

BOARD OF HIGHER EDUCATION

REQUEST FOR BOARD ACTION

NO.: BHE 26-67

BOARD DATE: June 26, 2026

APPLICATION OF MERRIMACK COLLEGE SUBMITTED PURSUANT TO 610 CMR 16.00 TO AWARD THE FOLLOWING FOUR 96-CREDIT APPLIED BACCALAUREATE DEGREE PILOT PROGRAMS: APPLIED BACHELOR OF ARTS IN PSYCHOLOGY, APPLIED BACHELOR OF ARTS IN COMMUNICATION, APPLIED BACHELOR OF ARTS IN CRIMINAL JUSTICE, AND APPLIED BACHELOR OF SCIENCE IN BUSINESS ADMINISTRATION

MOVED: The Board of Higher Education [BHE] hereby approves conditionally, pursuant to the BHE's Degree Granting Regulations for Pilot Proposals on Innovation, 610 CMR 16.00, the pilot program application of **Merrimack College** to offer and award the following 96-Credit Applied Baccalaureate Degree programs:

- Applied Bachelor of Arts in Psychology
- Applied Bachelor of Arts in Communication
- Applied Bachelor of Arts in Criminal Justice
- Applied Bachelor of Science in Business Administration

Based on a review of all materials submitted by the institution, including the New England Commission of Higher Education's (NECHE) conditional approval of the proposal, and in consideration of public comment received, pursuant to 610 CMR 16.10(1) initial approval of the pilot programs is for five (5) years and is subject to the additional following conditions:

- 1) Pursuant to 610 CMR 16.08(3), the institution must undergo an external review organized and conducted by NECHE, which includes the participation of Department staff and is scheduled within two years of the start of the programs. The institution must comply with any requests from Department staff for additional information and shall participate in any periodic inspections necessary to determine whether the programs meet

the BHE's standards, see 610 CMR 16.08(3) and 610 CMR 2.05(5) and 2.09.

- 2) The institution shall prepare and submit annual status reports, as required pursuant to 610 CMR 16.09, and shall submit, upon request, any other information as may be requested by Department staff to help assess the institution's compliance with the BHE's regulatory requirements, the institution's progress in establishing the programs, and the Commissioner's development of the evaluation framework referenced below . See 610 CMR 16.09. The timing, format, and manner of said reports and information requests shall be prescribed by Commissioner.

Provided the BHE hereby charges the Commissioner to develop an evaluation framework, for BHE approval, over the next twelve months. The Commissioner shall work with the piloting institutions and stakeholders, including NECHE, the College-in-3 Exchange and others, to develop the evaluation framework. The institution, upon request, shall provide all necessary information to inform the Commissioner's development of the evaluation framework that will be used for the purpose of assessing overall and program-specific outcomes of applied baccalaureate degree pilot programs. The Commissioner shall submit the evaluation framework to the BHE for approval no later than June 2027. The evaluation framework shall, at a minimum:

- a. identify the appropriate measures and metrics to evaluate the progress and success of the pilot programs, provided that, at a minimum, success outcomes shall include "measures of persistence, graduation rates, total cost to students and subsequent employment and earnings outcomes" (610 CMR 16.07(12)), as well as an assessment of students' future eligibility for transfer opportunities and continued study 610 CMR 16.06(2)(g); and
- b. identify factors the BHE shall take into consideration in extending, concluding, or codifying the pilot pursuant to 610 CMR 16.11.

In accordance with 610 CMR 16.11, based on an evaluation of the authorized pilots and no later than June 2031, the Board will either: grant full approval to the programs by removing the pilot designation; extend conditional approval of the pilots for another period of time; consider future regulatory or policy changes to codify and scale the pilots; or otherwise work with the institution to phase out the pilots if unsuccessful.

VOTED: Motion adopted by the BHE on 6/26/2026.

Authority: M.G.L. c. 69, § 30 et seq., 610 CMR 16.00

Contact: Richard Riccardi, Sc.D., Deputy Commissioner for Academic Affairs and Student Success

**BOARD OF HIGHER EDUCATION
June 2026**

**Merrimack College
Pilot Proposal on Innovation
Applied Bachelor of Arts in Psychology
Applied Bachelor of Arts in Communication
Applied Bachelor of Arts in Criminal Justice
Applied Bachelor of Science in Business Administration**

BACKGROUND

Merrimack College (Merrimack or College) is requesting authorization to offer on a pilot basis four 96-credit applied baccalaureate degree programs: Applied Bachelor of Arts in Psychology, Applied Bachelor of Arts in Communication, Applied Bachelor of Arts in Criminal Justice, and Applied Bachelor of Science in Business Administration, pursuant to the Board of Higher Education's Degree Granting Regulations for Pilot Proposals on Innovation, 610 CMR 16.00.

Established in 1947, Merrimack is a private, nonprofit independent institution, located in North Andover, Massachusetts, with the authority to "grant and confer degrees such as are usually conferred by colleges in the Commonwealth of Massachusetts, except degrees in medicine and law other than honorary doctorates." Merrimack has been continuously accredited by the New England Commission of Higher Education (NECHE) since 1953.

PROPOSAL DEVELOPMENT AND EVALUATION

Merrimack's proposal to launch four 96-credit applied baccalaureate programs emanates from the College's membership in a national "College-in-3 Exchange," a consortium that originated in a convening held in 2020. This consortium, which as of 2025 had 68 participating institutions across the United States, has sought to rethink the standard baccalaureate degree, requiring 120 semester hours of study completed over four years of full-time enrollment, to provide options at 90 credits earned over three years of full-time study.

President Christopher Hohey of Merrimack College convened a working group in 2021 to consider how to reduce the number of credits required for a baccalaureate degree to aim for a program of study that could be completed in three years (six traditional semesters). The concepts of "affordability and access" as well as maintaining "Merrimack's meaningful, student-centered education" were elements of the design

process. The working group also considered how the proposed program design would fit with the goals of the college's strategic plan, Agenda for the Future (2021 – 2026).

The working group produced a framework for 96-credit baccalaureate degrees in Spring 2022, which was vetted and successfully passed through Merrimack's governance process, including approval by Merrimack's Board of Trustees in September 2022. Academic departments designed specific programs of study in the spring of 2023. While a total of eleven of the 96-credit programs of study have since been approved through Merrimack curricular processes, the college is seeking approval to offer four of these programs at this time:

- Applied Bachelor of Arts in Psychology
- Applied Bachelor of Arts in Communication
- Applied Bachelor of Arts in Criminal Justice
- Applied Bachelor of Science in Business Administration

Following the Massachusetts Board of Higher Education's approval of the Degree Granting Regulation for Pilot Proposals on Innovation (610 CMR 16.00) on February 10, 2026, Merrimack submitted an innovation pilot proposal to offer four 96-credit baccalaureate degree programs. After reviewing the minimum eligibility criteria in 610 CMR 16.04, DHE Staff determined that Merrimack College met the criteria and was therefore an eligible institution.

Merrimack had previously submitted its proposal to its accreditor, NECHE, which approved the proposal under its Policy on Innovation in April 2024 contingent on the College receiving approval from the Massachusetts Board of Higher Education. DHE Staff determined that an external review process conducted by NECHE would be accepted pursuant to 610 CMR 16.08(3) in lieu of requiring an external review organized and conducted under 610 CMR 16.08(2) as the accrediting agency's standards and processes are appropriately aligned to the Board's standards and processes related to degree-granting authority.

DHE Staff accepted and reviewed Merrimack's innovation pilot proposal consistent with the procedures and criteria set forth in 610 CMR 16.00. DHE staff reviewed the College's proposal under the two primary review criteria established in 610 CMR 16.06: Innovation (610 CMR 16.06(1)); and Quality and Consumer Protection (610 CMR 16.06(2)).

First, under the Innovation standard, staff evaluated whether the proposal represents an innovative approach designed to increase the effectiveness of higher education and the risks of temporarily waiving or modifying the Board's standards or regulations to advance the pilot program are outweighed by the proposed benefits. 610 CMR 16.06(1)(a)-(d). Second, under the Quality and Consumer Protection standard (610 CMR 16.06(2)), staff assessed whether the institution's proposal demonstrates the institution's

“overall ability to sustain an appropriate learning environment for students” and otherwise satisfies the Board’s standards or regulations for degree-granting institutions. 610 CMR 16.06(2)(a)-(g). As required under the regulations, this review included an assessment of whether Merrimack demonstrated the academic, financial, human, physical, and technological capacity to implement and sustain the proposed initiative; whether the initiative is consistent with the institution’s mission and degree-granting authority; whether the proposed academic program demonstrates integrity in its design and student outcomes; and whether students will be adequately informed and protected through clear, transparent disclosures of the pilot’s nature and any potential implications for transfer, graduate study, or employment. See 610 CMR 16.06(2)(a)-(g) and 610 CMR 16.07(1)-(14).

To conduct this review, DHE staff performed a detailed examination of the application materials and supporting documentation consistent with the requirements in 610 CMR 16.06, 610 CMR 16.07, and 610 CMR 2.00. Because the initial submission did not provide sufficient information to evaluate compliance with specific regulatory requirements, DHE staff requested supplemental materials and clarifications from Merrimack College on March 31, 2026.

In particular, DHE staff noted concerns on potential risks to students, including transferability, graduate school eligibility, residency requirements, and the need for clear disclosures regarding program limitations and informed consent. DHE staff requested evidence of the proposal's efficacy and workforce alignment, including Massachusetts-specific labor market data, employer acceptance of reduced-credit bachelor's degrees, as well as updated curriculum maps, assessment and evaluation plans, revised marketing materials, and additional information regarding internship requirements, including their administration and assessment. Finally, staff requested documentation demonstrating how student outcomes, program quality, and learning outcomes would be measured and evaluated throughout the pilot.

On May 11, 2026, Merrimack College submitted a revised innovation pilot proposal, addressing the DHE’s requests for additional information and clarification. Staff reviewed the revised submission, confirmed that the outstanding issues had been satisfactorily addressed, and determined that the proposal satisfied the application requirements set forth in 610 CMR 16.07. The institution’s revised innovation pilot proposal is attached **(Attachment A)**. During this iterative review process, staff developed a comprehensive regulatory crosswalk, provided in **Attachment B**, and verified that the institution had adequately addressed all identified questions and concerns, and met the standards set forth in 610 CMR 16.00 prior to advancing the proposal for Board consideration.

OVERVIEW AND PURPOSE

Merrimack states that its primary objective of reducing the credit requirements of these proposed degree programs is to address critical challenges facing modern higher education, including rising tuition costs, mounting student debt, declining enrollment, and workforce shortages while also delivering a degree of similar value to a traditional bachelor's degree. By significantly reducing the time and cost to complete a bachelor's degree, the College aims to expand educational access and improve the return on investment for students, which is central to the College's mission. Merrimack identified that reduced-credit applied bachelor's degrees have gained acceptance from multiple accreditors nationally and are now being offered in neighboring New England states.

Key Structural Features of the Initiative

- **Curricular Integrity:** Merrimack asserts that the 96-credit applied bachelor's degrees meet the exact same 40-credit general education requirements ("core") as Merrimack's traditional 124-credit programs, and learning outcomes for the majors overlap significantly.
- **Streamlined Electives:** Merrimack indicates that the main structural difference is that students in the 96-credit applied bachelor's degree programs will take fewer open electives rather than seeing a reduction in core academic content.
- **Typical Course Load:** Students will take a standard full-time course load (16 credits per semester) and can graduate in three (3) years without the need to take mandatory summer or winter courses. Merrimack asserts that this preserves their ability to participate in internships, employment, and co-curricular activities outside of the academic year.
- **Cost Savings:** Merrimack estimates that the total cost at graduation for these applied bachelor's degrees will be approximately 75% (70 to 80%) of the cost of the comparable 124-credit degrees.
- **Workforce and Employer Alignment:** Merrimack suggests that the curriculum moves away from a focus on defining a bachelor's degree as total "time spent in a seat" in favor of a model that emphasizes program and core learning outcomes. The College asserts that its recent outreach indicates that employers are highly receptive to three-year degrees, prioritizing demonstrated skills, leadership, and practical experience over the total number of credits when it comes to the majors selected for this pilot.

Description of the Proposed Degrees

Merrimack proposes to launch this pilot with four specifically chosen degrees that align with regional workforce needs and are structurally well-suited for an applied format.

Applied Bachelor of Arts in Psychology

- **Focus:** Merrimack states that this degree will prepare students for careers in areas such as mental health support, human services, behavioral health, and human resources, while also acting as a competitive pathway into Merrimack's master's programs in clinical and mental health counseling or social work. The College states that students will be well prepared for its Master of Science in Clinical and Mental Health Counseling, the Master of Education in School Counseling, Master of Social Work, and Master of Industrial/Organizational (I/O) Psychology programs.
- **Distinguishing Features:** Relative to the 124-credit degree, Merrimack asserts that the applied bachelor's degree places greater emphasis on experiential learning by requiring multiple internships.
- **Summary of Major Program Learning Outcomes:** The College indicates that students will be able to apply analytic reading and critical thinking skills to interpret scholarly literature, evaluate evidence, and construct well-supported arguments. The program requires proficiency in statistical and research methodologies, enabling students to design and analyze psychological studies. Additionally, students will learn to communicate effectively to diverse audiences, collaborate in group settings, utilize information literacy tools, apply ethical standards to professional practice, and demonstrate a deep appreciation for human diversity and its impact on behavior.
- **Credits:** Because of the expanded emphasis on experiential learning, the major is sixty (60) credits, with twelve (12) of the major credits also counting towards the core. As a result, twenty-eight (28) additional core credits are required, which brings the total credits that count towards the major and the core to eighty-eight (88). This allows for eight (8) credits of open electives, or additional electives within the major.

Applied Bachelor of Arts in Communication

- **Focus:** Merrimack considers this to be a versatile degree leading to careers, including those in public relations, advertising, social media marketing, and event management.

- **Distinguishing Features:** The College states that the 40-credit major maximizes curricular flexibility by prioritizing praxis-oriented courses. Students engage in hands-on projects, live media production, and strategic communication writing.
- **Summary of Major Program Learning Outcomes:** Merrimack indicates that students will be able to demonstrate an understanding of ethical practices for responsible communication and recognize the discipline's societal and professional implications. Students will be trained to prepare and present effective messages across various contexts, construct well-reasoned arguments and appropriately use media technologies to create and share information.
- **Credits:** The major is forty (40) credits, and the core is forty (40 credits), which allows up to sixteen (16) credits for electives.

Applied Bachelor of Arts in Criminal Justice

- **Focus:** Merrimack states that this degree was designed to prepare students for the practical workings of the criminal justice and juvenile justice systems, targeting careers in law enforcement, courts, corrections, victim advocacy, and related public safety agencies.
- **Distinguishing Features:** The College indicates that the curriculum is highly career-focused and less theoretical than its 124-credit counterpart. It heavily concentrates on applied skills, ethical principles, and career-readiness.
- **Summary of Major Program Learning Outcomes:** Merrimack asserts that students will be able to: analyze the causes of crime through sociological, psychological, and biological frameworks, understand the comprehensive structure of the criminal and juvenile justice systems, apply critical thinking and research methods to evaluate justice policies, interpret crime data, communicate analyses effectively, and apply ethical principles to professional decision-making.
- **Credits:** The major is forty-eight (48) credits, and the core is forty (40 credits), which allows up to eight (8) credits for electives.

Applied Bachelor of Science in Business Administration

- **Focus:** Merrimack states that this is a streamlined, general business degree focused on core business competencies. It prepares students for diverse fields like sales, project management, general administration, and entrepreneurship.
- **Distinguishing Features:** The College indicates that this program provides a broad foundation and requires an active experiential business component. It

places a heavy emphasis on interpersonal skills, collaboration, data analysis, and professional communication.

- **Summary of Major Program Learning Outcomes:** Merrimack attests that students will be able to produce professional written documents and effectively communicate complex business concepts using appropriate strategies. The program places a strong focus on teamwork, requiring students to apply collaboration processes and function as both contributing members and leaders. Finally, graduates will be trained to analyze data to generate actionable insights, clearly define complex business constraints, and develop creative, feasible solutions to organizational problems.
- **Credits:** The major is fifty-six (56) credits, and the core is forty (40 credits). There are two (2) major courses that can also count towards the core, which then allows for eight (8) credits of open electives, or additional electives within the major.

Assessment Plan

Merrimack College asserts that it is committed to a rigorous, transparent assessment plan to ensure these pilot degrees maintain high academic standards and student success outcomes. The College will partner with the national College-in-3 Exchange to share data, benchmark against peer institutions, and contribute to the broader body of higher education research on reduced-credit models.

Key Assessment Strategies

- **Direct Assessment of Student Learning**
- **Student Experience and Post-Graduation Success:** Student satisfaction will be captured on a regular basis, and the College will measure employment rates, job placement, early career earnings, and graduate school enrollment, expecting these metrics to mirror the performance of graduates from 124-credit programs.
- **Program Effectiveness and Efficiency:** The College will formally track the cost-efficiency of the degree. Institutional outcomes such as completion rates, time to degree, year-to-year retention rates, and internal transfer patterns (between 96-credit and 124-credit degrees) will be strictly monitored at 3- and 5-year benchmarks.
- **Continuous Improvement:** The College will incorporate a mix of formative (ongoing course-level feedback) and summative (milestone reviews) assessments into annual reports and program reviews, allowing faculty and administrators to make evidence-based curriculum adjustments.

Transparency and Consumer Protections

Merrimack will adopt the "Applied Bachelor's" degree title to clearly distinguish this credential from traditional 120-credit baccalaureate degrees, consistent with NECHE guidance. NECHE recently updated their guidance to institutions proposing reduced-credit baccalaureate, requiring the following disclosure text:

Reduced-Credit baccalaureate degrees are eligible for Title IV federal financial aid. However, students who complete a reduced-credit baccalaureate degree and choose to then complete either a traditional baccalaureate or other undergraduate certificates or programs may not be eligible for federal financial aid.

Reduced-credit baccalaureate degrees may not be sufficient for admission into graduate level programs and may not be considered equivalent to a traditional 120-credit bachelor's degree by some employers.

The norm for a baccalaureate degree remains 120 credits. Reduced-credit baccalaureate degrees will be highly structured with limited elective credits.

Informed Consent

As part of the admissions process, students will be required to acknowledge that they are participating in a pilot program offered under Massachusetts Board of Higher Education's Degree Regulations for Pilot Proposals on Innovation. This disclosure helps ensure that students understand the pilot nature of the program and supports the informed consent requirements in 610 CMR 16.06(1)(d), 16.06(2)(g), and 16.07(11).

Students will be made aware that these programs are best suited to students committed to a particular field or discipline, students who have a clear career objective, and/or students who are focused on pursuing near-term employment in their chosen industry as practitioners. Students will also be made aware that for them to complete the applied programs in less time and with fewer credits, these programs will be highly structured with limited opportunity for elective credits. Providing this information helps prospective students identify potential limitations and support informed-decision making, consistent with the student-risk and informed consent requirements in 610 CMR 16.06(1)(d), 16.07(8), and 16.07(11).

Merrimack's applied bachelor's programs will be sufficient to meet admission requirements for Merrimack's master's degree programs. However, other institutions may have different admission requirements, and students will be made aware that such institutions may not accept Merrimack's applied bachelor's program as sufficient for admission. This information is provided to ensure clear and transparent communication regarding potential limitations on continued study opportunities, in furtherance of the

consumer protection requirements contained in 610 CMR 16.06(2)(g), 16.07(8), 16.07(10), and 16.07(11).

