just annoying.

Big data has a lot of influential and moneyed advocates behind it, and I've asked some of them whether their enthusiasm might also be tinged with a little paternalism. After all, you don't see elite institutions regularly tracking their students' comings and goings this way. Big data advocates don't dispute that, but they also note that elite institutions can ensure that their students succeed simply by being very selective in the first place.

The rest "get the students they get," said William F. L. Moses, the managing director of education programs at the Kresge Foundation, which has given grants to the innovation alliance and to bolster data-analytics efforts at other colleges. "They have a moral obligation to help them succeed." Besides, Mr. Moses notes, colleges show little reticence now about using data analytics to figure out how big a scholarship it will take to entice a prospective student to enroll or to "find out how much money alumni have."

No doubt some of the interest colleges are showing in big data comes from the pressures of a national accountability movement that is demanding better graduation rates and more financial efficiency, a development reflected in the White House "summit on college opportunity" that is set to take place on Thursday. But Timothy M. Renick, vice provost at Georgia State, says efforts like its investment in the major matcher system are not just a nod to accountability. They stem from a growing realization that students, especially low-income ones, don't have the luxury of making mistakes in the name of exploration. If they run out of financial aid, "they're dropping out and they're dropping out with debt and no college degree," Mr. Renick points out. "We're giving them at least a fighting chance."

An ed-tech investor I know argues that colleges should be collecting even more data by mining Facebook and education-focused commercial sites like Chegg, where students go for online tutoring. "With real big data, you can serve up what they need before they even need it," said Michael Staton, a partner at the venture capital firm Learn Capital.

For reasons of privacy, practicality and data-reliability, that vision may be a longer way off than he would prefer. Yet some of these anticipatory approaches are already making their way into college classrooms in the form of "adaptive" textbooks and courseware, which use data analysis to offer instruction tailored to students' learning styles.

Colleges face no shortage of challenges these days: a skeptical public, fragile business models, stratification of students by income, and uncertainty of government financial support, to name just a few. Data solutions can't and won't save higher education from all of that, but they could certainly put colleges on the right path.

Goldie Blumenstyk, a senior writer at [The Chronicle of Higher Education](#), is the author of “American Higher Education in Crisis? What Everyone Needs to Know.”

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## South Carolina Commission on Higher Education

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### Overview of for Licensing of Postsecondary Institutions South Carolina Commission on Higher Education

Pursuant to the authority granted to the Commission on Higher Education (CHE) by Chapter 58, Title 59 of the SC Code of Laws, as amended, regulations for the issuance of licenses to postsecondary educational institutions and the issuance of permits to agents representing such institutions have been established and are covered by regulations in Article 1 of Chapter 62 of the State Regulations. The regulations are posted on the Commission's web site

[http://www.che.sc.gov/CHE\\_Docs/AcademicAffairs/License/Regulations2012.pdf](http://www.che.sc.gov/CHE_Docs/AcademicAffairs/License/Regulations2012.pdf)

In an effort to assist institutions and others in understanding and interpreting those regulations, CHE has prepared the following summary that organizes many of the stated criteria into a more accessible, user-friendly format. This summary is intended as a guide to the enacted regulations and does not in any way replace, supplant, or pre-empt the regulations as stated in SC Regulations 62-1 through 62-100.

The Commission may license an institution after due investigation has revealed that the institution and its programs have met stated criteria. The licensing function is primarily consumer protection and requires compliance with significant academic-oriented standards modeled after Southern Association of Colleges and Schools, Commission on Colleges, standards. The Commission licenses non-degree, occupational training programs and degree programs.

### Parameters for Licensing

Nondegree-granting (occupation)	Degree-granting
License period typically twelve months	License period not to exceed five years
Renewable annually	Annual reporting requires payment of fees, enrollment reports, financial statements, confirmation that bonds in the required amounts and liability insurance remain in place; updated publications
Reviewed and approved by licensing staff	Initial applications and license amendments for new in-state sites and programs reviewed and approved through staff with a team (as appropriate), CAAL, and CHE

**Criterion One: Academics and Curriculum**

*The course, program, curriculum, and instruction are of quality, content, and length as may reasonably and adequately achieve the stated objective for which the course, program, curriculum or instruction is offered and in response to documented need. **SC Reg. 62-6(A)** [Note: For specific program and instructor requirements by credential level, please see **SC Regs. 62-10 through 62-13.**]*