Merrimack's applied bachelor's programs are eligible for Title IV federal financial aid. However, students will be made aware that if they leave Merrimack having completed an applied bachelor's degree (or any bachelor's degree for that matter) but later choose to return to Merrimack or attend another institution to complete additional undergraduate credits, either to earn a Certificate of Post-baccalaureate Studies or to earn a second baccalaureate degree, they will not be eligible for federal grant aid and may have limited eligibility for other federal aid programs. Informing students of these potential financial implications supports the transparency and informed consent provisions of 610 CMR 16.06(2)(g), 16.07(8), 16.07(10), and 16.07(11).

Student progress will be closely monitored through retention and completion data, and advising structures will be designed to support informed decision-making and timely intervention where needed. For students who determine that a traditional 124-credit pathway better meets their academic or career goals, Merrimack will maintain flexibility for internal transfer between reduced-credit and traditional degree programs. These measures are designed to mitigate potential risks and ensure students are appropriately supported throughout the pilot, reflecting the expectations set forth in 610 CMR 16.06(1)(d), 16.07(8), and 16.07(12).

Institutional Resources and Cost

Merrimack asserts that it has sufficient administrative, financial, human, physical and technological resources to implement and sustain the four proposed applied baccalaureate degree programs. The College will administer the proposed programs through its existing academic governance, budgeting, and student support structures, and states that the programs can be delivered primarily through existing major and general education courses staffed by current faculty. As of Fall 2025, Merrimack reports that it employed 197 full-time faculty, 14 faculty serving in administrative roles, 433 full-time staff, and 46 part-time staff. The College affirms that students enrolled in the applied baccalaureate degree programs will have access to the same faculty, academic support and career development services, student employment opportunities, health and wellness services, residential options, and co-curricular opportunities available to students enrolled in traditional degree programs. In addition, Merrimack indicates that its existing facilities and technological resources are sufficient to support the proposed programs.

Merrimack projects that students completing the 96-credit programs will incur approximately 75 percent of the tuition and fee costs associated with its comparable 124-credit bachelor's degree programs and will save approximately one year of tuition, fees, room and board, and related educational expenses by completing the degree in

three years rather than four. Students enrolled in the applied baccalaureate degree programs will remain eligible for Title IV financial aid.

PUBLIC COMMENT

Notice for public comment, along with an executive summary of the proposal, prepared by the institution, and a copy of the institution's proposal, was posted on the Department's website on May 29, 2026. The public comment period ended on June 19, 2026. Overall, 207 unique comments were received, with the majority of the comments against the concept of reduced credit baccalaureate degrees and not addressing the particular attributes of the Merrimack proposal. In total, 200 comments were against, three were for, and four suggested delaying a decision. The most common concerns expressed were the creation of a two-tier higher education system, academic quality and rigor, graduate school preparation, workforce competitiveness, transferability and credential recognition. Supporters primarily focused on improving affordability and access, while opponents argued that those same goals should be achieved through increased public investment rather than by reducing degree requirements. A document with identifies and summarizes all public comments received before the public comment period closed on June 19, 2026 is attached as **Attachment C**.

Based on a review of all materials submitted by the institutions and in consideration of public comments received, Department staff recommend conditional approval of the programs. In addition to affirming the institution's regulatory requirements to comply with Department requests for information and to submit to any necessary periodic inspections, the conditions require the institution to undergo an external review organized and conducted by NECHE, with Department participation, and to submit annual status reports.

Further, BHE charges the Commissioner to develop an evaluation framework to identify appropriate measures and metrics to evaluate the progress and success of the pilot programs. At a minimum, success outcomes shall include "measures of persistence, graduation rates, total cost to students and subsequent employment and earnings outcomes" (610 CMR 16.07(12)), as well as an assessment of students' future eligibility for transfer opportunities and continued study 610 CMR 16.06(2)(g).

STAFF ANALYSIS AND RECOMMENDATION

After a thorough evaluation of all documentation submitted, staff is satisfied that the proposal of Merrimack College to award the proposed degree programs meets the Board of Higher Education's requirements set forth in 610 CMR 16.00: Degree Granting Regulations for Pilot Proposals on Innovation. Staff recommends that the Board conditionally approve this application by Merrimack College to award these degrees, consistent with the conditions set forth in the motion language.

May 11, 2026

VIA EMAIL

Noe Ortega, Ph.D.
Commissioner, Massachusetts Department of Higher Education
Nortega@dhe.mass.edu

Dear Commissioner Ortega:

Pursuant to 610 CMR 16.00: Degree Granting Regulations for Pilot Proposals on Innovation, Merrimack College (“Merrimack” or “College”) hereby submits this Letter of Intent to the Massachusetts Board of Higher Education (“BHE” or the “Board”) seeking authorization to offer four 96-credit applied bachelor’s degree programs in business, criminal justice, psychology, and communication. The College received approval in April 2024 from the New England Commission of Higher Education (NECHE) to offer these programs pending state approval. This submission is intended to provide the information required by the Board to evaluate the proposed programs within the framework of 610 CMR 16.00 and to support a determination regarding their implementation in the Commonwealth.

This Letter of Intent is organized as follows:

- I. Demonstration of institutional eligibility [610 CMR 16.07(1)]
- II. Identification of program elements that are inconsistent with Board regulations or policies [610 CMR 16.07(2)]
- III. Proposal Purpose and Intent [610 CMR 16.07(1)]¹
- IV. Review criteria related to Innovation [610 CMR 16.06(1)]
- V. Review criteria related to Quality and Consumer Protection [610 CMR 16.06(2)]
- VI. Appendix A: Program Overviews and Description, Program Learning Outcomes and Curriculum Map
 - A. Applied Bachelor of Arts in Psychology
 - B. Applied Bachelor of Arts in Communication
 - C. Applied Bachelor of Arts in Criminal Justice
 - D. Applied Bachelor of Science in Business Administration
- VII. Appendix B: Assessment Plan

¹ In 610 CMR 16.00 there are two sections numbered “610 CMR 16.07(1);” the first refers to eligibility (which is covered here in section I), the second refers to the purpose and intent of the initiative (which is covered here in section III).

Note: In order to limit repetition, the required elements of 610 CMR 16.07 not covered in Sections I, II and III have been included within the relevant sections IV and V as follows:

Specific Section of 610 CMR 16.07	Specific Section of 610 CMR 16.06	Section
610 CMR 16.07(2): Problem to be solved	610 CMR 16.06 (1)(b)	IV.
610 CMR 16.07(3): Program Efficacy	610 CMR 16.06 (1)(a)	IV.
610 CMR 16.07(4): Consistency with Mission	610 CMR 16.06 (2)(a)	V.
610 CMR 16.07(5): Demonstrated Need	610 CMR 16.06 (1)(b)	IV.
610 CMR 16.07(6): Alignment with Academic/Workforce Needs	610 CMR 16.06 (1)(b)	IV.
610 CMR 16.07(7): Resources required	610 CMR 16.06 (2)(d)	V.
610 CMR 16.07(8): Risk/Risk Mitigation	610 CMR 16.06 (1)(d)	IV.
610 CMR 16.07(9): Degree Nomenclature	610 CMR 16.06 (2)(e)	V.
610 CMR 16.07(10): Marketing Material Disclosure	610 CMR 16.06 (2)(g)	V.
610 CMR 16.07(11): Informed Consent	610 CMR 16.06 (2)(g)	V.
610 CMR 16.07(12): Outcomes	610 CMR 16.06 (1)(c)	IV.
610 CMR 16.07(13): Assessment	610 CMR 16.06 (1)(c)	IV.
610 CMR 16.07(14): Other relevant information	N/A	

I. Demonstration of institutional eligibility [610 CMR 16.07(1)]

Merrimack is eligible for consideration for approval of a pilot proposal under 610 CMR 16.04 based on the following: (1) the College has been accredited by NECHE continuously since 1953, and has been accredited without sanction or public notation for more than six years preceding the date of this proposal; (2) the College has operated in Massachusetts since receiving its charter from the Commonwealth in 1947; (3) the College has operated continuously by the same governing entity for a minimum of six years; and (4) the College is not under any investigation or corrective action reasonably related to an academic program, academic quality and/or the sufficiency of financial resources by the Commonwealth, including the Massachusetts Attorney General and the Department, or the federal government. Accordingly, Merrimack meets the institutional eligibility requirements of 610 CMR 16.07(1).

II. Identification of program elements that are inconsistent with Board regulations or policies [610 CMR 16.07(2)]

The sole regulatory inconsistency identified is the 120-credit minimum for bachelor's degrees set forth in 610 CMR 2.07. The College submits that, consistent with the purpose of 610 CMR 16.00, the benefits of this innovation, measured in student access, cost reduction, workforce alignment, and improved educational effectiveness, outweigh the risks associated with temporary modification of that standard.

III. Purpose and Intent [610 CMR 16.07(1)]

Merrimack College is seeking approval to offer the following 96-credit applied bachelor's degrees:

- Applied Bachelor of Arts in Psychology
- Applied Bachelor of Arts in Communication
- Applied Bachelor of Arts in Criminal Justice
- Applied Bachelor of Science in Business Administration

The Applied B.A. and B.S. degrees offered as part of this 96-credit initiative meet the same general education requirements as every other 124-credit degree program at Merrimack, and learning outcomes for each of the majors overlap significantly with the similar companion 124-credit programs (see **Section VI: Appendix A** below). The primary difference for students in the 96-credit programs is that they will take fewer electives, and are constrained in pursuing double majors, minors, and study abroad opportunities. At the same time, students will have flexibility in choosing specific clusters of related courses within the existing suite of general education courses. Students in these programs will typically take the same full semester course load as other Merrimack students (16 credits per semester) and thus will not need to take

summer or winter term courses, allowing them greater accessibility to co-curriculars, internships, and employment opportunities as compared to accelerated 3-year pathways (120-credits in three years). They may take courses in summer and winter terms if they choose, but they do not need to utilize those terms in order to graduate in three years.

The 96-credit degree framework was designed to address many of the challenges currently facing higher education. By significantly reducing the cost and time to complete a bachelor's degree, it has the potential to expand educational access, reduce time to completion, improve retention rates and enhance return on investment.

A 96-credit bachelor's degree model that emphasizes clearly defined learning outcomes represents a meaningful shift in how undergraduate education is conceptualized and assessed. Rather than defining a degree primarily by inputs, such as the number of credits completed or time spent in class, this approach centers on demonstrable student learning and competency acquisition.

IV. Review criteria related to **Innovation** [610 CMR 16.06(1)]

The institution is proposing an innovative pilot program that seeks to increase the effectiveness of higher education; and the risks of temporarily waiving or modifying the Board's standard(s) or regulation(s) to advance and evaluate the pilot program are outweighed by the proposed benefits. Factors the Board shall take into consideration in making this determination include whether the proposal sufficiently:

- (a) demonstrates how it is intended to increase the effectiveness of higher education, based on validated research, similar pilots in operation elsewhere, or emergent market and/or industry best practices;**

The 96-credit applied bachelor's degree initiative seeks to address multiple challenges facing contemporary higher education, including the rising costs of undergraduate education, growing student debt, declining enrollments, significant drops in graduation and retention rates, and increased public scrutiny of the cost versus the value of higher education.

The current 120-credit bachelor's degree standard was established in American higher education when Andrew Carnegie pioneered the Carnegie Foundation for the Advancement of Teaching in 1905. The intent behind the foundation was to provide a pension system for "one of the poorest paid, but highest [most significant] professions in our nation," namely college professors.² In the early twentieth century, American higher education was unregulated, and what constituted a college was undefined. The *First Annual Report* of the Foundation, published in 1906, noted that "The terms college and university have as yet no fixed meaning on this

² Carnegie Foundation for the Advancement of Teaching, *First Annual Report*, NY: Carnegie Foundation for the Advancement of Teaching, 1906: 7.
https://www.google.com/books/edition/Annual_Report_Carnegie_Foundation_for_th/p58VAAAAIAAJ?hl=en&gbpv=1&kptab=getbook

continent...The trustees have therefore adopted for the present *an arbitrary definition* of what constitutes a college, one framed very closely after that adopted in the revised ordinances of the State of New York.” (emphasis added) The definition had three components: a College had to have at least six full-time professors, it had to require that students have four years or its equivalent of “academic or high school preparation,” and finally it must have “a course of four full years in liberal arts and sciences.”³

The 120-credit bachelor’s degree has been challenged in the past, most notably in 2009, by Senator Lamar Alexander, who unsuccessfully pushed for a three-year degree option citing the cost savings to students. Other institutions (e.g., Bates College, St. John’s University, Wesleyan University, and Ball State University) have offered so-called three-year bachelor’s degrees, but those are 120-credit programs that utilize summer and winter terms to condense coursework into a shorter time frame and have some discounts on tuition compared to their four-year counterparts.

In the summer of 2020, Dr. Robert Zemsky (University of Pennsylvania) and Dr. Lori Carrell (University of Minnesota, Rochester) invited selected higher education leaders to address the challenges of cost, quality, and time to degree by exploring the possibility of three-year degree programs, in addition to the dominant four-year option. Merrimack College was among more than a dozen other higher education institutions invited to join the national innovation project. This initial group has grown into a group called the “College-in-3 Exchange,” which as of 2025 had 68 participating institutions across the United States. The exchange currently includes a variety of private and public institutions that run the full spectrum from associate-granting through Carnegie-classified R1 and R2 doctoral-granting institutions. According to the College-in-3 Exchange’s website, “This broad institutional membership is our strength: rural and urban, faith-based and secular, selective and open-access institutions are all working to design programs that reduce costs, accelerate time to degree, and maintain excellent student outcomes. By bringing such a wide range of institutions into a Community of Practice, the Exchange demonstrates higher education’s collective capacity to innovate and respond to urgent calls for affordability, flexibility, and workforce relevance.”⁴

Over the last several years, a number of colleges and universities in the United States have developed and received approval to offer 90-96 credit bachelor’s degrees. The first to do so were BYU-Idaho and Ensign College, who developed degrees requiring students to complete the major and core requirements while eschewing the electives, which is the same structure that Merrimack is proposing.⁵ Since the creation of BYU-Idaho’s degrees, a growing number of accredited institutions across the United States have begun implementing bachelor’s degree programs requiring fewer than the traditional 120 credits. These initiatives demonstrate a national trend toward carefully designed reduced-credit pathways that maintain academic rigor while improving accessibility and efficiency. For example, Plymouth State University (New Hampshire) has introduced 96-credit programs in areas including business, cybersecurity, and

³ Carnegie Foundation *First Annual Report*, 38.

⁴ <https://college-in-3.org/who-is-joining-cin3/cin3-membership-profile/>

⁵ <https://www.byupathway.edu/degrees/program-list#viewallcertificates/#list-bachelors-degrees>

robotics.⁶ Johnson & Wales University (Rhode Island) has developed 90-credit bachelor's degrees in computer science, criminal justice, design, and hospitality management,⁷ and Northwood University (Michigan) offers a 90-credit cybersecurity bachelor's program.⁸ Other institutions have adopted similar models, including Saint Mary's University of Minnesota, which currently offers a 90-credit online bachelor's degree in psychology (and has five other degrees under review by their regional accreditor following approval by the Minnesota Office of Higher Education),⁹ and the University of Lynchburg (Virginia) which offers 96-credit programs in public health and education.¹⁰

In addition to institutional innovation, several state governments and higher education systems have begun actively encouraging or requiring the development of reduced-credit bachelor's degrees as a strategy to improve affordability and accelerate workforce entry. For example, Ohio law now requires each public state university to establish at least one accelerated ninety-credit bachelor's degree program aligned with in-demand career fields.¹¹ Similarly, Indiana enacted legislation directing its public universities to explore and implement three-year bachelor's degree options, with the goal of enabling students to complete degrees more quickly and at lower cost.¹² These state initiatives reflect a broader national shift toward reconsidering the traditional 120-credit standard and exploring alternative program structures that maintain academic quality while reducing time to completion.

At the same time, regional accrediting agencies allow reduced-credit degrees or have created or are exploring formal guidelines allowing institutions to propose reduced-credit bachelor's degree programs, further demonstrating that these models are increasingly recognized within mainstream higher education policy and accreditation frameworks. In addition to NECHE's support for reduced-credit bachelor's degrees, other regional accreditors have moved to support this innovation. In October of 2024, the Middle States Commission on Higher Education (MSCHE) noted that they do not have a 120-credit minimum requirement for bachelor's degrees and their accreditation requirements "demonstrate long-held support for three-year degrees, which do not require our prior approval."¹³ Also in 2024, the Higher Learning Commission (HLC) provided guidelines for reduced-credit bachelor's degrees.¹⁴ In the summer of 2025, the Northwest Commission on Colleges and Universities (NWCCU) Board of Commissioners approved removing the pilot designation for the current accelerated degrees at Brigham Young

⁶ <https://www.plymouth.edu/96-credit-three-year-applied-bachelors-degrees>

⁷ <https://www.jwu.edu/academics/3-year-degree/index.html>

⁸

<https://www.northwood.edu/news/northwood-university-makes-history-with-one-of-nations-first-3-year-bachelors-degrees/>

⁹ The other St. Mary's degrees under review by the Higher Learning Commission are Business Administration, Criminal Justice Leadership, Healthcare Management, Human Resource Management, and Information Technology; see <https://www.smumn.edu/90-credit-online-bachelor-degree-programs/>

¹⁰

<https://www.lynchburg.edu/university-of-lynchburg-to-offer-applied-degrees-in-public-health-educational-studies/>

¹¹ <https://codes.ohio.gov/ohio-revised-code/section-3345.89>

¹² <https://iga.in.gov/legislative/2024/bills/senate/8/details>

¹³ <https://www.msche.org/2024/10/23/myth-busting-degree-in-three-and-other-accelerated-credentials/>

¹⁴ https://download.hlcommission.org/Reduced-CreditBachelorsGuidelines_OPB.pdf

University. NWCCU also approved allowing institutions to submit substantive change proposals to offer bachelor's degrees based on specific learning outcomes within a reduced credit hour amount rather than requiring a traditional number of credit hours to the degree.¹⁵ Together, these developments indicate that reduced-credit bachelor's degrees are emerging as a credible policy innovation being adopted by institutions, accreditors, and state governments seeking to expand access to high-quality postsecondary education.

(b) demonstrates that it is responsive to: a documented need, such as labor market or student demand; changes in society, demographics, technology, educational research; or public expectations regarding postsecondary education;

The proposed 96-credit applied bachelor's degrees in business, criminal justice, psychology, and communication are designed to address both workforce demands and systemic challenges in higher education. By aligning programs with regional labor market needs in fields like business operations, public safety, behavioral health, and communication, these degrees equip students with practical, workforce-ready skills while enabling faster entry into careers. In addition, the reduced credit structure responds to rising tuition costs, student debt, declining enrollment and retention and increasing public concern about the value of a college degree, all while maintaining clear learning outcomes and academic quality.

The cost of college tuition in the United States has increased dramatically over time, rising much faster than both inflation and average household income. This steady escalation has made higher education significantly less affordable for many families, forcing students to delay enrollment, take on substantial financial burdens, or choose not to attend college at all. A three-year degree model directly addresses this issue by shortening the time required to complete a bachelor's degree, thereby reducing the number of semesters students must pay for. With fewer tuition payments, as well as reduced costs for housing, meals, and other expenses, students can obtain the same credential at a significantly lower overall price.

Along with higher tuition, student loan debt has grown to unprecedented levels as more students rely on borrowing to cover these rising costs. Many graduates leave college owing tens of thousands of dollars, which can limit their financial flexibility for years after graduation. A three-year degree helps mitigate this problem by reducing the total amount students need to borrow in the first place. By cutting a full year of expenses, students take on less debt and can enter the workforce sooner, allowing them to begin earning income and repaying loans earlier. This combination of lower borrowing and faster entry into the job market offers a way to mitigate the student debt crisis.

Previous efforts to reduce time to degree have typically required summer and winter coursework and heavier course loads during the academic year, which can increase costs and limit students' ability to engage in co-curricular activities, internships, and employment opportunities. As a result, rather than improving access or efficiency, accelerated 120-credit pathways may

¹⁵ <https://nwccu.org/news/v7i4-bachelors-degrees/>

reduce students' ability to gain the practical experiences that are critical for career readiness. By contrast, a 96-credit program helps put a bachelor's degree within reach of those who are most often excluded from higher education. This is accomplished at the same time that it opens opportunities for paid internships, career advancement, and graduate education to that more diverse pool of students.

The proposed programs also reflect broader demographic and technological shifts affecting higher education. Massachusetts, like much of the Northeast, is experiencing stagnation or decline in traditional college-age populations alongside growth in adult and nontraditional learners. In addition, in keeping with regional and national trends, fewer Massachusetts high school graduates are choosing to attend college at all, as Table 1 demonstrates.

Table 1: High School Graduates and College/University Attendance (2014-2024)¹⁶

Year	Mass High School Graduates	Number Attending College or University	Percentage	Number Attending Mass. College or University	Percentage
2014-15	65678	48082	73.2%	33672	51.3%
2015-16	67052	48868	72.9%	33529	50.0%
2016-17	67061	49374	73.6%	34027	50.7%
2017=18	67914	49092	72.3%	33731	49.7%
2018-19	68233	49233	72.2%	34571	50.7%
2019-20	68405	43773	64.0%	29366	42.9%
2020-21	68947	43224	62.7%	27797	40.3%
2021-22	68919	43028	62.4%	27473	39.9%
2022-23	66858	42231	63.2%	27097	40.5%
2023-24	66801	42390	63.5%	28086	42.0%

Before the COVID-19 pandemic, roughly seven in ten Massachusetts high school graduates went on to attend a college or university, with college-going rates consistently hovering around 72–74% from 2014 to 2019. However, beginning in 2019–2020, there was a sharp and sustained decline. The percentage of graduates attending college dropped to 64.0% in 2019–2020 and fell further to about 62–63% in the years that followed. Although there has been a slight stabilization since then, college attendance rates have not returned to pre-pandemic levels, indicating a lasting shift in postsecondary enrollment patterns.

¹⁶ Data gathered from Massachusetts Department of Education School and District Profiles. <https://profiles.doe.mass.edu/statereport/gradsattendingcollege.aspx>

A similar trend appears for students choosing to attend college within Massachusetts. Prior to the pandemic, about half of all high school graduates enrolled in in-state institutions. After COVID-19, that share dropped significantly to around 40–42% and has remained at that lower level through 2023–2024. This suggests not only that fewer Massachusetts graduates are attending college overall, but also that a smaller proportion are staying within the state for higher education, reinforcing the broader decline in college participation since the pandemic.

In addition to responding to long-standing challenges related to cost, debt, and demographic change, applied bachelor's degrees can also address local and regional workforce needs. MassHires's series of regional workforce blueprints developed across Massachusetts, provide a comprehensive, data-driven analysis of labor market trends, employer demand, and workforce gaps across the Commonwealth.¹⁷ These reports, produced through collaboration between workforce boards, educators, and industry leaders, consistently highlight a central challenge: a persistent mismatch between the skills employers need and the available workforce, alongside ongoing labor shortages in key sectors. This data suggests that three-year degrees across a wide spectrum of disciplines would be valuable; the College is proceeding with four degrees to start. These degrees were chosen because they clearly support regional workforce needs while also being relatively straightforward to offer as applied degrees.

Across these regions, the data show strong demand for workers in roles that rely on competencies developed in business, psychology, communication, and criminal justice. Employers report difficulty filling positions in management, human services, behavioral health, education, and administrative occupations, even as overall labor force participation struggles to recover. For example, the Pioneer Valley Blueprint identifies a clear “supply gap” between workers and in-demand occupations, emphasizing the need for more responsive education and training systems, while the Northeast and Central Massachusetts reports call for stronger alignment between education pipelines and employer needs to sustain economic growth .

Three-year degree programs in business, psychology, communication, and criminal justice directly respond to these findings by accelerating the preparation of students for these high-demand, cross-cutting roles. Many of the priority industries identified in the reports, such as healthcare, social assistance, education, and business services, depend on skills in leadership, communication, and human behavior. The Greater Boston Blueprint, for instance, highlights significant projected growth in behavioral health and social service occupations, while the Southeast Blueprint emphasizes the importance of aligning academic programs with employer-defined career pathways .

By reducing time to degree, three-year programs can help address both the workforce shortages identified in these reports and the broader decline in college enrollment. They offer a way to produce qualified graduates more quickly, lower the cost of education, and better align higher education with labor market demand—advancing the core goals outlined across Massachusetts' regional workforce strategies.

¹⁷ <https://www.mass.gov/lists/regional-workforce-blueprints>

Recent national research underscores strong latent demand for three-year bachelor's degree programs among prospective students and families. A 2025 Tyton Partners survey of nearly 500 families found that while only 20% of respondents were initially aware of three-year degree options, interest rose dramatically once introduced, with 73% of students and 69% of parents expressing strong interest. Notably, over 70% of both students and parents view a 90-credit bachelor's degree as equally or more valuable than a traditional 120-credit program. The findings further indicate that students drawn to accelerated pathways are highly career-oriented, motivated by reduced cost and faster entry into the workforce, and are willing to make tradeoffs to achieve these outcomes. Together, these data points suggest that well-designed three-year degree programs align closely with evolving student preferences and represent a compelling opportunity to expand access while improving time-to-degree and return on investment.¹⁸

Beyond labor market and student demand, the proposed programs are grounded in a necessary pedagogical shift in how undergraduate education is structured and evaluated. The 120-credit bachelor's degree is not the product of evidence-based learning science, but rather a historical artifact of the early twentieth century, when the Carnegie Foundation established the credit hour to determine institutional eligibility for faculty pension programs. Over time, this measure of instructional time became synonymous with learning, despite increasing recognition that time spent in a classroom does not equate to knowledge gained. As the president of the Carnegie Foundation has argued, the skills and competencies required for success in the twenty-first century are not adequately measured by time, yet higher education continues to rely on a system that conflates duration with learning.¹⁹

In response, institutions and accreditors have already begun to shift toward outcomes-based education. The widespread adoption of clearly defined learning outcomes, competency-based education models, and assessment frameworks such as the AAC&U VALUE rubrics reflects a growing consensus that learning should be measured by what students can demonstrate rather than how long they spend in a course. The proposed applied bachelor's degrees build on these developments by aligning curriculum design explicitly with demonstrated learning outcomes and workforce-relevant competencies.

Importantly, academic rigor in this model is not diminished but redefined. Rigor should not be understood as a function of time spent in the classroom, but rather as a function of the quality, depth, and intentional design of the educational experience. A rigorous program is characterized by clear learning objectives, intellectually challenging coursework, and assessments that require critical thinking, problem-solving, and the application of knowledge in complex contexts. By focusing on these elements, reduced-credit bachelor's degrees maintain—and in many cases enhance—academic rigor while eliminating excess or duplicative coursework.

Finally, these programs respond to growing public expectations for higher education to be more affordable, accountable, and aligned with economic realities. Policymakers and stakeholders increasingly expect public institutions to deliver high-quality degrees that lead to meaningful

¹⁸<https://tytonpartners.com/parents-and-students-are-attracted-to-3-year-bachelor-degrees-but-can-institutions-make-the-business-model-work/>

¹⁹ <https://www.carnegiefoundation.org/what-is-the-carnegie-unit/>

employment while minimizing student debt. By offering reduced-credit bachelor’s degrees in high-demand fields, this initiative demonstrates a commitment to innovation, efficiency, and responsiveness to the Commonwealth’s workforce priorities.

Taken together, the proposed applied bachelor’s degrees represent a strategic and evidence-based response to documented need. They align institutional offerings with labor market demand, expand access for a broader range of students, incorporate advances in pedagogy and instructional design, and meet public expectations for affordability and effectiveness in postsecondary education.

(c) identifies goals and intended outcomes, including student and program or institutional outcomes, and includes proposed measures and metrics the Board and the institution will use to evaluate the success of the initiative, including the use of an external perspective and;

The College will evaluate the success of the proposed applied bachelor’s degrees through a combination of direct and indirect assessment of student learning, student experience measures, and program- and institutional-level outcomes. These metrics are designed to assess both academic quality, the extent to which program learning outcomes are being met, and the effectiveness of the reduced-credit model in improving access, affordability, and student success. (See **Appendix B: Assessment Plan** below for more details).

Outcome	Proposed Metric(s)
Major-Specific Learning Objectives	Percentage of students demonstrating proficiency in at least three program-designated learning outcomes (direct assessment via capstones, projects, or applied evaluations)
General Education Learning Objectives	Assessment of student performance on general education outcomes using institutionally approved rubrics informed by AAC&U VALUE rubrics (e.g., critical thinking, written communication, integrative learning) based on embedded course assessments
Student Learning (Overall Program Performance)	Percentage of students meeting or exceeding proficiency benchmarks across multiple learning outcomes; aggregated direct assessment results
Student Satisfaction and Experience	Student and alumni satisfaction survey results collected at program completion and longitudinally (e.g., 1-year and 3-year follow-up)

Post-Graduation Student Success	Employment rates, job placement in field or related field, graduate school enrollment, and early career earnings; we would expect these rates to be comparable to metrics for the existing 124-credit bachelor's degrees
Program Outcomes – Cost Efficiency	Total cost at graduation (tuition and fees); comparison of average cost between 3-year and traditional 4-year program graduates; we would expect the average cost to be 70-80% of the cost of comparable 124-credit degrees
Program Outcomes – Completion	Completion rates and Time to Completion at 3-year and 5-year benchmarks; comparison with traditional 4-year program completion rates (at 4-year and 6-year benchmarks) we would expect these rates to be comparable to metrics for the existing 124-credit bachelor's degrees
Institutional Outcomes – Retention	Year-to-year retention rates (first-to-second year; second-to-third year) within the applied bachelor's programs; we would expect similar rates or higher rates than for comparable 124-credit bachelor degrees
Institutional Outcomes – Internal Transfer	Tracking transfer to and from 96-credit to 124-credit degrees

(d) demonstrates that students will not be harmed and will receive equivalent benefit from the initiative by identifying potential limitations and/or risks to students, identifying mitigation strategies to address those limitations and/or risks, and ensuring informed consent.

Merrimack College will offer students a choice of 124-credit (four-year) or 96-credit (three-year) degree options, the latter initially in four selected fields of study. These new degree options are designed to attract both price-conscious and academically-focused students, as well as a potentially more diverse pool of students.

A comparison of equivalent benefits between the 96- and 124-credit degree options can be divided into the time period students are matriculated at Merrimack and their post-baccalaureate experience. Part of the full implementation phase of this initiative is to collect the relevant data, information, and outcomes to ensure that the 96-credit degree will not harm students or limit their capacity for career and/or graduate study outcomes. Merrimack will be transparent with prospective students and their guardians and/or families regarding the innovative nature of the 96-credit degree program and will share with them the findings of the program analyses.

While matriculated, students in both the 96- and 124-credit degree programs will be taking the same major courses (with the exception of two experimental psychology courses in the applied psychology B.A. program and unique internship and professional development courses across all four majors) and general education courses. In addition, they will have: the same faculty, access to the same academic support and career development services, equal opportunities to participate in co-curricular activities, the same option for a residential experience if they choose, and the same access to all facilities and health and wellness support. Students in 96-credit programs will also have the option to change to a 124-credit degree any time before graduation.

The College currently has in place all the financial, human, information, and technological resources to support the success of the 96-credit degree initiative.

To ensure that students are well prepared for both careers and graduate studies, the College intends to build additional support for students enrolled in the 96-credit degree programs. An intentional focus on helping students identify career pathways and readiness from the moment they enroll has been integrated into all degree programs and the additional curricular, co-curricular, and extra curricular support and opportunities. Skills assessment, resume and cover letter assistance and review, interview preparation, career explorations, and salary negotiation are provided by career advisors in the O'Brien Center for Career Development.

Employer views of reduced-credit bachelor's degree

Because reduced-credit bachelor's degrees offered at American colleges and universities have not been regularly offered since the nineteenth and early twentieth centuries, one of the concerns that skeptics of this innovation have raised is that employers will look at such degrees differently than they look at "traditional" 120-credit bachelor's degrees. The available evidence strongly suggests otherwise.

For example, Johnson and Wales Chancellor Mim Runey has noted that her institution reached out to the top 30 employers of the school's graduates in each field to research whether they would hire a three-year degree graduate for the same roles as a four-year graduate. "Without hesitation, across the board, their response was favorable," she said. "The thing that is most important to students is getting into the industries that they serve."²⁰

In developing these proposed degrees, Merrimack hired Huron Consulting to assess the readiness of American employers to hire graduates of three-year bachelor's degrees. In conversations Huron held with Chief Human Resource Officers, American employers expressed support and open-mindedness at the idea of a three-year bachelor's degree, and stressed that what matters most in their hiring processes are the skills, competencies and relevant experience of job candidates. "What I look for and what can differentiate a college graduate is leadership

20

<https://www.usnews.com/education/u-s-news-higher-ground/articles/2026-02-26/three-year-bachelors-johnson-wales>

and practical experiences—evidence on their resume that they can be a functioning human in the workplace,” one Chief HR Officer of a \$3 billion American manufacturing company said. “A three-year bachelor’s degree would need to ensure it augments coursework with leadership development and experiential learning opportunities. But I wouldn’t discount a resume just because it was a three-year program versus four.” Doniel Kofel, Senior Vice President of People and Culture at Coretelligent, a Massachusetts-based IT solutions provider, agreed. “I think a three-year bachelor’s option is a great idea,” Kofel said. She and her colleague Sorcha Eastwood, Director of Talent Acquisition, were clear that what matters most at Coretelligent is professionalism, communication skills and technical skills. “If these candidates can show up in the same way or better than candidates with a four-year degree in the interview process,” Kofel said, “[the length of their degree program] makes no difference.”

Employers in Massachusetts continue to value the bachelor’s degree as an important credential, but increasingly view it as a signal of underlying skills rather than an end in itself. State and regional workforce analyses consistently emphasize the importance of cross-cutting competencies, such as communication, critical thinking, teamwork, and problem-solving. According to the Massachusetts Executive Office of Labor and Workforce Development and the Massachusetts Skills Cabinet, employers report that while degrees remain useful in screening candidates, hiring decisions are driven more directly by whether graduates can demonstrate applied skills and workplace readiness. Similarly, surveys conducted by the National Association of Colleges and Employers (NACE) show that employers prioritize competencies such as communication, teamwork, and critical thinking over specific majors or coursework, reinforcing that the value of the degree lies in the skills it represents rather than the accumulation of credits alone.

This shift is particularly pronounced in Massachusetts’ innovation-driven economy, where employers must respond to rapid technological and organizational change. Reports from the Burning Glass Institute and the Harvard Business School Project on Managing the Future of Work highlight the growing adoption of “skills-based hiring,” including in the Northeast, where employers are increasingly relaxing strict degree requirements in favor of demonstrable competencies. At the same time, Massachusetts workforce projections emphasize the need for more efficient pathways into roles in business operations, human services, communications, and public safety—fields directly aligned with the proposed applied bachelor’s degrees. These trends suggest that higher education programs must focus more intentionally on clearly defined, measurable learning outcomes and applied experiences. In this context, reduced-credit, outcomes-focused bachelor’s degrees are well positioned to meet employer expectations by ensuring that graduates leave with demonstrable skills that align with labor market demand, rather than simply completing a prescribed number of credit hours.

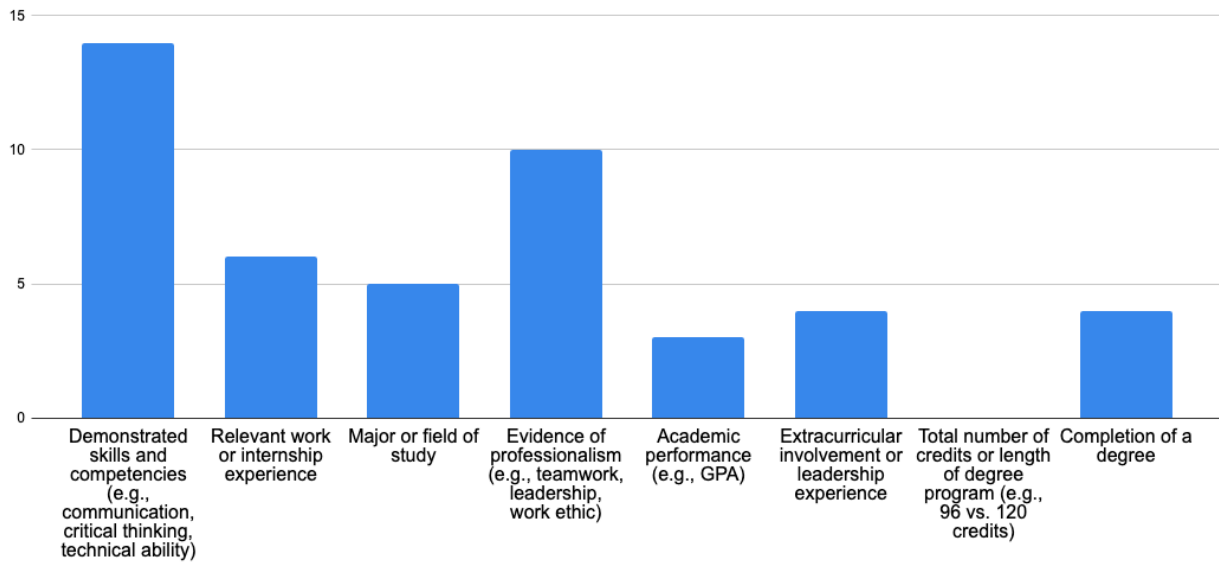
In order to more fully understand potential employer sentiment regarding applied bachelor’s degrees, Merrimack sent out a three-question survey to members of our school’s Boards of Advisors. Members of the Board of Advisors are business and community leaders who provide guidance and support to our six schools, our research enterprise, and to the College as a whole. The information provided by these members strongly suggests that what matters to employers is

not the length of the degree but the skills, competencies and relevant experiences that college graduates can demonstrate.

Survey respondents were first asked if their company or industry would be open to hiring graduates of Merrimack's 96-credit (three-year) bachelor's degrees for roles typically filled by graduates with traditional four-year (120-credit) degrees. A significant majority answered affirmatively, and only two out of 27 respondents answered "no." Instructively, both of the respondents who responded with "no" explained their response. A member of the College's Engineering and Computational Sciences Board of Advisors stated that "Our field involves engineering and construction so the time needed for in classroom and coop/internship is critical." The other respondent, a member of our Girard School of Business Board of Advisors, stated that "Deloitte is a very large company with over 250,000 employees and \$70B annual revenue. There are parts of our business (Consulting, Shared Services, internal support) where we would hire someone with 96 credit hours, but this will not work for our core Audit and Tax businesses unless there are changes in the laws around CPA requirements."