- A) An accrediting body recognized by the U.S. Department of Education or the Council for Higher Education Accreditation must accredit out-of-state degree-granting institutions. **SC Reg. 62-6(A)(i)**
- B) The institution publishes and enforces admission requirements consistent with the purposes of the institution. **SC Reg. 62-6(N)**
- C) The institution has developed satisfactory course and program outline(s) including syllabi for each course specifying goals and requirements, course content, methods of evaluation, and bibliography; attendance policy; grading policy including a policy for incomplete grades, rules of operation and conduct; and a policy for handling student complaints in compliance with Regulation 62-27. **SC Reg. 62-6(E)**
- D) Chief Academic Officers (those who choose faculty) must be credentialed at the same level as required for faculty. Site directors are credentialed at the same level as the highest degree conferred at the site. **SC Reg. 62-6(J)**
- E) Each full-time and part-time faculty member must present documentation of academic preparation, such as official transcripts and, if appropriate for demonstrating competency, official documentation of professional and work experience, technical and performance competency, records of publications, certifications, and other qualifications. The institution must keep on file, for each full-time and part-time faculty member, documentation of academic preparation. **SC Reg. 62-6(B); see entire citation.**
- F) Institutions must ensure that each faculty member employed is proficient in oral and written communication in the language in which assigned courses will be taught. **SC Reg. 62-6(B)**
- G) The institution must award the student an appropriate certificate, diploma or degree showing satisfactory completion of the course, program, or degree. **SC Regs. 62-6(F) and 62-6(D)**
- H) Adequate records as prescribed by the Commission are kept to show attendance and progress or grades, and satisfactory standards relating to attendance, progress, and conduct are enforced. **SC Reg. 62-6(G)**
- I) The institution must have a clearly defined process by which the curriculum is established, reviewed, and evaluated. The institution must provide for appropriate and regular evaluation of the institution and its program and course effectiveness including assessment of student learning, retention, graduation rates, and student, graduate, faculty, and employer satisfaction. The results must be used to ensure and improve quality of instruction. **SC Reg. 62-6.2**

**Criterion Two: Facilities**

*There is in the institution adequate space, equipment, instructional material, and appropriately qualified instructional personnel to provide training and education of good quality. **SC Reg. 62-6(B)***

- A) The institution complies with all local, county, and state regulations, such as fire, building, and sanitation codes. **SC Reg. 62-6(H)**
- B) The institution must have adequate security measures to protect and back up [its] data. **SC Reg. 62-20**
- C) The institution must have policies concerning retention and disposal of records and information-release policies which respect the rights of individual privacy, the confidentiality of records, and the best interests of the student and institution. **SC Reg. 62-20(A-D) for a listing of components.**
- D) Programs offered by distance education must meet the licensing requirements of the Nonpublic Postsecondary Institution License Act. **SC Reg. 62-6.1**
- E) The institution owns or makes available sufficient learning resources or, through formal agreements with institutional or other (where adequate) libraries to which students have access, ensures the provision of and access to adequate learning resources and services required to support the courses, programs and degrees offered. **SC Reg.62-6(C); see complete citation for stipulations regarding formal agreement and SC Reg. 62-14 for library requirements.**
- F) Any student living quarters owned, maintained, or approved by the institution are appropriate, safe and adequate. **SC Reg 62-6(Q)**

**Criterion Three: Finances**

*The institution is financially sound and can fulfill its commitments for education or training. SC Reg. 62-6(I)*

- A) The institution does not owe a penalty under Chapter 58 of Title 59, South Carolina Code of Laws, 1976. **SC Reg. 62-6(O)**
- B) Before an institution is licensed, a surety bond – or other acceptable means of collateral - must be provided by the institution, the obligation of which will be that the institution, its officers, agents, and employees will faithfully perform the terms and condition of contracts for tuition and other instructional fees entered into between the institution and persons enrolling as students. **SC Reg. 62-7; see complete citation for terms governing bond requirement, including SC Reg. 62-7(F), which outlines alternative to surety bond.**
- C) The institution shall maintain adequate financial records and exercise proper management, financial controls, and business practices. **SC Reg. 62-8(A)**
- D) Adequate insurance shall be carried to protect the institution's financial interests. The amount of insurance shall be sufficient to maintain the solvency of the institution in case of loss by fire or other causes, to protect the institution in instances of personal and public liability, and to assure continuity of the operation of the institution. **SC Reg. 62-8(D)**
- E) Degree-granting institutions shall maintain a sound plan for long-range financial development. **SC Reg. 62-8(E)**
- F) Degree-granting institution's business and financial management shall be centralized under a qualified and bonded business offer responsible to the chief executive officer and charged with the supervision of the budget. **SC Reg. 62-8(F)**
- G) The institution must have a schedule of tuition, fees, other charges and refund policy. (**SC Reg. 62-8(E); see also SC Reg. 62-17 for a complete description of tuition policy requirements and SC Reg. 62-18 for cancellation and refund policy guidelines.**)

**Criterion Four: Reputation and Character**

*The institution's owners and directors are appropriately experienced and educated and are of good reputation and character. SC Reg. 62-6(J); see SC Reg. 62-6(J)(1-6) for specific definition of "good reputation."*