Survey respondents were then asked what was or would be most important to them when evaluating a job candidate's college experience. Respondents were given a list and asked to choose up to the three factors. Survey results from Board of Advisors members indicate a clear shift in how employers evaluate college graduates. The most heavily weighted factors are demonstrated skills and competencies, followed by evidence of professionalism such as teamwork, leadership, and work ethic. Most notably, respondents assign no importance to the total number of credits or the length of a degree program. This suggests that employers are not evaluating graduates based on time spent in school, but rather on the capabilities and behaviors they bring to the workplace.

Chart 1: Most Important Factors in Evaluating College Graduates for Jobs



Additional qualitative feedback from Board of Advisors members strongly affirms the potential of three-year degree models as an innovative and forward-looking approach to higher education. Many respondents expressed clear enthusiasm, describing the model as a “great idea,” “a smart way to address the high cost of a secondary education,” and “a way to create access & affordability.” One advisor noted they were “beyond thrilled to see [an institution] paving the way,” emphasizing that such programs position colleges “at the forefront” of needed change.

Overall, the comments reflect broad optimism and support for three-year degrees as a practical, innovative pathway that can expand access, reduce costs, and better align higher education with workforce needs, while maintaining academic quality through intentional program design. This advisory board feedback is consistent with the feedback Huron received in their conversations with business and industry leaders. And while the overall support is very positive, we also recognize that there are majors and situations that would be less suited to reduced-credit degree formats.

Reduced-credit bachelor’s degrees and graduate study

Recent research conducted by the College-in-3 Exchange on graduate admissions perspectives provides important context for understanding how reduced-credit bachelor’s degrees are likely to be received within the broader higher education ecosystem.²¹ While many graduate programs currently maintain formal policies referencing a 120-credit bachelor’s degree, the findings make clear that these policies are neither fixed nor determinative. Graduate admissions processes are already more flexible and adaptive than such policies suggest. Institutions routinely make

²¹ <https://college-in-3.org/views/policies-practices-and-perspectives/>

exceptions for well-qualified applicants, and many have established mechanisms—such as faculty committee review or graduate council petitions—to admit students who may not meet standard credit thresholds but can demonstrate readiness for advanced study.

Across institutions, graduate admissions leaders consistently emphasized that the most important factors in evaluating applicants are the depth and rigor of their academic preparation, the achievement of clearly defined learning outcomes, and evidence of applied or research experience. The total number of undergraduate credits completed was generally viewed as secondary to these indicators of student capability. In particular, faculty reviewers focus on whether applicants have mastered prerequisite knowledge, demonstrated critical thinking and analytical skills, and engaged in meaningful experiential learning. These findings reinforce a central premise of the proposed applied bachelor's degrees: that academic quality and readiness for advanced study are best measured by demonstrated learning and competencies, rather than by time spent in coursework.

The study also indicates that graduate admissions policies and perceptions are actively evolving in response to broader changes in higher education. Several respondents noted that the development of three-year bachelor's degrees in the United States is likely inevitable, with some institutions already designing such programs or responding to state-level directives to do so. As with prior innovations—such as the initial introduction of online education—early skepticism is expected to diminish as institutions gain familiarity with new models and as evidence of student success becomes available. Importantly, the study highlights that increasing awareness, transparency in program design, and clear articulation of learning outcomes are key factors in facilitating this shift.

In this context, the proposed applied bachelor's degrees are intentionally designed to align with the criteria that graduate admissions reviewers already prioritize. The programs emphasize coherent, outcomes-based curricula; robust assessment of student learning; and the integration of applied and experiential learning opportunities. By focusing on the depth and quality of student learning rather than the accumulation of credits, the College ensures that graduates are well prepared for both employment and further study. Moreover, the College will actively support graduates in articulating the rigor and structure of their degrees to graduate programs and will pursue opportunities to develop formal and informal pathways with graduate institutions. Taken together, these efforts position graduates of the proposed programs to be competitive in admissions processes that are increasingly holistic and focused on demonstrated competencies.

Merrimack College affirms its confidence in the rigor and quality of reduced-credit bachelor's degrees by committing to accept graduates of such programs, including those offered by other accredited institutions, into its own graduate programs, provided they meet established standards for academic preparation and readiness for advanced study. The College will not use total credit accumulation as a barrier to admission, and instead will evaluate applicants based on demonstrated learning, achievement of relevant prerequisites, and evidence of their capacity to succeed at the graduate level. Through this commitment, Merrimack seeks to model an

evidence-based approach to graduate admissions that reflects evolving national practice and supports broader recognition of high-quality, outcomes-focused undergraduate degree pathways.

Merrimack recognizes that the introduction of reduced-credit applied bachelor's degrees represents an innovation in program design and has carefully identified potential risks to students. The proposed programs have been intentionally designed to mitigate these risks and to ensure that students receive an educational experience and outcomes that are at least equivalent to those of students enrolled in traditional 124-credit bachelor's degree programs.

As has been noted above, one potential risk is that reduced-credit degrees may be perceived differently by employers or graduate programs. While we believe this risk is limited, the College has designed the programs to emphasize clearly defined and measurable learning outcomes, ensuring that graduates demonstrate competencies aligned with workforce and graduate school expectations. The College will provide students with guidance on how to effectively present their degrees, including articulation of learning outcomes and experiential learning components. In addition, Merrimack College will accept graduates of reduced-credit bachelor's degree programs into its own graduate programs, and will actively engage with the College-in-3 Exchange and employer advisory boards to support broader recognition of these degrees.

A second potential risk is that a reduced number of credits could result in diminished academic breadth or depth. This risk is addressed through intentional curriculum design that eliminates redundancy while preserving essential learning outcomes. Faculty have identified core disciplinary and general education competencies and structured the curriculum to ensure that all required knowledge and skills are achieved. Academic rigor is maintained through the use of direct assessment methods, including capstones, portfolios, internships, and applied learning experiences, with performance evaluated using established rubrics such as AAC&U VALUE frameworks. Outcomes will be continuously assessed to ensure that students in reduced-credit programs achieve learning results comparable to those in traditional programs.

A third potential risk relates to student progression and program fit, particularly for students who may determine that a traditional 124-credit pathway better meets their academic or career goals. To mitigate this risk, the College will maintain flexibility for internal transfer between reduced-credit and traditional degree programs. Student progress will be closely monitored through retention and completion data, and advising structures will be designed to support informed decision-making and timely intervention where needed.

A fourth potential risk concerns student success outcomes, including retention, completion, and post-graduation placement. The College will closely track these outcomes using defined metrics, including retention rates, completion rates, time-to-degree, employment outcomes, and graduate school placement. These outcomes will be benchmarked directly against those of comparable 124-credit programs, with the expectation that students in reduced-credit programs will achieve equivalent results. Cost of attendance and student debt at graduation will also be monitored, with the expectation that reduced-credit programs will result in significantly lower

costs (approximately 70–80 percent of traditional programs), thereby providing an additional benefit to students.

A fifth potential risk concerns the necessity to follow relevant NECHE transfer credit standards. For Merrimack's 124-credit degrees, students may transfer up to 90 credits (which is equivalent to 72.5% of the total credits required for the degree). To address this potential risk, students who enroll in the 96-credit degrees may transfer up to 69 credits (which is consistent percentage-wise to the 124-credit degrees), and is also consistent to NECHE's new standards 2.11 and 2.12. NECHE Standard 2.11 states that "Students complete at least one-fourth of their undergraduate credits, including substantial advanced work, at the institution awarding the degree." NECHE Standard 2.12 states that "In accepting transfer credit, the institution exercises the responsibility to ensure that students have met the stated learning goals of its programs at all degree levels. The institution does not erect barriers to the transfer of credit that are unnecessary to protect its academic quality and integrity. In the acceptance of transfer credit, the institution ensures that the proportion of intermediate and advanced coursework is sufficient to maintain the academic quality and integrity of the program.")

Finally, the College recognizes the importance of ensuring transparency and continuous improvement. Through ongoing formative and summative assessment, participation in the College-in-3 Exchange, and compliance with NECHE accreditation requirements, the College will regularly evaluate program effectiveness and make adjustments as needed. These processes provide both internal and external validation that the programs are meeting their intended goals.

Through these mitigation strategies Merrimack ensures that students participating in the proposed programs will not be harmed and will receive an educational experience and outcomes that are at least equivalent to, and in some respects enhanced relative to, those of students in traditional bachelor's degree programs.

V. Quality and Consumer Protection [610 CMR 160.06(2)]

The institution's proposal demonstrates the institution's overall ability to provide and sustain an appropriate learning environment for students and otherwise satisfies the Board's standards or regulations for degree-granting institutions of higher education. Factors the Board shall take into consideration in making this determination include whether:

(a) the proposal is consistent with the institution's existing mission;

The mission of Merrimack College is to enlighten minds, engage hearts, and empower lives and is inspired by our Catholic faith and the Augustinian tradition of seeking truth through inquiry and dialogue. Merrimack was founded in 1947 in order to address the fundamental challenge of massive demobilization following World War II. In the immediate aftermath of the war, there were serious concerns that the economy might return to the pre-war crisis of

depression and extensive unemployment, and that military veterans might struggle to adapt to civilian life. With the GI Bill and the creation of schools like Merrimack, higher education proved to be a powerful engine of economic growth and upward mobility for generations. Seventy-five years later, economic inequality and the spiraling costs of college have made it more and more difficult for a growing number of Americans to recognize the benefit of a college degree. Like those who faced depression, war, and demobilization in the mid-twentieth century, we again face significant social and economic challenges that need to be addressed directly. This 96-credit applied bachelor's degree proposal is one powerful way to address the cost of college while still providing students with a broad, deep, and rigorous education. In that way, this proposal is completely aligned with Merrimack College's mission and trajectory as an Augustinian Catholic college.

(b) For independent institutions, the proposal otherwise satisfies the Board's standards. Regulations and implementation policies and procedures as required by M.G.L. c.69, § 30, and 610 CMR 2.00 *Independent Institutions of Higher Education Standards*,

As stated above (2), The sole regulatory inconsistency identified is the 120-credit minimum set forth in 610 CMR 2.07.

(c) the institution demonstrates that it will exercise sufficient administrative and fiduciary control over the initiative, including academic programming;

The College will maintain full administrative and fiduciary control over the proposed applied bachelor's degrees, consistent with Board of Higher Education and NECHE standards. All academic programming associated with the initiative has been developed, reviewed, and approved through the College's established shared governance processes, including departmental faculty oversight, curriculum committees, and final approval by the appropriate academic leadership. The College retains sole authority over curriculum design, learning outcomes, credit structure, and academic policies, ensuring that all programs meet existing degree requirements and accreditation standards.

From an administrative and operational perspective, the initiative will be fully integrated within existing institutional structures. Responsibility for implementation and oversight will reside with designated academic and administrative leaders, including the Provost's Office, relevant academic deans, and relevant divisions or departments. Student services, including advising, financial aid, registration, and career services will be provided through the College's existing offices, ensuring consistency in student support and compliance with institutional policies.

The College will also exercise full fiduciary control over the initiative. All tuition, fees, and financial aid will be administered through established institutional systems and in accordance with state and federal regulations. Budgeting, financial oversight, and resource allocation will remain under the authority of the College's finance office, with appropriate internal controls, audit processes, and reporting mechanisms in place.

Fiduciary Control and Budget - The enrollments, revenues, and expenditures for the initiative are embedded in Merrimack's overall undergraduate enrollment model. Basically, 96-credit student enrollments are folded into the total number of students and the overall financial aid model.

Net revenue for the program will be based on tuition and fees, and in some cases room and board. All 96-credit students will have the option of living on campus if it is financially viable for them. The expenses for the programs are embedded into the faculty and personnel budgets as well as existing operational budgets because the vast majority of the curricular requirements for each of the four 96-credit programs is built primarily on existing major and general education courses that are already being offered by the College. In this way, 96-credit students will simply be enrolled in courses that are already being staffed by faculty hired by the College and the initiative will not face any additional personnel expenses in terms of course delivery.

While some might interpret a 96-credit degree as a 25% loss in tuition and room and board, the enrollment increase is expected to offset that loss. In short, we may have students staying for three years instead of four, but overall we anticipate adding more students. In addition, we anticipate many students will choose Merrimack because of the 96-credit degree option, and then choose to stay to earn a master's degree at Merrimack. All students in 96-credit programs would also be eligible for the *Double Warrior* program, whereby undergraduate alumni who complete their baccalaureate degrees at Merrimack receive a tuition discount rate of 25% for almost all master's degrees.

(d) the institution demonstrates that it has sufficient resources (e.g., financial, human, physical, and technological) to both initiate and sustain the initiative;

The College is in a strong financial position to offer the 96-credit degree option and the College has the human resources to implement, support, and sustain the initiative. The complexity of Merrimack as a growing regional university has required that the College build its financial, human, information, and technology resource infrastructure to meet the needs of the diverse array of students the College serves. This includes all student populations, in all learning modalities, and in all locations - on-ground, commuter, and remote - and will certainly include students in our 96-credit degree programs. The College's expansion of information and technology infrastructure has been critical to support the growing bandwidth, technology, and academic technology needs for our increasing student populations and our growing academic portfolio.

Human Resources - Merrimack has made a commitment to encourage, sustain, and reward our faculty; empower, inspire, and challenge our students; support and value our staff; and celebrate the successes of our alumni and community partners. One of the keys to our success over the past dozen years has been building and maintaining a sense of community for all our members and ensuring that our community is vibrant, mutually respectful, and responsible for one

another. Achieving this has required a concerted effort, from how we communicate, to how we maintain a sense of community, to our approach on compensation and benefits. Merrimack College's founding values of teaching, learning, and service inform the College's unwavering commitment to fostering unity in all aspects of the College's operations. Adding 96-credit degrees to our academic portfolio is supported by the capacity and commitment of our human resources and our community.

In fall 2025, Merrimack College had a total of 690 employees, including 197 full-time faculty, 14 faculty in administrative positions, 433 full-time staff, and 46 part-time staff. We have adequate faculty staffing to initiate the new 96-credit degree programs. If there is enrollment growth, the College has a proven track record of hiring new faculty and support staff to cater to that growth and to continue to provide excellence in our academic program delivery. The College also has a robust work-study and student employment program that in fiscal year 2025 included over 782 undergraduate students. Student employees are critical and essential contributors to the functioning and operations of the College. In turn, these student employees earn money and/or gain critical applied work experience to advance their careers. Students in 96-credit programs will have equal access to our student employment program.

Financial Resources - Merrimack prepares annual operating and capital budgets in conjunction with the College's strategic planning priorities. The academic enterprise, including the academic portfolio, academic personnel, academic support services, residential life infrastructure, and co-curricular programming, are front and center in all aspects of financial planning and budgeting and, combined, provide the framework for interpreting the financial resources of and the financial planning for the College. The 96-credit degree initiative has been incorporated into our financial planning and will be a positive contribution to our enrollments and overall financial status.

Enrollment projections are compiled by the office of undergraduate admission based on consultations with academic affairs, on the rate structure and on current retention and recruiting trends. This approach is used for the overall budget and done similarly for undergraduate, graduate, and continuing education projections. The College is and has been in a strong financial position to fuel growth at the College over the past dozen years. The launching of a new portfolio of 96-credit degrees fits into this model of successfully managing our financial resources in support of our academic mission.

Informational, Physical and Technological Resources - Over the past twelve years, the College has experienced significant enrollment growth, changing student norms and needs, an expanding and more diverse faculty, expansion of online learning, an enlarged physical footprint of the campus, broadening campus operations and student support units, and mushrooming technology needs. In response, the College has worked to upgrade and optimize the information, physical, and technological resources needed to support the growing and rapidly changing academic and co-curricular enterprises at Merrimack. In terms of physical resources, Merrimack's 240-acre campus is located in the towns of North Andover and Andover, MA. The campus has 63 buildings, including classroom buildings and other academic spaces, athletic

facilities, student residence halls, and buildings for support services. In 2024, the College opened the Shared Instrumentation and Research Facility (“SIRF”), a 7,000 square foot shared research facility for Merrimack Faculty and students, as well as industry partners, to conduct research in biology, chemistry and other disciplines of the Life Sciences. This upcoming fall 2026, the College will be opening two new residence halls with 540 beds, and open a new space in Andover that will house our creative arts program and our new architecture program. Just prior to this, in the summer of 2026, the College will open its first BioSafety Level 2 Laboratory Suite (“BSL-2”) in Palmisano Hall. In the past year the College has opened a new lecture hall, and renovated classroom buildings including the School of Engineering and Computational Sciences located at 510/530 Turnpike Street and Palmisano hall. These renovations included teaching and research laboratories, seminar rooms, classrooms, an observatory, and a greenhouse.

Merrimack’s Information Technology (“IT”) unit oversees the infrastructure for technology resources. IT’s reach spans across the College, including support for expanding and augmenting wireless networks, different enterprise software systems and their integration, card access systems, cable services, the College’s learning management system (Canvas), collaborations with the Center for Teaching and Learning Design on academic technologies, the technology help desk, and business continuity planning.

(e) the proposal speaks to degree or certificate nomenclature, and intended student outcomes, as appropriate;

To help ensure transparency and clarity for prospective students exploring the 96- and 124-credit degree options, and in keeping with the framework established by NECHE, the 96-credit degree majors will all be called applied bachelor’s degrees and will be referred to as such in all marketing materials.

(f) the proposal speaks to the integrity of the proposed initiative or degree program(s) (e.g., admissions and degree requirements) and requires students to accomplish a defined amount and quality of work, with graduates well prepared for continued study or performance in occupations related to the program of study; and

Students in the applied bachelor’s programs are required to complete a clearly defined and rigorous course of study totaling 96 credits, typically completed over six semesters at a standard full-time load. The programs include the same general education curriculum as traditional 124-credit degrees and a fully developed major with substantially overlapping learning outcomes and course requirements. The primary structural difference is the reduction of elective coursework, rather than any reduction in core academic content or expectations. Students engage in sequenced coursework, applied projects, and, in many programs, extensive experiential learning components such as internships, ensuring both the amount and quality of work remain consistent with degree-level expectations. Internships are required for two of the

four proposed degrees, and are recommended in the other two. Merrimack will assist students in securing relevant internships through the resources and guidance provided by the O'Brien Center for Career Development. These internships may be paid or unpaid, and the internship experience will be assessed through the internship course that students will take as part of the degree program.

The curriculum is intentionally designed to be coherent, outcomes-driven, and aligned with both disciplinary standards and workforce competencies. Faculty have identified essential learning outcomes and eliminated redundancy to ensure that each course contributes meaningfully to student learning. Academic rigor is defined not by time spent in the classroom, but by the depth, quality, and intentional design of learning experiences, including assignments that require critical thinking, problem-solving, and application of knowledge in real-world contexts .

Graduates of the proposed programs will be well prepared for both continued study and employment in fields such as business, criminal justice, psychology, and communication. The programs emphasize clearly defined, measurable competencies and incorporate applied and experiential learning opportunities that align with employer expectations for workforce readiness. Evidence from employer engagement and national research indicates that hiring decisions are driven primarily by demonstrated skills, competencies, and practical experience rather than total credit accumulation. Similarly, graduate admissions practices increasingly prioritize academic preparation, learning outcomes, and applied experience over strict credit thresholds, positioning graduates of these programs to be competitive for advanced study .

Finally, the College will ensure ongoing program quality through robust assessment of student learning outcomes, including direct measures such as capstones, projects, and applied evaluations, as well as broader indicators such as retention, completion, and post-graduation success. These outcomes will be benchmarked against traditional 124-credit programs, with the expectation of comparable results. Through continuous assessment and participation in national initiatives such as the College-in-3 Exchange, the College will maintain rigorous standards while contributing to a growing evidence base supporting the effectiveness of reduced-credit bachelor's degrees.

(g) marketing of the initiative or degree program(s) will be clear and transparent with the institution publicly disclosing whether the pilot may limit a student's future eligibility for transfer opportunities, continued study, or employment and ensuring that all participating students have informed consent of the pilot nature of the initiative.

Merrimack has a history of successfully recruiting and retaining students despite a highly competitive higher education landscape. Our success is anchored primarily in our agility and willingness to innovate and in our unwavering commitment to student success. The 96-credit degree will be clearly explained to prospective students and their guardians and/or families, as will the innovative nature of the degree programs. We also believe the initiative will position Merrimack College as a pioneer to those concerned with access and affordability in higher education in the United States.

To help ensure transparency and clarity for prospective students exploring the 96- and 124-credit degree options, the 96-credit degree majors will all be called applied bachelor's degrees and will be referred to as such in all marketing materials, and the following disclosure will be included as part of program marketing and the admissions process.

Merrimack College has launched an innovative option for students to obtain their applied bachelor's degrees in three years with just 96 credits. The College's accreditor, the New England Commission of Higher Education (NECHE), has approved these applied reduced-time and reduced-credit programs in lieu of the standard program that takes four years with 120 credits.

Given the novel nature of the programs, students should be aware of the following:

- *Applied bachelor's programs are best suited to students committed to a particular field or discipline, students who have a clear career objective, and/or students who are focused on pursuing near-term employment in their chosen industry as practitioners.*
- *To enable students to complete the applied programs in less time and with fewer credits, these programs will be highly structured with limited elective credits.*
- *Merrimack's applied bachelor's programs are eligible for Title IV federal financial aid. However, students who leave Merrimack having completed an applied bachelor's degree (or any bachelor's degree for that matter) but later choose to return to Merrimack or attend another institution to complete additional undergraduate credits, either to earn a Certificate of Post-baccalaureate Studies or to earn a second baccalaureate degree, will not be eligible for federal grant aid and may have limited eligibility for other federal aid programs. For more details, see Federal Subsidized & Unsubsidized Loans and Federal Pell Grants.*
- *Given that Merrimack's applied bachelor's programs are designed to be completed within three years, students can expect to save a full year of tuition fees and related costs, including room and board, assuming they complete the program within the expected time frame.*
- *Merrimack's applied bachelor's programs will be sufficient to meet admission requirements for Merrimack's master's degree programs. However, other institutions may have different admission requirements, and such institutions may not accept Merrimack's applied bachelor's program as sufficient for admission.*
- *Merrimack's applied bachelor's programs will be available for the following degrees:*
 - *Applied Bachelor of Arts in Psychology*
 - *Applied Bachelor of Arts in Communication*
 - *Applied Bachelor of Arts in Criminal Justice*
 - *Applied Bachelor of Science in Business Administration*

As part of the admissions process, students will be required to acknowledge that they are participating in a pilot program offered under Massachusetts Board of Higher Education's Degree Regulations for Pilot Proposals on Innovation.

VI. Appendix A: Program Overviews and Description, Program Learning Outcomes and Curriculum Map

The following four 96-credit applied bachelor's degrees are the first four degree programs Merrimack proposes to offer starting in fall 2027, pending BHE approval of the initiative.

1. Applied Bachelor of Arts in Psychology
2. Applied Bachelor of Arts in Communication
3. Applied Bachelor of Arts in Criminal Justice
4. Applied Bachelor of Science in Business Administration

A. Applied Bachelor of Arts in Psychology

Program Overview

The 96-credit degree is a robust and comprehensive program that prepares students for a wide variety of career pathways while also positioning them competitively for graduate study. Graduates may pursue careers in areas such as mental health support, human services, case management, behavioral health, research assistance, human resources, organizational behavior, education, and community outreach. Despite its streamlined structure, the program is comparable to a traditional 124-credit degree when applying to master's and other advanced degree programs. Students are especially well prepared for Merrimack's M.S. in Clinical and Mental Health Counseling, the M.Ed. in School Counseling, Master of Social Work and Master's of Industrial/Organizational (I/O) Psychology programs. A defining feature of the program is its emphasis on experiential learning: students complete four semesters of scaffolded internships, providing an exceptional depth of hands-on experience that exceeds what is typically offered in traditional four-year psychology programs. Combined with equally rigorous coursework across diverse areas of psychology, this program ensures that graduates develop the knowledge, skills, and professional readiness needed to pursue a broad range of careers or further studies in psychology-related graduate programs.

Target Audience

- Students with strong interpersonal skills and students who are interested in working with people
- Students with an interest in the human mind, behaviors, development, neuroscience, and psychological disorders
- Students with an interest in psychological counseling, human services, or research-based professions

Curriculum Highlights

- Breadth of exposure to a variety of psychological disciplines
- Hands-on and project-based learning experiences through research labs, internships, and unique course sequences
- Robust experiential learning and professional development focus

Career Pathways

- Common professional pathways: human resources, counseling, social work, applied behavioral analysis, management, I/O, marketing, children's advocacy, sports psychologist
- Opportunity to participate in Merrimack's *Double Warriors* program by taking a graduate course (no charge) as an open elective in their 3rd year
- Graduate programs: e.g. clinical and mental health counseling, social work, and school counseling

Differences Between Applied Bachelor's (96-credit) and Bachelor's (124-credit)

- In place of a single semester internship requirement, we are requiring two year-long scaffolded internships. This requires creating two 2-course sequences: Internship and Professional Development I and II, and Internship and Professional Development III and IV.
- In place of two semester-long professional development courses, we are requiring professional development in conjunction with the year-long internships.

Program Learning Outcomes

Upon completion of the program, students will be able to:

1. **Demonstrate knowledge of fundamental principles of human behavior and experience**, including major psychological theories, concepts, and perspectives.
2. **Apply analytic reading skills** to interpret, evaluate, and synthesize scholarly and empirical literature in psychology.
3. **Employ theoretical analysis and critical thinking skills** to examine psychological questions, evaluate evidence, and construct well-supported arguments.
4. **Communicate effectively in oral and written formats**, presenting ideas clearly and persuasively to diverse audiences.
5. **Demonstrate proficiency in statistical and research methodologies**, including the ability to design, analyze, and interpret psychological studies.
6. **Collaborate effectively in group settings**, demonstrating teamwork, interpersonal communication, and problem-solving skills.
7. **Utilize information literacy and technology skills** to locate, evaluate, and apply credible sources and digital tools in academic and professional contexts.
8. **Analyze ethical issues in psychology**, applying established ethical standards to research, practice, and professional decision-making.
9. **Demonstrate an understanding and appreciation of human diversity**, including the influence of cultural, social, and individual differences on behavior and experience.

Curriculum Map for Existing 124-Credit Major in Psychology, B.A. (58 Major Credits)

Note there are an additional 12 credits of required electives in Biology or Health Sciences and Psychology.

Learning Outcome/Course	PSY 1000	PSY 1100	PSY 2110	SR** Psy	I** Psy	PSY 1111*	PSY 1112*	PSY 4950	PSY 3150	PSY 3120	PSY 4900	PSY Elec	PSY Elec
Understanding of fundamental aspects of human behavior and experience	X			X	X			X	X	X	X	X	X
Analytic reading skills	X	X									X		
Theoretical analysis and critical thinking skills		X	X					X			X		
Oral and written communication skills		X				X	X	X			X		
Statistical and methodological skills		X	X						X	X	X		
Group interaction and collaborative skills		X	X						X	X	X		

Information literacy and technology skills		X	X							X	X		
Understanding of ethical issues in psychology		X	X			X		X	X	X	X		
Appreciation of human diversity	X			X	X						X		

* 1-credit course

** SR = Social Relations course; I = Individuation course

Proposed 96-Credit Major in Applied Psychology, B.A. (60 Major Credits)

Note there are an additional 4 credits of required electives in psychology.

Learning Outcome/Course	PSY 1000	PSY 2310	PSY 2150	PSY 1100	I*	PSY 3920	PSY 3950	PSY 4920	PSY 4950	PSY 3150	PSY 3120	PSY 4900	PSY Elec	PSY Elec
Understanding of fundamental aspects of human behavior and experience	X				X	X	X	X	X	X	X	X	X	X
Analytic reading skills	X		X	X								X		
Theoretical analysis and critical thinking skills		X	X	X		X	X	X	X			X		
Oral and written communication skills				X		X	X	X	X			X		
Statistical and methodological skills		X	X	X						X	X	X		
Group interaction and collaborative skills		X	X	X						X	X	X		
Information literacy and technology skills		X	X	X							X	X		
Understanding of ethical issues in psychology		X	X	X		X	X	X	X	X	X	X		
Appreciation of human diversity	X	X			X							X		

* SR = Social Relations course; I = Individuation course

Sample Course Map - Applied Bachelor of Arts in Psychology

Total Major Credits: 60

Year One						
Fall	Cred	Req	Spring	Cred	Req	
PSY 1000 Intro to Psychology (SOSC)	4	G, M	Individuation Psy Course*	4	M	
FC Core Course (HUM)	4	G	PSY 2150 Brain Sciences	4	M	
RTS 1001 Intro Religion/Theology (RTS)	4	G	SOJ 1000 Intro to Social Justice (CS)	4	G	
FYS 1947 First Year Seminar: Who am I? (FYS)	4	G	PSY 2460 Abnormal Psychology	4	ME	
Total Semester Credits	16		Total Semester Credits	16		

Year Two					
Fall	Cred	Req	Spring	Cred	Req
PSY 3920 Internship + Prof Dev I	4	M	PSY 3950 Internship + Prof Dev II	4	M
PSY 1100 Psych Inquiry (W)	4	M	DES 2840 Visual Story Telling (Core Cert.)	4	G
COM 3360 Visual Communication (Core Cert.)	4	G	PSY 2110 Psych Stats (Q and SOOSC)	4	G, M
Open Elective	4	O	Open Elective	4	O
Total Semester Credits	16		Total Semester Credits	16	

Year Three					
Fall	Cred	Req	Spring	Cred	Req
PSY 4920 Internship + Prof Dev III	4	M	PSY 4950 Internship + Prof Dev IV	4	M
PSY 4900 Psychology Seminar	4	M	PSY 3120 Cognitive Psychology + Lab	4	M
PSY 3150 Behavioral Neurosci + Lab	4	M	Social Relations Psy Course (2000 level)**	4	G, M
ENG 2150 Intro to Creative Writing (W and Core Cert.)	4	G	PSY 2280 Organizational Psychology (SOOSC)	4	ME
Total Semester Credits	16		Total Semester Credits	16	

G = Gen Ed Requirement; M = Major Requirement; ME = Major Elective; O = Open Elective

*Individuation Psy Course (2 courses to choose from: PSY 2310 Lifespan Developmental Psychology, PSY 2400 Personality, PSY 2460 Abnormal)

**Social Relations Psy Course (3 courses to choose from: PSY 2200 Social Psychology, PSY 2270 Group Dynamics, PSY 2310 Lifespan Developmental Psychology);

*** With a Content Creation Certificate for General Education

Note: This is a sample curriculum map. Students may progress toward graduation using alternative pathways.

B. Applied Bachelor of Arts in Communication

Program Overview

The Applied Bachelor of Arts in Communication is a versatile degree that can lead to many different kinds of careers, including those in advertising, athletic communications, social media marketing, public relations, human resources, higher education, event planning and management, and more. Students will work on their critical and creative thinking, professional writing, public and persuasive speaking, and media production skills across courses like Public Communication, Writing for Strategic Communication, Sports Communication, Health Campaigns, Live Media Production, Conflict Management, and Persuasion and Social Influence.

An Applied Bachelor of Arts in Communication degree can also help students prepare for graduate school, especially professionally-oriented programs like Merrimack College's M.A. in Communication as well as graduate programs in Marketing, Management, and more. If students are interested in pursuing a graduate degree, they will be encouraged to take at least two 4000-level communication courses to help prepare them for learning more advanced communication theories and research processes.

The 96-credit Applied Bachelor of Arts in Communication consists of the 40-credit major, 40-credit FC Core, and 16 credits of open electives in which students can take any courses pertinent to their professional goals, including an additional certificate in the FC Core. Since the FC Core has a built-in credential, either in the form of a minor or certificate, students completing the Applied Bachelor of Arts in Communication could choose to also complete a Public Relations minor through the FC Core and still have enough room to complete a variety of additional 3-course certificate, such as Content Creation, Digital Media Production, Graphic Design, Film Studies, Ethics, Political Science, and more.

Target Audience

Traditional and non-traditional students interested in communication, including public relations and media production.

Curriculum Highlights

- Maximizes curricular flexibility by allowing students to take additional 3000-level communication courses, which are more skills-based and creation-focused.
- Hands-on and project-based learning experiences through internships, media production courses, and professionally-oriented communication courses.

Career Pathways

- 3 + 1 year graduate program in Communication, Marketing, Management, and so on.
- Career in professional communications

Differences Between Applied Bachelor's (96-credit) and Bachelor's (124-credit)

- The Applied Bachelor of Arts in Communication allows for greater student flexibility in choosing any 3000 or 4000-level courses in the Communication major rather than a specific

number at each level. This allows students to focus on “applied” or praxis-oriented courses befitting the major.

- The Applied Bachelor of Arts in Communication allows students to pick one of Communication & Media’s “large lecture” introductory courses, COM2401 Media & Culture or COM2801 Communication & Society. This gives students the ability to further tailor the major to their specific communication interests while still giving them a foundational understanding in the field of communication.

Program Learning Outcomes

- Understand a breadth of communication theories and apply those theories to make sense of communication in the everyday world.
- Demonstrate knowledge of the ethics that enables responsible and sensitive communication.
- Demonstrate knowledge of the communication discipline and its societal and professional implications.
- Prepare and present effective messages in a variety of contexts.
- Construct well-reasoned arguments and articulate them clearly. Participate in the exchange of ideas resulting in personal growth and social change.

Program Learning Outcomes and Curriculum Map of the 124-Credit Degree

Learning Outcome/Course	Course	Course	Course	Course	Course	Course	Course	Course	Course	Course	Course	Course	Course
Understand a breadth of communication theories and apply those theories to make sense of communication in the everyday world.	1020 Public Com	2010 Communication Inquiry	2410 Media & Culture	2801 Com & Society	3312 Media Criticism	3350 Media Industries	3360 Visual Com	3401 Public Relations	3420 Film Experience	3586 Sports comm	4350 Misinformation	4510 Persuasion	4633 Interpersonal Com
Demonstrate knowledge of the ethics that enables responsible and sensitive communication.	2010 Communication Inquiry	3355 Media, Cultural and Identity	3360 Visual Com	3401 Public Relations	3586 Sports Com	3621 Conflict Management	4510 Persuasion						
Demonstrate knowledge of the communication discipline and its societal and professional implications.	2010 Communication Inquiry	2410 Media & Culture	2531 Intercultural Com	2801 Com & Society	4900 Senior Seminar	3360 Visual Com	3420 Film Experience	3625 Health Campaigns	3586 Sports Com	4500 Com Advocacy	4543 Lying and Deception	4750 Leadership & Collaboration	4740 Organizational Com
Prepare and present effective messages in a variety of contexts.	1020 Public Com	3011 Writing for Strategic Com	3312 Media Criticism	3401 Public Relations	3452 Journalism and Content Creation I	3453 Journalism and Content creation II	3422 Field Production	3423 Live Media Production	3621 Conflict Management	4510 Persuasion	COM 3586 Sports Com	4500 Com Advocacy	

Construct well-reasoned arguments and articulate them clearly. Participate in the exchange of ideas resulting in personal growth and social change.	1020 Public Com	2010 Com Inquiry	2401 Media & Culture	3355 Media, Culture, and Identity	3401 Public Relations	3452 Journalism and Content Creation I	3453 Journalism and Content creation II	4500 Com Advocacy	4500 Com Advocacy	4510 Persuasion			
Participate in the exchange of ideas resulting in personal growth and social change.	2401 Media & Culture	2531 Intercultural Com	3312 Media Criticism	3355 Media, Culture, and Identity	3452 Journalism and Content Creation I	3453 Journalism and Content creation II	4100W Humor and Media	4633 Interpersonal Com	4520 Gender and Com	550 Food as Com			

Program Learning Outcomes and Curriculum Map of the proposed 96-Credits Degree

Learning Outcome/Course	Course	Course	Course	Course	Course	Course	Course	Course	Course	Course	Course	Course	Course
Understand a breadth of communication theories and practically apply those theories in creating communication and media projects	1020 Public Com	3011 Writing for Strategic Com	3312 TV Media Criticism	422 TV Production	3423 Field Production	3424 Post Production	3450 Photography	3586 Sports comm	3625 Health Campaigns	3801 Directed Study Praxis	3850 Com Internships		
Demonstrate knowledge of the ethics that enables responsible and sensitive communication.	2010 Research Inquiry	2531 Intercultural Com	3355 Media, Cultural and Identity	3360 Visual Com	3401 Public Relations	3586 Sports Com	3621 Conflict Management	4510 Persuasion					
Prepare and present effective messages in a variety of contexts.	1020 Public Com	3011 Writing for Strategic Com	3312 Media Criticism	3401 Public Relations	3452 Journalism and Content Creation I	3453 Journalism and Content creation II	3422 Field Production	3423 Live Media Production	3621 Conflict Management	COM 3586 Sports Com	3625 Health Campaigns	4500 Com Advocacy	4510 Persuasion
Appropriately use media technologies to create and share information	3420 The Film Experience	3423 Live Media Production	3423 Field Production	3424 Post production	3450 Photography	3453 Journalism and Content Creation II	3586 Sports Comm	3801 Directed Study Praxis	4850 Experiential Directed Study	4900 Senior Seminar			
Engage in applied experiences that support one's own personal and professional growth	1020 Public Com	3011 Writing for Strategic Com	3355 Media, Cultural and Identity	3420 Film Experience	3452 Journalism and Content Creation I	3453 Journalism and Content creation II	3621 Conflict Management	3742 Com and Non-Profit Organizing	3801 Directed Study Praxis	4633 Interpersonal Com	4705 Leadership and Collaboration	4850 Experiential Directed Study	4900 Senior Seminar

Sample Course Map - Applied Bachelor of Arts in Communication

Total Major Credits: 40

Year One					
Fall	Cred	Req	Spring	Cred	Req
COM 1020 Public Communication	4	M	COM 2801 Communication & Society or COM 2401 Media & Culture	4	M
COM 2531 Intercultural Communication	4	M	FC Core Course (HUM)	4	G
RTS 1100 Intro to Christianity (RTS)	4	G	FC Core Course (CS)	4	G
FYS 1947 First Year Seminar: Who am I? (FYS)	4	G	FC Core Course (STEM/Q)	4	G
Total Semester Credits	16		Total Semester Credits	16	
Year Two					
Fall	Cred	Req	Spring	Cred	Req
COM 2010 Communication Inquiry (W)	4	G, M	3000 or 4000 Level COM Course	4	ME
3000 or 4000 Level COM Course	4	ME	FC Core Credential (Core Minor)	4	G
FC Core Course (SOSC)	4	G	FC Core Credential (Core Minor)	4	G
FC Core Credential (Core Minor)	4	G	Open Elective	4	O
Total Semester Credits	16		Total Semester Credits	16	
Year Three					
Fall	Cred	Req	Spring	Cred	Req
3000 or 4000 Level COM Course	4	ME	COM 4900 Senior Seminar	4	M
3000 or 4000 Level COM Course	4	ME	3000 or 4000 Level COM Course	4	ME
FC Core Credential (Core Minor)	4	G	Open Elective	4	O
Open Elective	4	O	Open Elective	4	O
Total Semester Credits	16		Total Semester Credits	16	

G = Gen Ed Requirement; M = Major Requirement; ME = Major Elective; O = Open Elective

Note: This is a sample curriculum map. Students may progress toward graduation using alternative pathways.