- A) Site directors should be credentialed at the same level as the highest degree conferred at the site. **SC Reg. 62-6(J)**
- B) All administrative officers must possess credentials, experience and/or demonstrated competence appropriate to their areas of responsibility. **SC Reg. 62-6(J)**
- C) The effectiveness of all administrators must be evaluated periodically. **SC Reg. 62-6(J)**
- D) The institution has, maintains, and publishes in its catalog, bulletin, or brochure and in its enrollment contract the proper refund policy that complies with Regulation 62-18. **SC Reg. 62-6(K); SC Reg. 62-18; and SC Reg. 62-16 for requirements relating to information at a minimum that must be included the institution's catalog, bulletin or brochure.**
- E) The institution does not use erroneous or misleading advertising by actual statement, omission, or intimation; it provides students, prospective students and other interested persons a catalog, bulletin or brochure containing the minimum items as identified in CHE Regulation 62-16. **SC Reg. 62-6(L) and SC Reg. 62-6(P)**
- F) The institution does not use a name that is misleading, the same as or similar to that of an existing institution. **SC Reg. 62-6(M)**

<b>List of Required Exhibits for Initial Degree-Granting Licensure</b>
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**DOCUMENTS**

- Initial license fee with documentation to substantiate the amount of the fee (Regulation 62-23)
- Prepayment of estimated review team expenses may be required
- Original surety bond submitted on the form provided by the Commission in an amount equal to 10% of the Gross Tuition Income (Regulation 62-7)
- A brief description of any pending litigation in which the institution is named as a defendant, or in which an owner or director of the institution is a plaintiff or defendant, the results of which may negatively impact the institution
- A description of the institution (name, type, ownership (public/private/for- or non-profit); number of branches, locations)
- Catalog, Bulletin, or Brochure (whichever is appropriate)
- "Catalog Checklist" (completed form) (Regulation 62-16)
- Program Proposal for each academic program
- Information/certification form(s) for all persons in positions of institution, including the following:
  - chief executive officer(s)
  - chief administrative and fiscal officer(s), including owner(s)
  - partner(s)
  - director(s), with a résumé (including three references) for each
- Sample advertising materials. (Regulation 62-25&26)
- Course syllabi. (Regulation 62-6.E)

**COPIES**

- Articles of Incorporation
- Partnership Agreement (if applicable)
- Corporate By-Laws
- Purchase Agreement if applicable.
- A signed copy of ownership, lease, rental agreement, or memorandum of understanding for use of the facilities.

**EVIDENCE OF...**

- Financial resources sufficient to show that the institution possesses adequate liquid assets to make potential refunds to students, to pay expenses in a timely fashion, and to maintain continuity for an extended period (Regulation 62-8)
- Insurance adequate enough to protect the institution's financial interests (Regulation 62-8.D)
- Professional liability insurance for the institution, instructors, and students if a proposed program is health-care related and/or includes clinical activities (Regulation 62-8.D)
- Authority in the home state to offer the program(s) for which application is sought, if applicable, and a list of other states where the institution operates and is exempt or is licensed, whether the approval is in good standing (not in warning, probation, or other status), and an explanation of any pending complaints
- Compliance with all local, county, and state regulations, such as fire inspection (indicating no deficiencies or exceptions), building, business, and sanitation codes
- Attendance records, progress records, and transcripts the institution will maintain on each student and a plan for maintenance of student records. (Regulations 62-6.D., Student Records)
- Clinical agreements for programs, where applicable
- Diplomas the institution will award

**SUGGESTED AREAS FOR REVIEW – LICENSING STATUTE AND REGULATIONS**  
**CAAL January 2015**

Statute/Regulation Section	Issue	Purpose
ENFORCEMENT 59-58-100, 120, 130; Regulations 62-22 and 28	Request assistance from AG to investigate and craft proposed changes to licensing statute and regulations	Specify parameters under which CHE could seek criminal penalties (now civil only) and other ways to enforce compliance. Some states use consent orders, public notices of violations, or other provision for making information available to the public.
62-5 Effect of Licensing – Access and Equity	Remove this section	Unenforceable, invalidated by courts, the provision was carried over from prior licensing authority intended to prohibit licensure of programs that competed a program at SC State University
62-15 On-site examination	Costs of on-site evaluations	Clarify that CHE may require the institution to advance funds for site review expenses for in-state proposals including honoraria for team members
62-16 Catalog/bulletin requirements	Information should be consistent among all venues of advertising	Make specific that information posted on the institution's web site must also comply with print publication parameters.
62-16 Catalog/bulletin requirements	Revise to make clear that institutions must provide a total cost similar to “truth-in-lending”	Current is a statement of tuition and other charges, but does not specifically list total costs to include estimated interest on student loans.
62-16 Catalog/bulletin requirements	Add requirement about job market, income expectations, and school placement rates.	New requirement that institutions provide the information or links to resources for students such as NCES and BLS.
62-18 Cancellation and refund policy	Consider changes for flexibility to accommodate up-front costs of institutions	Current policy does not allow non-refundable application fees and requires pro-rated refund for first 60% of the first term of enrollment.