C. Applied Bachelor of Arts in Criminal Justice

Program Overview

The applied Bachelor of Arts in Criminal Justice is a 96-credit applied bachelor's degree with a career-focused curriculum. The criminal justice system is the operation and administration of law, court systems, police, parole officers, corrections officers, victim advocates and others who work within our systems of justice. Criminal Justice courses are practical and cover topics such as criminal investigation or police procedures. Students enrolled in the 96-credit Criminal Justice program will study the agencies of social control: police, courts, and corrections, as well as crime prevention and victim advocacy. The main focus in the 96-credit degree program will be the practical workings of the criminal justice and juvenile justice systems. The curriculum is designed to prepare students to enter careers within law enforcement, the courts, advocacy, and corrections, as well as related public safety agencies.

Target Audience

- Students who seek a concentrated criminal justice curriculum that puts careers in the criminal justice field at the forefront
- Students who want to work with juvenile justice and adult offenders in various jobs such as police officers, probation and parole officers, law clerks, corrections officers, and victim advocacy
- Students who wish to pursue a Bachelor's Degree at an affordable price
- Students who want to graduate in three years and matriculate into the Master's of Science in Criminology and Criminal Justice (MSCCJ), a one-year degree, with or without the option to attend a Massachusetts Municipal Police Training Committee (MPTC) Academy at the same time

Curriculum Highlights

- Career-focused classes and internships
- Students graduate in three years ready to enter the job market or into graduate degree programs
- Academically rigorous courses delivered in a redefined, concentrated format
- Students achieve applied skills that will carry over into the workforce

Career/Graduate School Pathways

- Direct path into the Department of Criminology and Criminal Justice's 3+1 or 3+2 Master's Program (MSCCJ, with or without MCPA certification)
- Direct path into other related Master's degrees at Merrimack College, e.g., Master's of Social Work, Clinical Mental Health Counseling, Master's of Public Administration
- Readiness for other Master's level programs elsewhere
- Career-ready for jobs in law enforcement, the court systems, human service agencies, jails and prisons

Differences Between Applied Bachelor's (96-credit) and Bachelor's (124-credit)

The 96-credit degree consolidates the content of the 124-credit curriculum and focuses on criminal justice, juvenile justice, and court systems--how they operate, and how to prepare for

various occupations and professions within those systems. This degree is less theoretical than the 124-credit degree program and concentrates on the applied, practical aspects of the Criminology and Criminal Justice 124-credit degree.

Student Learning Outcomes

Upon completion of the program, students will be able to:

1. Analyze the causes of crime using major theoretical frameworks, including sociological, psychological, and biological perspectives.
2. Demonstrate knowledge of the criminal justice and juvenile justice systems, including their structure, functions, and key processes from law enforcement through adjudication and corrections.
3. Examine the impact of inequality, bias, and differential outcomes within the criminal and juvenile justice systems.
4. Apply critical thinking and writing skills to evaluate policies, research, and practices within criminal justice contexts and to construct well-supported arguments.
5. Communicate effectively in oral formats, presenting analyses and recommendations clearly to diverse audiences.
6. Demonstrate proficiency in research methods and statistical analyses, including the ability to interpret crime data and evaluate empirical studies related to crime and justice.
7. Apply ethical principles to issues in criminal and juvenile justice, including decision-making in professional and policy contexts.
8. Demonstrate career readiness skills, including job search strategies, professional networking, writing skills specific to the field, and an understanding of career pathways within criminal and juvenile justice **systems**.

Program Learning Outcomes and Curriculum Map of the Existing 124-Credit Degree (44 Major Credits)

Learning Outcome/Course	CRM 1000	CRM 1100	CRM 3000	CRM 4000	CRM 4500	CRM 4800	CRM Elec	CRM Elec	CRM Elec	CRM Elec	CRM Elec
Understanding the causes of crime	X	X	X	X	X		X	X	X	X	X
Understanding the various stages of the criminal justice (cj) and juvenile justice (jj) systems		X	X	X		X		X		X	
Understanding inequality, bias, and differential outcomes within the criminal and juvenile justice systems	X	X	X				X		X		
Critical thinking and writing skills	X	X	X	X	X	X	X	X	X	X	X
Theoretical analysis	X		X				X	X	X	X	X
Oral communication skills	X	X	X	X	X	X	X	X	X	X	X

Statistical and methodological skills				X	X							
Understanding ethical issues within the cj systems	X	X	X			X		X		X		

Learning Outcomes and Curriculum Map of the Proposed 96-Credit Degree (48 Major Credits)

Learning Outcome/Course	CRM 1000	CRM 1100	CRM 2000	CRM 2100	CRM 2700	CRM 3000	CRM 3100 W	CRM 4250	CRM 4800	CRM Elec	CRM Elec	CRM Elec
Understanding the causes of crime	X	X	X	X	X	X		X		X	X	X
Understanding the various stages of the criminal justice (cj) and juvenile justice (jj) systems		X	X	X	X	X			X		X	X
Understanding inequality, bias, and differential outcomes within the criminal and juvenile justice systems	X	X	X	X	X	X				X	X	X
Critical thinking and writing skills	X	X	X	X	X	X	X	X	X	X	X	X
Oral communication skills	X	X	X	X	X	X	X	X	X	X	X	X
Understanding statistical and methodological practices	X							X		X		
Understanding ethical issues within the cj systems	X	X	X	X	X	X	X		X			
Job acquisition skills, professional writing skills, and career networking within the cj and jj systems							X		X			

Sample Course Map - Applied Bachelor of Arts in Criminal Justice

Total Major Credits: 48

Year One					
Fall	Credits	Req	Spring	Credits	Req
CRM 1000 Intro to Criminology (SOSC)	4	G, M	CRM 1100 The CJ System (SOSC)	4	M
FC Core Culture and Society Class	4	G	CRM 2700 Ethics in CJ (SOSC)	4	M
FYS 1947 First Year Seminar: Who am I? (FYS)	4	G	FC Core RTS Class	4	G

FC Core Social Science Class	4	G	FC Core Humanities Class	4	G
Total Semester Credits	16		Total Semester Credits	16	

M = Major Requirement; G = Gen Ed Requirement; ME = Major Elective; O = Open Elective

Year Two					
Fall	Credits	Req	Spring	Credits	Req
CRM 2100 Crim Courts and Sentencing (SOSC)	4	M	CRM 2000 Youth, Deviance and Crime (SOSC)	4	M
CRM 3000 Society and Law (SOSC)	4	M	CRM 4250 Research Methods and Statistics in CJ	4	G, M
FC Core STEM Class	4	G	FC Core Credential Class (Core Cert.)	4	G
FC Core Credential Class (Core Cert.)	4	G	FC Core Credential Class (Core Cert.)	4	G
Total Semester Credits	16		Total Semester Credits	16	

Year Three					
Fall	Credits	Req	Spring	Credits	Req
FC Core Credential Class	4	G	CRM 3100 CJ Career Explorations (W)	4	G, M
CRM 4800 Internship in CJ	4	M	CRM Elective	4	M
CRM Elective	4	ME	Open Elective	4	O
CRM Elective	4	ME	Open Elective	4	O
Total Semester Credits	16		Total Semester Credits	16	

Note: This is a sample curriculum map. Students may progress toward graduation using alternative pathways.

D. Applied Bachelor of Science in Business Administration

Program Overview

The Applied Business Administration degree is a streamlined general business degree focused on applied learning and career readiness. Students enrolled in this 96-credit program will develop practical competences such as the ability to communicate effectively and persuasively in a business environment, to be a valuable member and a leader in a collaborative process, to analyze data, to identify and solve problems, and others. The curriculum includes valuable active learning components, such as a business experiential requirement, that effectively transfer the responsibility of learning from the professor to the students. Students will graduate from this program with the competencies they need to achieve optimal employability and with the motivation to be life-long learners. This program is ideal for students interested in adding flexibility and optionality to their professional careers. The Applied Business Administration degree will allow students to pursue a wide range of professional pathways, such as sales, marketing, project management, entrepreneurship, general administration, and finance. Students will also have the option to pursue a professional graduate degree in any business area.

Target Audience

- Motivated students interested in pursuing a general business degree to advance and add flexibility to their professional careers
- Students that face barriers to entry into a traditional four year business degree due to monetary, time, or other personal constraints
- Students with an associate degree interested in obtaining their bachelor's degree in one year

Curriculum Highlights

- Breadth of exposure to the different areas of business courses)
- Opportunity to further explore specific areas of interest (with 2 major electives)
- Streamlined business program with a focus on soft skills and career readiness
- Focus on active and applied learning with an experiential business requirement Ability to graduate in three years and be prepared to transition into a specialized master program in the fourth year

Career/Graduate School Pathways:

- Specialized graduate programs in the different business disciplines: e.g. finance, accounting, business analytics
- Common professional pathways: sales, marketing, entrepreneurship, business analysis, human resources, project management, insurance, supply chain management, financial analysis, consultancy, public relations, general administration

Differences Between Applied Bachelor's (96-credit) and Bachelor's (124-credit)

- Merrimack does not currently offer a four-year B.S. in Business Administration. Students choose a B.S. in either Accounting, Finance, Applied Economics and Finance, Management, Marketing, Entrepreneurship or Sport Management. The proposed three-year program is a general business degree that does not require students to concentrate in a specific business discipline. Students in the three-year degree are required to take two business electives (E) so that they can delve deeper into one or more of the business disciplines.
- The four-year degrees do not require all students to take MGT 3430: Ethics and Social Responsibility and MGT 3440: Workplace and Culture while the three-year degree has MGT 3430 and MGT 3440 as both a major and general education requirement.

Student Learning Outcomes

Upon completion of the program, students will be able to:

1. **Produce professional written documents** that communicate ideas clearly, effectively, and persuasively for a range of audiences and purposes.
2. **Communicate business concepts effectively**, using appropriate oral and written communication strategies.
3. **Collaborate effectively in team environments**, functioning as both a contributing member and a leader.
4. **Apply collaboration processes and strategies** to achieve team goals and improve group performance.
5. **Analyze data to generate insights**, supporting decision-making and problem-solving.
6. **Identify and define complex problems**, clearly articulating key issues and constraints.
7. **Develop creative and feasible solutions** to address identified problems.

Program Learning Outcomes and Curriculum Map of the Existing Management, B.S. 124-Credit Degree (52-60 Major Credits)

Learning Outcomes /Course	ACC 2203	ECO 1201	FIN 2500	MGT 1100	MGT 2150	MGT 3110	MGT 3120	MGT 3130	MGT 4100 W	MKT 2205	GSB Exp
ANALYZE DATA											
Prepare and analyze data	X	X	X	X	X				X		
Summarize and interpret information	X	X	X	X	X				X		
COMMUNICATE											

Deliver professional presentations				X						X	X
Write professional documents				X				X	X	X	X
COMMUNICATE											
Apply collaboration processes				X			X	X		X	
SOLVE PROBLEMS											
Identify and define a problem	X	X	X	X	X	X		X			
Develop creative alternatives to address a problem			X	X	X	X		X			

Program Learning Outcomes and Curriculum Map for proposed 96 credit degree program (56 majors credits)

Learning Outcomes /Course	ACC 2203	ECO 1201	FIN 2500	MGT 1100	MGT 2150	MGT 3120	MGT 3130	MGT 3430	MGT 3440	MGT 4100 W	MKT 2205	GSB Exp
ANALYZE DATA												
Prepare and analyze data	X	X	X	X	X					X		
Summarize and interpret information	X	X	X	X	X					X		
COMMUNICATE												
Deliver professional presentations				X				X	X		X	X
Write professional documents				X			X	X	X	X	X	X
COLLABORATE												
Apply collaboration processes				X		X	X	X	X		X	
SOLVE PROBLEMS												
Identify and define a problem	X	X	X	X	X		X	X	X			
Develop creative alternatives to address a problem			X	X	X		X	X	X			

Sample Course Map - Applied Bachelor of Science in Business Administration

Total Major Credits: 56

Year One					
Fall	Cred	Req	Spring	Cred	Req
MGT 1100 Intro to Business	4	M	ACC 2203 Accounting for Business	4	M
ECO 1201 Intro to Economics (SOSC)	4	M	MKT 2205 Principles of Marketing	4	M
FYS 1947 First Year Seminar: Who am I? (FYS)	4	G	MGT 2150 Data Analysis for Business (Q)	4	M, G
FC Core Course (RTS)	4	G	FC Core Course (STEM)	4	G
Total Semester Credits	16		Total Semester Credits	16	
Year Two					
Fall	Cred	Req	Spring	Cred	Req
FIN 2500 Managerial Finance	4	M	Major Elective	4	ME
MGT 3130 Legal Environment Business	4	M	MGT 3120 Organizational Behavior	4	M
MGT 3440 Workplace & Culture (CS)	4	G, M	MGT 3430 Ethics & Social Responsibility (HUM)	4	G, M
FC Core Course (Core Cert. or Minor)	4	G	FC Core Course (Core Cert. or Minor)	4	G
Total Semester Credits	16		Total Semester Credits	16	
Year Three					
Fall	Cred	Req	Spring	Cred	Req
Business Experiential Req. (MGT 4010 or equiv.)	4	M	MGT 4100 Strategic Analysis & Dec. Making (W)	4	G, M
Major Elective	4	ME	Open Elective (or FC Core Cert. or Minor)	4	O
FC Core Course (Core Cert. or Minor)	4	G	Open Elective (or FC Core Cert. or Minor)	4	O
Open Elective (or FC Core Cert. or Minor)	4	O	Open Elective (or FC Core Cert. or Minor)	4	O
Total Semester Credits	16		Total Semester Credits	16	

G = Gen Ed Requirement; M = Major Requirement; ME = Major Elective; O = Open Elective

Note: This is a sample curriculum map. Students may progress toward graduation using alternative pathways.

VII. Appendix B: Assessment Plan

Merrimack will partner with the College-in-3 Exchange to support the assessment and continuous improvement of these applied bachelor's degree programs. Through this collaboration, the College will engage in shared data collection, benchmarking, and evaluation practices aligned with peer institutions implementing similar models. We recognize that many colleges and universities are closely monitoring the development of reduced-credit bachelor's degrees and are seeking clear, evidence-based validation of their effectiveness. Accordingly, the College is committed not only to assessing its own program outcomes, but also to contributing to a broader body of evidence regarding student learning, cost efficiency, and post-graduation success. We strongly believe in the potential of this model to expand access and improve outcomes for students, and we aim to generate rigorous, transparent data that can inform and encourage innovation across the higher education sector.

The College will evaluate the success of the proposed applied bachelor's degrees through a comprehensive set of measures that include direct assessment of student learning, student experience indicators, and program- and institutional-level outcomes. These metrics are intended to assess both academic quality and the effectiveness of the reduced-credit model in improving access, affordability, and student success. Student learning will be evaluated through multiple lenses, including the percentage of students demonstrating proficiency in at least three major-specific learning outcomes, as measured through capstones, projects, or applied evaluations, as well as performance on general education outcomes using institutionally approved rubrics and embedded course assessments. In addition, student achievement will be assessed using AAC&U VALUE rubrics (such as those measuring critical thinking, written communication, and integrative learning) alongside validated measures of student mindset, engagement, and applied skills. Overall program performance will be measured by the percentage of students meeting or exceeding proficiency benchmarks across multiple learning outcomes, based on aggregated direct assessment results.

Student experience will be captured through satisfaction surveys administered at program completion and through longitudinal follow-ups at one- and three-year intervals. Post-graduation success will be evaluated using employment rates, job placement in field or related field, graduate school enrollment, and early career earnings, with the expectation that these outcomes will be comparable to those of traditional 124-credit bachelor's degree programs. Program-level outcomes will also focus on cost efficiency and completion. The total cost at graduation, including tuition and fees, will be compared between three-year and traditional four-year program graduates, with the expectation that costs for the reduced-credit model will be approximately 70–80% of those for comparable 124-credit degrees. Completion rates and time to degree will be assessed at three- and five-year benchmarks and compared with four- and six-year completion rates for traditional programs, with the expectation of comparable outcomes.

The College will implement a comprehensive assessment strategy that integrates both formative and summative approaches to ensure the continuing quality, relevance, and effectiveness of the proposed applied bachelor's degree programs in business, criminal justice, psychology, and

communication. This approach is grounded in clearly defined student, programmatic, and institutional outcomes, with specific metrics designed to evaluate both academic quality and the effectiveness of the reduced-credit model.

Formative assessment will occur on an ongoing basis and will support continuous program improvement. At the course and program levels, faculty will use embedded assessments (such as projects, applied assignments, and experiential learning activities) to evaluate student progress toward major-specific and general education learning objectives. These assessments will be aligned with institutionally approved rubrics and, where appropriate, AAC&U VALUE rubrics to measure competencies such as critical thinking, communication, and integrative learning, as well as broader indicators of student mindset, engagement, and applied skills. Faculty will regularly review data on the percentage of students demonstrating proficiency in program-designated learning outcomes and overall aggregated learning outcomes performance to identify areas for curricular refinement. Additional formative inputs will include student feedback collected through course evaluations and targeted program surveys, as well as ongoing monitoring of retention rates (first-to-second year and second-to-third year) and internal transfer patterns between 96-credit and 124-credit programs. Input from employer advisory boards and participation in the College-in-3 Exchange will further inform program alignment with workforce needs and emerging best practices.

Summative assessment will evaluate overall program effectiveness at key milestones. Direct measures will include capstone projects, portfolios, internships, or other culminating experiences, through which students will be assessed on their ability to demonstrate proficiency in multiple program-level learning outcomes. The College will track the percentage of students meeting or exceeding proficiency benchmarks across these outcomes as a primary indicator of academic quality. Summative evaluation will also include student satisfaction and experience, measured through surveys administered at program completion and longitudinally (e.g., one- and three-year follow-up), as well as post-graduation outcomes such as employment rates, job placement in field or related field, graduate school enrollment, and early career earnings. These outcomes will be benchmarked against those of existing 124-credit bachelor's degree programs, with the expectation that student success metrics will be comparable.

Program-level effectiveness will be further assessed through analysis of cost efficiency and completion outcomes. The College will track total cost at graduation (tuition and fees) and compare average costs between 3-year and traditional 4-year programs, with an expected reduction to approximately 70–80 percent of the cost of comparable 124-credit degrees. Completion rates and time-to-degree will be evaluated at 3-year and 5-year benchmarks and compared to traditional program outcomes at 4-year and 6-year benchmarks, with the expectation that completion rates will be comparable or improved. Retention rates and patterns of internal transfer between reduced-credit and traditional programs will also be analyzed to assess student progression and program fit.

Findings from both formative and summative assessments will be systematically reviewed through annual assessment reports and program review processes. Faculty and administrators

will use these data to make evidence-based adjustments to curriculum, pedagogy, and program structure, ensuring continuous improvement and responsiveness to student and workforce needs.

Through this integrated assessment framework, grounded in clearly defined outcomes, measurable metrics, and both internal and external review, the College will ensure that the proposed applied bachelor's degrees maintain high academic standards, demonstrate strong student outcomes, and fulfill their intended goals of improving access, affordability, and workforce alignment.

Innovation Proposal Completeness Review — Merrimack College

Applied Bachelor of Arts in Psychology
 Applied Bachelor of Arts in Communication
 Applied Bachelor of Arts in Criminal Justice
 Applied Bachelor of Science in Business Administration

Requirement	Status	DHE Reviewer Notes (Initial Review)	Where Addressed	DHE Reviewer Notes (Final Review)
Eligibility Criteria				
Accredited without sanction or public notation for a minimum of six consecutive years by a U.S. Department of Education-recognized accrediting agency	<input checked="" type="checkbox"/>	Met	Section I, p.3	Met
Massachusetts-based institution with physical presence in the Commonwealth for a minimum of six consecutive years	<input checked="" type="checkbox"/>	Met	Section I, p.3	Met
Operated continuously by the same governing entity for a minimum of six consecutive years	<input checked="" type="checkbox"/>	Met	Section I, p.3	Met
Not under any investigation or corrective action by the Commonwealth, federal government, or relevant oversight bodies	<input checked="" type="checkbox"/>	Additional information needed: attestation statement required.	Section I, p.3	Met
Application Requirements (610 CMR 16.05)				
Payment of Required Fees	<input checked="" type="checkbox"/>	Additional information needed: institution has been invoiced for the required \$10,500 fee.	Payment received on May 11, 2026	Met
LOI Requirements (610 CMR 16.06 and 16.07)				
Demonstrate the institution's eligibility under Section 16.04	<input checked="" type="checkbox"/>	Additional information needed: attestation statement required.	Section I, p.3	Met – Addressed in Section I, p.3 Note: Attestation provided.
Identify where the proposed initiative may be inconsistent with Board regulation(s) or policies, and	<input checked="" type="checkbox"/>	Additional information needed: the application identifies where Merrimack's proposal is	Section II, p.3	Met – Addressed in Section II, p.3

confirm consistency with all other applicable regulations		inconsistent with NECHE standards. However, it does not speak to the Board's degree granting regulations.		Note: The LOI identifies where Merrimack's proposal is inconsistent with NECHE standards. The LOI speaks to the Board's degree granting regulations as referenced in the template.
State the purpose and intent of the initiative and the intended innovation it is intended to advance	☒	Met	Section III, pp. 3-4	Met
Provide converging evidence to support there is a problem to be solved through innovation	☒	Met	Section IV, pp. 4-7	Met
Provide evidence to support efficacy of proposed innovation, including analysis of experiences of other institutions offering similar proposals	☒	Additional information needed: The proposal cites three-year degrees offered at Oxford University, Cambridge University, etc as comparable programs. In its approval letter, NECHE stated that "the comparison between Merrimack's 96-credit applied degree programs and 'three-year degree programs offered in Europe, Australia, India or other countries in the world' may be misleading or confusing." Revised information on comparable programs is needed.	Section IV, pp. 4-7	Met – Addressed in Section IV, pp. 4-7 Note: Disclosures have been updated pursuant to changes in NECHE policy.
Confirm and describe how the initiative is consistent with the institution's mission	☒	Met	Section V, pp.19-20	Met
Describe how the initiative fulfills a demonstrated need and/or provides one or more defined benefits to existing or potential students	☒	Met	Section IV, pp. 4-7	Met

<p>Include an analysis of the proposal's alignment with academic and workforce needs</p>	<p style="text-align: center;">☒</p>	<p>Additional information needed.</p> <p>Provided: information on regional and/or statewide labor market, provide evidence to support this claim, including references to workforce development plans (e.g. MassHire Regional Blueprints), showing market need and employer engagement; market research; employer research.</p> <p>Not clearly provided: How were the four majors selected for a 96-credit offering? Note: Indirectly acknowledge some majors not suitable for this format (p. 18 par. 2)</p> <p>What is the student market for the proposed programs? Provide data and information that form the basis for enrollment projections. Did the institution conduct any research with currently enrolled students to assess the demand for 96-credit degrees in the four selected majors?</p>	<p>Section IV, pp. 7-11</p>	<p>Met – addressed in Section IV, pp. 7-11</p>
<p>Demonstrate the financial, human, physical, information, and technological resources required for the pilot and evidence of sufficient resources to begin and sustain the initiative</p>	<p style="text-align: center;">☒</p>	<p>Met - No separate budget; attestations that resources are sufficient.</p>	<p>Section V, pp. 21-22</p>	<p>Met</p>
<p>Identify potential risks to students and present risk mitigation strategies</p>	<p style="text-align: center;">☒</p>	<p>Risks identified:</p> <p>The LOI states that students in the 96-credit programs “will have limited opportunity for electives, study abroad, minors or double majors” (p. 3).</p>	<p>Section IV, pp. 12-19</p>	<p>Met – Addressed in Section IV, pp. 12-19.</p> <p>Note: Merrimack noted that the College had revised its practice regarding transfer</p>

	<p>Clarifications needed:</p> <p>No discussion of articulation with their Honors Program; this had appeared in earlier applications. The current discussion about how transfer credits will be treated in the context of Merrimack's Honors Program disadvantages students in this degree type. While in the existing degree students can reduce the required number of honors courses through transfer and AP credits from eight to six, students in the 96-credit degree cannot reduce that number further by presenting such credits.</p> <p>No discussion of the residency requirement for the sub-120 degree program. Please note that adherence to the same residency requirement between the two degree types would disadvantage students who may transfer in with associate degrees and/or substantial other credit accumulation.</p> <p>Articulation with pre-matriculation experiences and credit accumulation such as dual enrollment, Early College, AP course and credits, etc. need to be addressed. Some large categories of credit and credit-worthy experience are not referenced in this LOI, such as credit for certain military experiences, credit by examination other than AP, prior learning assessment, etc.</p>	<p>honors courses so that there is no limit to the number of honors courses that may be transferred in, and therefore no associated risk for honors students who wish to transfer into an applied bachelor's degree, so this has been removed from the LOI.</p>
--	--	---

<p>Address degree or certificate nomenclature, ensuring clarity and avoiding confusion with other programs</p>	<input checked="" type="checkbox"/>	<p>Met - Will use the nomenclature Applied Bachelor of Arts and Applied Bachelor of Science.</p>	<p>Section V, p. 23</p>	<p>Met</p>
<p>Provide proposed marketing materials with clear and conspicuous disclosures, including pilot nature and cost</p>	<input checked="" type="checkbox"/>	<p>Additional information needed: NECHE had required Merrimack to update its disclaimer language:</p> <p>“Because the comparison between Merrimack’s 96-credit applied degree programs and “three-year degree programs offered in Europe, Australia, India or other countries in the world” may be misleading or confusing, we request that the College change its disclaimer language to remove this comparison. We ask that once this disclaimer language is updated, the College submit the revised disclaimer language to Commission staff through the NECHE Portal.”</p> <p>Disclosure statement provided on p. 25:</p> <p>“While three-year bachelor’s degrees are common in many parts of the world, including Europe, Australia and India, the 96-credit applied bachelor’s degree is an innovation in the United States. As such, some graduate programs, professional schools, and employers might not accept a baccalaureate degree of fewer than 120 credits. Students who discover that their career goals are not satisfied by</p>	<p>Section V, pp. 24-26</p>	<p>Met – Addressed in Section V, pp. 24-26</p>

		<p>their applied bachelor's degree may return within five years of completing their applied bachelor's degree and be readmitted automatically in order to satisfy the requirements for the 124-credit version of their applied bachelor's degree. Upon successful completion of the requirements for the 124-credit degree they will have their degree converted from an applied degree to a bachelor's degree. Any students who do so will be charged the tuition and receive the scholarship that they received in their final year of seeking the applied bachelor's degree.”</p>		
<p>Describe how the institution intends to secure informed consent of students participating in the pilot program</p>	<input checked="" type="checkbox"/>	<p>Additional information needed. Not discussed in the proposal; see pp. 14 et seq.</p>	<p>Section V, pp. 24-25</p>	<p>Met – Addressed in Section V., pp. 24-25.</p> <p>Note: Merrimack provided updated disclosure statements to be included in its marketing materials and described that students would be required to attest to their participation in a pilot program.</p>
<p>Identify intended student and/or program outcomes, and what measures and metrics will evaluate the progress and success of the initiative (must include persistence, graduation rates, total cost, employment and earnings outcomes)</p>	<input checked="" type="checkbox"/>	<p>Additional information needed: While the application talks about retaining one or more consultants to help with design and evaluation, and about collecting data to assess outcomes such as persistence, graduation rates, and obtaining employment, there is no discussion of benchmarking or of</p>	<p>Section IV, pp. 11-12; Section VI Appendix A, pp. 28-44; Section VII Appendix B, pp. 45-47</p>	<p>Met – Addressed in Section IV, pp. 11-12; Section VI Appendix A, pp. 28-44; Section VII Appendix B, pp. 45-47</p> <p>Note: Merrimack provided a larger discussion on assessment and evaluation.</p>

		comparing the outcomes for students in standard 124-credit (or more) degrees versus the 96-credit degree being proposed.		
Include a description of formative and summative assessment plans to ensure continuing quality, relevance, and effectiveness; including required reporting to accreditors, licensure bodies, or other authorities	☒	Additional information needed: The institution needs to describe how it will identify and remediate instances in which students or programs do not meet the stated outcomes.	Section IV, pp. 24-27; Section VII. Appendix B, pp. 45-47	Met – Addressed in Section IV, pp. 24-27; Section VII. Appendix B, pp. 45-47 Note: Merrimack provided a larger discussion on assessment and evaluation.
Include any other pertinent information deemed relevant by the institution or requested by the Department	N/A	No additional information was requested by DHE Staff.		N/A
The institution demonstrates it will exercise sufficient administrative and fiduciary control over the initiative, including academic programming (16.06(2)(c))	☒	Met	Section V, pp. 20-21	Met
The proposal speaks to the integrity of the proposed initiative or degree program(s) — admissions and degree requirements, defined amount and quality of work, graduates well prepared for continued study or performance in related occupations (16.06(2)(f))	☒	Additional information needed: general education requirements and internships (see information below)	Section V, pp. 23-24; Section VI Appendix A, pp. 28-44; Section VII,	Met - Met – Addressed in Section V, pp. 23-24; Section VI Appendix A, pp. 28-44; Section VII, Appendix B, pp. 45-47 Note: Merrimack confirmed that General Education requirements have been updated.
Additional LOI Requirements				
Proposals should describe how the institution will ensure equitable access for all students to educational experiences within	☒	Additional information needed: See notes on potential student risks.		

the context of the innovation initiative				
If proposing an undergraduate degree program, describe the general education requirement, including its goals and outcomes	☒	Additional information needed: The application states that Merrimack will be revising its general education program. What is the status of this work? If still in process, will it impact the implementation of this program?	Section V, pp. 23-24; Section VI Appendix A, pp. 28-44; Section VII, Appendix B, pp. 45-47	Met – Addressed in Section V, pp. 23-24; Section VI Appendix A, pp. 28-44; Section VII, Appendix B, pp. 45-47 Note: Merrimack confirmed that General Education requirements have been updated.
If a degree program, include procedures and arrangements for independent work, paid or unpaid internships, or clinical placements, if applicable	☒	Additional information needed: Two of the four programs require internships; it appears internships are options in the others. No information is included about how these internships will be arranged, if they are paid or unpaid, or how the internship will be assessed.	Section V, pp. 23-24; Section VI Appendix A, pp. 28-44;	Met – Addressed in Section V, pp. 23-24; Section VI Appendix A, pp. 28-44;
Additional Elements Required of Independent IHEs				
Pursuant to 610 CMR 16.06(2)(a)(b) and 16.07, independent institutions must demonstrate the proposal satisfies Board standards, regulations, and implementation policies (M.G.L. c. 69, §30 et seq.; 610 CMR 2.0 et seq.)	☒	Additional information needed: Faculty Form needed for all instructional staff who will develop or maintain curriculum/assessments and who will teach in the proposed program.	Full Faculty Form submitted separately	Met Note: Merrimack noted the total full-time faculty supporting each program Communication Degree: 6 full-time faculty Business Administration: 17 full-time faculty Psychology: 8 full-time faculty

				Criminal Justice: 8 full-time faculty
--	--	--	--	--

Name/Affiliation	Comments	Response
Joseph Swab, Associate Professor of Psychology, Bridgewater State University	Generally opposed to offering "two-tier system" to lower-income students; strongly opposed to reduced 96 credit psychology degree as it may not transfer to graduate school or properly prepare students for employment	Pursuant to Sections 16.06(g) and 16.07(11), students will be informed during the admissions process of any potential risks and required to acknowledge their participation in a pilot program offered under the Massachusetts Board of Higher Education's Degree Regulations for Pilot Proposals on Innovation. For many students—particularly working adults and those balancing family responsibilities—time to degree and cost remain significant barriers to completion. Thoughtfully designed reduced-credit pathways can expand access to high-quality degrees while maintaining rigorous academic standards.
Robert Amey, Associate Professor of Geography, Bridgewater State University	Generally opposed to offering "second rate degree", if cost is an issue, suggests State fund higher ed more	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.

<p>James Pearson, Professor and Chair of the Philosophy Department, Bridgewater State</p>	<p>Urges Board to reject all reduced-credit degree programs because it will create 1) two-tier system ultimately making reduced credit program worthless and "undermine public's understanding of higher education in our state," will disenfranchise students, prevent them from being well-rounded, active citizens, and prevent them from having the skills necessary to navigate volatile job market, 2) 120 degree programs have been the gold standard for over a century giving students "the time to mature as critical thinkers, breadth to understand their talents and interests, and depth to master their chosen field and productively enter the workforce." 3) will not achieve the goal of improving access to higher education.</p>	<p>The general opposition expressed in the comment is acknowledged. The Board remains committed to equity and to its responsibility to ensure access to high-quality postsecondary opportunities for all students. In evaluating the proposed pilot, the Board will apply these guiding principles alongside its commitment to consumer protection in making approval determinations. Learning outcomes for reduced-credit programs are held to the same standards as those for traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do.</p>
<p>Kevin Young, Associate Professor of History, UMass Amherst</p>	<p>Generally opposed; feels it will degrade quality of higher education or reduce liberal arts place in curriculum; suggests more public funding for higher ed instead</p>	<p>The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.</p>

<p>Jeanne Hardy Professor of Chemistry, UMass Amherst</p>	<p>Has significant concerns and urges the Board to reject Suffolk & Merrimack's proposed reduced degree programs-students need time to develop critical thinking skills, writing, reading of complex material, and opportunity to wrestle with disparate ideas, important in science but also to be competitive with industry jobs or admission to graduate school or other professional schools. Should not be a race to the bottom but continue to uphold high standards for higher ed in the state.</p>	<p>The general opposition expressed in the comment is noted. It should also be emphasized that, as part of its review, the Board and the Department expect pilot proposals to give careful consideration to labor market demands and, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. Additionally, all pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do.</p>
<p>Bruce Baird, Professor, Japanese Program, UMass Amherst</p>	<p>Generally opposed to narrowing scope of education in the age of AI; need to be exposed to wide-range of ideas in art, literature, social sciences, and sciences to provide irreplaceable human element.</p>	<p>The general opposition expressed in the comment is noted.</p>

<p>Timothy Eddy, Chair and Professor of Psychology, Salem State University</p>	<p>Generally opposed-will weaken meaning of bachelor programs in MA; will create two-tier system for financially strained students, reduced credit programs close the door to grad school/other professional programs, licensure pathways, employment, narrow focus make it harder to adapt to economy being shaped by AI</p>	<p>We agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating these pilots we do not intend to lower standards or create a two-tiered system of higher education, but seek to modernizing pathways to ensure they remain rigorous, relevant, and responsive to the needs of today's students and the economy. It should also be emphasized that, as part of its review, the Board and the Department expect pilot proposals to give careful consideration to labor market demands and, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. Additionally, all pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do.</p>
<p>Daniel Welsh, Professor of Biology, Fitchburg State University</p>	<p>Generally opposed-extreme dismay, urge board not to permit- will weaken value of bachelor's degree, will make it more confusing/harder for students to make informed decision, reduced credits equal lower value-reduced liberal arts courses and restricted electives makes students less well-rounded which employers say they are looking for, graduates of these programs will be less competitive in the workforce, Commonwealth needs strong, educated workforce to face future challenges</p>	<p>The general opposition expressed in the comment is noted. It should further be noted that these programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The difference lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do.</p>

Mark Roblee, Senior Lecturer,
Commonwealth Honors College, UMass
Amherst

Generally opposed-would weaken credentials under guise of affordability- instead restore state funding. Reduced credits closes the doors to grad and professional schools, licensure, long-term advancement, greatest risks to the most vulnerable, and NECHE emphasized students may not be eligible for future federal aid if change mind to pursue traditional bachelor program, will create a two-tier system that will widen inequality in MA. Liberal arts education matter in age of AI also prepares students for employment, civic participation, and lifetime of needing to adapt professionally. MA should lower financial barriers, not standards.

The comment regarding funding is outside the scope of this proposal; the broader opposition is acknowledged. Further note that programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. As for concerns about aid eligibility and risks, per Section 16.06(g) and Section 16.07(11), as part of the admissions process, students will be made aware of potential risks and will be required to acknowledge that they are participating in a pilot program offered under Massachusetts Board of Higher Education's Degree Regulations for Pilot Proposals on Innovation.

Ivana George, Professor of Art, Bridgewater State University

Generally opposed-instead, restore state funding don't lower standards with "less education and call it access. That is not innovation. It is education shrinkflation." Reduced credit degree may close the door to employment, long-term advancement, grad and professional schools, and licensure. NECHE warned of this. Risks are to the most vulnerable. Liberal Arts education matters in age of AI.

The comment regarding state funding is outside the scope of this proposal; the broader opposition is acknowledged. Note that pilot programs reviewed by the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. As for concerns about aid eligibility and risks, per Section 16.06(g) and Section 16.07(11), as part of the admissions process, students will be made aware of potential risks and will be required to acknowledge that they are participating in a pilot program offered under Massachusetts Board of Higher Education's Degree Regulations for Pilot Proposals on Innovation.

Siobhan Mei, Lecturer, Manning College of Information and Computer Science, UMass Amherst

Has serious concerns-will undermine value and significance of the bachelor's degree and erode the public's trust in higher ed, will create a two-tier system for those most under financial pressure to take lesser credential, close the door to graduate and professional schools, employment, licensure pathways, and in economy being shaped by AI, will narrow focus when students need broad liberal arts education the most to adapt to lifetime of changes. Defend higher education systems in MA-do not pass.

We agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating these pilots we do not intend to lower standards or create a two-tiered system of higher education, but seek to modernize pathways to ensure they remain rigorous, relevant, and responsive to the needs of today's students and the economy. It should also be emphasized that, as part of its review, the Board and the Department expect pilot proposals to give careful consideration to labor market demands and, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. Additionally, all pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do.

<p>Kim MacInnis, Chair and Professor of Sociology, Bridgewater State</p>	<p>Generally opposes-will weaken bachelor credential, will close doors to future opportunities for grad/professional school, employment, future advancement, greatest risks falls on the most vulnerable, students that may need additional credits may have to pay out of pocket/take out loans. Will create a two-tier education system, "In an economy being shaped by AI, the purpose of a baccalaureate degree cannot be reduced to short-term job training. Students will not simply enter one profession and remain there unchanged...need breadth of education that baccalaureate provides. MA should lower financial barriers not expectations."</p>	<p>Please see response to Comment #2, Comment #4, and Comment #11.</p>
<p>Jamie Huff, Professor of Criminal Justice, Bridgewater State</p>	<p>Specifically writing in opposition to reduced credit Criminal Justice program at Merrimack-will water down the credential and make students less prepared, less knowledgeable, and less able to have good judgement in complex situations, also concerned students will not understand this could limit their ability to attend graduate or law school without having to go back after graduating to obtain the required level of credits.</p>	<p>The 96-credit Criminal Justice degree consolidates the content of the 124-credit curriculum and focuses on criminal justice, juvenile justice, and court systems-- how they operate, and how to prepare for various occupations and professions within those systems. This proposed pilot degree is less theoretical than the 124-credit degree program and concentrates on the applied, practical aspects of the Criminology and Criminal Justice 124-credit degree. Please see response to Comment #2 regarding ability to attend graduate school/ law school</p>

<p>Melissa LaBelle, Visiting Assistant Professor of Secondary Education & Educational Leadership, Bridgewater State University</p>	<p>Speaking on behalf of BSU faculty members, reduced credit degrees will strip students of necessary skills and knowledge needed to attend graduate schools, secure jobs and promotions, will widen gap between families of means and those without.</p>	<p>The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways.</p>
<p>Diana Fox, Professor & Chair, Anthropology Department, Bridgewater State University</p>	<p>Generally opposed-will make students less prepared and competitive in the job market, stripping them of necessary skills and knowledge to perform across majors, contribute to widening inequality.</p>	<p>The Board remains committed to equity and its responsibility to ensure access to high-quality postsecondary opportunities for all students. It further recognizes that, for many students—particularly working adults and those balancing family responsibilities—time to degree remains a significant barrier to completing college. In evaluating the proposed pilots, the Board will apply these guiding principles alongside its commitment to consumer protection when making approval determinations. Additionally, learning outcomes for reduced-credit programs will be held to the same expectations as those for traditional baccalaureate degrees. The distinction</p>

<p>Lilian Bobea, Associate Professor of Criminal Justice, Fitchburg State University</p>	<p>Specifically opposed to reduced credit criminal justice program at Merrimack. Criminal justice field becoming more complex-less opportunity to grasp emerging trends and tangible skills, less opportunity for networking, internships, create sense of belonging, will be more difficult for students to secure jobs and promotions</p>	<p>Please see response to Comment #14. Further, Merrimack states that the proposed pilot degree program will produce students who are career-ready for jobs in law enforcement, the court systems, human service agencies, jails and prisons.</p>
<p>Seth Meyer, Canton, MA</p>	<p>Generally opposed-will create two-tier system and make students less competitive in job market with a lack of a well-rounded education</p>	<p>All pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degree and where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across multiple post-completion options.</p>

<p>Cielito "Tammy King", Professor of Chemical Science, Bridgewater State University</p>	<p>Generally opposed. As member of science faculty, concerned reduced credit programs will weaken the credential and provide less hands on opportunities for students to conduct research and in labs. Generally will make students less prepared for grad school and less competitive for job opportunities.</p>	<p>The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive</p>
<p>Melissa, Winchell, Associate Professor, Secondary Education & Educational Leadership, Bridgewater State University</p>	<p>Generally opposed-would weaken bachelor's degree in MA, would create a two-tier education system</p>	<p>We agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating these pilots we do not intend to lower standards or create a two-tiered system of higher education, but seek to modernize pathways to ensure they remain rigorous, relevant, and responsive to the needs of today's students and the economy. It should also be emphasized that, as part of its review, the Board and the Department expect pilot proposals to give careful consideration to labor market demands and, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. Additionally, all pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate</p>

<p>Helen Poynton, Professor of Ecotoxicology, UMass Boston</p>	<p>Reduced credit bachelor's degree is not the solution to affordability-students need well-rounded education to think creatively and bring novel solutions especially in the face of eroding democracy, must remain committed to liberal arts education</p>	<p>The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive</p>
<p>Amy Wehe</p>	<p>Not opposed to 90 credit degree in theory but is opposed to it being labeled a "bachelor's degree." Believes it is misleading and does not provide all the benefits a full 120 credit baccalaureate degree provides including ability to communicate with people in other fields, writing and speaking skills useful in the workforce and may not qualify for entry into graduate school</p>	<p>Per Section 16:06 (2e), the proposal speaks to nomenclature and is consistent with NECHE naming and distinction guidance.</p>
<p>Seán Creighton, President, NACU</p>	<p>Strong support for Merrimack's 3 year degree programs. Commends Merrimack's record of student success as being the right institution to pilot these programs. Lists positive benefits for shortened programs including increasing access, reducing costs for students and getting them into the workforce sooner</p>	<p>The comment is noted.</p>

<p>Daniel Price, Professor of Criminal Justice, Westfield State University</p>	<p>Generally opposes-will weaken bachelor credential, will close doors to future opportunities for grad/professional school, employment, future advancement, greatest risks falls on the most vulnerable, students that may need additional credits may have to pay out of pocket/take out loans. Will create a two-tier education system, "In an economy being shaped by AI, the purpose of a baccalaureate degree cannot be reduced to short-term job training. Students will not simply enter one profession and remain there unchanged...need breadth of education that baccalaureate provides. MA should lower financial barriers not expectations."</p>	<p>The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive</p>
<p>Justin L. Golub, Biology Department Chair, MCLA</p>	<p>Strongly oppose as someone with 20 years higher ed experience-reduced credit programs strip away essential skills students need to be successful in their careers and to be thinkers and innovators. Makes students less competitive than their peers and erodes public's trust in college education which is already at an all-time low.</p>	<p>We agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating these pilots we do not intend to lower standards or create a two-tiered system of higher education, but seek to modernize pathways to ensure they remain rigorous, relevant, and responsive to the needs of today's students and the economy. It should also be emphasized that, as part of its review, the Board and the Department expect pilot proposals to give careful consideration to labor market demands and, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. Additionally, all pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate</p>

<p>Adam Brieske-Ulenski, Associate Professor of Literacy Education, Bridgewater State University</p>	<p>Strongly opposes as a faculty member, department chair, and educator-speaks about the value of a liberal arts education in providing breadth of knowledge for career advancement, graduate study, lifelong learning, and civic participation. The reduction in credits risks creating a two-tier system that may ultimately lead to less opportunities down the line. Instead invest in students, financial aid, transfer pathways, reduce barriers to access. Specifically mentioned reduced credit criminal justice program may not prepare students for grad programs outside of Merrimack. "Would weaken public confidence in higher education, diminish student opportunities, and create confusion among employers, graduate programs, licensing agencies, and students themselves."</p>	<p>The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. See</p>
<p>Erika Schneider, Framingham, MA</p>	<p>Generally opposes the reduced credit bachelor programs as they will close doors to employment, graduate/professional school, licensure, long-term advancement and puts the risk on the most vulnerable, creating a two-tier education system. Liberal arts education matter in age of AI not just for employment but for civic engagement and professional adaptation. MA should lower barriers, not standards. Specifically mentions Merrimack reducing general ed core requirements for standard bachelor program prior to creating reduced credit programs so to "say with a straight face, that the 96 credit degree involves no reduction to the core..."</p>	<p>Please see response to Comment #4. Further, the general education core reduction was identified by DHE Staff and addressed in the revised application submission (p. 23).</p>

<p>Alexander Hartwiger, Brighton, MA</p>	<p>Generally opposes Merrimack's proposals-does not meet NECHE's standard in practice for adequate breadth of arts and humanities in gen ed requirements. With AI reshaping the workforce, now not the time to make students less adaptable; will also make students less prepared for civic engagement and will weaken democracy; "I understand that private institutions need to remain competitive but if this body green lights the gutting of the standards for a degree then we continuing a cycle of exploitative higher education practices."</p>	<p>The general opposition expressed in the comment is noted. Further, the proposed pilot program was approved by Merrimack's external accreditor (NECHE) pending BHE approval through NECHE's innovation pathway.</p>
<p>Rachel Trousdale, Professor of English, Framingham State University</p>	<p>As a current professor of English at FSU and having worked in both public and private institutions, see disparities of resources available for low income students; opposed to reducing standards and streamlining degrees for students to speed through for the sake of affordability, this would formalize two-tier system that already exists for lower income students. Instead, should make state investments to lower costs and add more student support; "those investments will mean that low-income students can access the full benefit of a four-year degree, not settle for the cut-rate knockoff."</p>	<p>Please see response to Comment #4 and Comment #2 regarding financial barriers. Further, the Board remains committed to equity and its responsibility to ensure access to high-quality postsecondary opportunities for all students. It further recognizes that, for many students—particularly working adults and those balancing family responsibilities—time to degree remains a significant barrier to completing college. In evaluating the proposed pilots, the Board will apply these guiding principles alongside its commitment to consumer protection when making approval determinations. Additionally, learning outcomes for reduced-credit programs will be held to the same expectations as those for traditional baccalaureate</p>

Cynthia Prehar, Framingham, MA	Generally opposed-will make students less competitive in age of AI, may require additional coursework out of pocket to attend grad or other professional schools and may not be qualified for certain licensures, employers want more skills like adaptability, leading diverse teams, effective communication skills and will have less opportunities to develop these skills, also 4th year opportunities such as as: capstone projects, thesis, internships, research, double majors may be lost, risks creating two-tier system. Protect value and integrity of the baccalaureate degree in MA.	We agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating these pilots we do not intend to lower standards or create a two-tiered system of higher education, but seek to modernize pathways to ensure they remain rigorous, relevant, and responsive to the needs of today's students and the economy. It should also be emphasized that, as part of its review, the Board and the Department expect pilot proposals to give careful consideration to labor market demands and, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. Additionally, all pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate
John Dempsey, Westfield State University	96 credit degree is a "disgraceful attempt to destroy the fundamental purpose of a University education." Universities are not Vocational High Schools. "Would be more honest to simply hand out degrees upon payment of four years tuition than to institute a 96 credit degree."	The general opposition expressed in the comment is noted.

Stefan Papaioannou, Westborough, MA	<p>Strongly opposed to Merrimack's 96 credit proposals: watered down degree eliminates core requirements that will leave students ill-prepared for changing workforce and to be a citizen of the commonwealth/nation, makes the credential incomparable with true bachelor's degrees. "The Commonwealth needs to commit to providing students with the financial support they need in order to access the higher education that they deserve."</p>	<p>The general opposition expressed in the comment is noted. See Comment #2 and Comment #29.</p>
Catherine Benincasa, West Hatfield, MA	<p>Expressing strong condemnation of Merrimack's and Suffolk's proposals- should not dilute liberal arts education to save money; suggests reducing number of administrators to cut costs instead; equates reduced credit programs to fast food, costs less money, but also getting reduced quality; would be a slippery slope to diminish the achievement of earning a bachelor's degree; should not lower the bar</p>	<p>The general opposition expressed in the comment is noted. Also see Comment #25.</p>

<p>Jane Sancinito, Associate Professor of History, University of Massachusetts-Lowell</p>	<p>Generally opposed-the proposed reduced degree programs "diminish the value, transferability, and long-term utility of a bachelor's degree while creating barriers for the students they are trying to help." Eliminates gen ed requirements by embedding in the major courses; students are not receiving foundational knowledge in writing, critical thinking, reading, and social skills found in other disciplines; "traditional 120 credit degrees should not just be for the wealthy few"</p>	<p>The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive</p>
<p>Patricia Horvath, Professor of English, Framingham State University</p>	<p>Expressing opposition to reduced credit programs; as an FSU professor who teaches students who are primarily working class and first gen- they would be most hurt by these reduced credit bachelor programs as most under financial pressure to take a weaker degree further widening the educational and class disparities that already exist; attacks liberal arts when critical thinking skills are most important in age of AI</p>	<p>The Board remains committed to equity and its responsibility to ensure access to high-quality postsecondary opportunities for all students. It further recognizes that, for many students—particularly working adults and those balancing family responsibilities—time to degree remains a significant barrier to completing college. In evaluating the proposed pilots, the Board will apply these guiding principles alongside its commitment to consumer protection when making approval determinations. Additionally, learning outcomes for reduced-credit programs will be held to the same expectations as those for traditional baccalaureate degrees. The distinction</p>

<p>Ira Silver, Professor, Framingham State University</p>	<p>Will be in 25th year of teaching at FSU this fall and strongly opposed to weakening the quality of education and reducing the courses most needed to develop critical thinking skills to adapt to uncertain times and will be less prepared to face challenges in life and work. "Given that faculty are keenly aware of what our students need to succeed in life, please listen to the strong negative feedback we are raising to the proposed change"</p>	<p>The general opposition expressed in the comment is noted. See Comment #33.</p>
<p>Lynn Shelley, Professor and Chair, Westfield State University</p>	<p>Generally opposed-know first-hand as a college professor, HS students are arriving with more college credit but unprepared to think critically and are less prepared with foundational knowledge than ever; will devalue the meaning of a college education to employers, professional/grad schools, and licensure programs. "This is not access, and it is not equity; it is dilution!"</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Aruna Krishnamurthy, Professor of English, Fitchburg State University</p>	<p>Generally opposes-argues employers value broad skills fostered by a liberal arts education such as communication, critical thinking, teamwork, and leadership and the reduced general education requirements weaken opportunities for interdisciplinary learning and development of these competencies through continued engagement across disciplines. Concludes that "bundling the outcomes of the 30 missing credits and scattering them across a few courses will not create the educated, informed employee that employers value."</p>	<p>The general opposition expressed in the comment is noted.</p>

<p>Patrick Young, Associate Professor of History, UMass Boston</p>	<p>Expressing strong opposition speaking as a tenured professor for past 20 years- will contribute to the "ongoing devaluation of undergraduate liberal arts education and badly serve students' needs in both the near and longer term." Speaks of students' deficiencies in reading comprehension, critical reasoning, and writing skills due to COVID, AI, more screen usage, that is being addressed in college, but the efforts will be undermined with reduced general education credits and leave students less prepared to face uncertain job market, would be a valueless degree to employers, towards graduate education and provide less flexibility for students to transfer between institutions and degrees, "Whether it's the 90-degree or AI, the shortcuts come with a real price, that only become apparent later."</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Sandra Sanchez, Assistant Professor of Biology, Framingham State University</p>	<p>Expresses strong opposition-HS students are entering college with gaps in writing, math, and reading skills; need more support, not less. Reduced gen ed coursework will mean students will have less chance to develop critical thinking skills and engage with various viewpoints; breadth across disciplines have been weakened or eliminated with recent restructuring of gen ed requirements. "Our responsibility is to prepare them for a complex world and that requires a strong, well-rounded academic experience."</p>	<p>The general opposition expressed in the comment is noted.</p>

<p>Mignon Duffy, Professor Sociology, UMass Lowell</p>	<p>Expressing deep concern for these proposals as they will water down education for most vulnerable students; this will reduce their exposure to critical thinking at a time when this skillset will determine who will be replaced by AI and who won't. "We are saying we don't believe our students who face financial and time pressure deserve the same level of education that their peers get." Urges for more public investment in our public education systems to increase accessibility.</p>	<p>The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.</p>
<p>Eileen Kirk, Assistant Professor of Criminal Justice, Fitchburg State University</p>	<p>Specifically concerned with Merrimack's Applied BA in Criminal Justice program specifically because 1) Does not allow students to easily change their major as is common for undergrads; if a student changes from the applied degree to a standard degree, any cost savings would be lost; 2) Program does not include a course specifically on law enforcement or corrections when this program is geared towards students interested in those career fields; 3) combining research methods and statistics into one course would provide insufficient training in both. Commend free community college as innovation but instead of shortening programs, "we should make education more available, accessible, and flexible."</p>	<p>Please see response to Comment #2. Further, major changes in any program often results in additional time to degree depending on the courses previously taken. The curriculum is delivered in a refined, concentrated format through academically rigorous courses; two Criminal Justice electives are available to potentially address law enforcement or corrections (ex: CRM 2600: Women in Law Enforcement). Statistical and methodological skills are covered in two courses: CRM 4000 and CRM 4500.</p>

<p>Amy Springer, Amherst, MA</p>	<p>Expressing opposition to both proposals from Merrimack and Suffolk- understand great need to make higher education more affordable but should provide more student support and not reduce learning opportunities especially as ever-changing work environments and use of AI means students need broad capabilities and not narrow specializations, "cognitive flexibility, creativity, and versatility...employers increasingly value and AI cannot readily supply." Does not think applied degree should have bachelor's listed as part of the degree, should be distinctly labeled.</p>	<p>The general opposition expressed in the comment is noted. Further, per Section 16:06 (2e), the proposal speaks to nomenclature and is consistent with NECHE naming and distinction guidance.</p>
<p>Evelyn Perry, Professor, English Department, Framingham State</p>	<p>Opposes both Merrimack and Suffolk proposals as an attack on liberal arts education that would gut well-rounded degree that equips students for civic and professional life. Will widen opportunity gap in the State as most financially vulnerable will opt for weaker degree. May not lead to reduced tuition as institutions still have to cover fixed costs.</p>	<p>Please see response to Comment #34.</p>

<p>Thomasena Shaw, Department Chair and Professor of Public Relations, Framingham State</p>	<p>Expressing concern as an educator with 30 years' experience regarding Merrimack College's proposed 96-credit Communication degree that it does not provide sufficient evidence that students will receive an education equivalent to a traditional bachelor's program because of reduced theory requirements, the elimination of advanced coursework, and weaker disciplinary knowledge. Contends that the proposal relies more on affordability and employer demand than demonstrated academic outcomes, and that the "proposal relies heavily on employer feedback and Merrimack College advisory board members' opinions as evidence supporting the reduced credit model." Students may have fewer academic and professional opportunities and this places the burden of uncertainty on students.</p>	<p>Please see response to Comment #2. Further, the pilot program design in Communication allows the student to focus on "applied" or praxis-oriented courses as well as the option to further tailor the major to their specific communication interests while still giving them a foundational understanding in the field of communication. The pilot proposal indicates internal assessment by Merrimack and per Section 16.09, for at least the first five years of operation of the initiative, the Board will require the institution to submit annual status reports, which will include assessment of progress in meeting program and student outcomes, including learning outcomes.</p>
<p>Nancy Herman-Centers, Day Lecturer, English Dept, Bridgewater State University</p>	<p>"I work with freshman students almost exclusively, many who are first- or second-generation college students and children of immigrants, commuters, who come from low income households. Many are multilingual learners as well. ALL are highly motivated, but financial barriers already exist. This will only create MORE barriers and force good students to rethink higher education, and graduate school opportunities, not wanting to be saddled with more loans and debt."</p>	<p>Please see response to Comment #34.</p>
<p>Christine Tartaro, Distinguished Professor of Criminal Justice and Chair, Stockton University</p>	<p>Regarding reduced credit Criminal Justice program at Merrimack, thinks it's "a terrible idea", cites several studies that *may* link police with full BS/BA degrees as less likely than less educated officers to use force</p>	<p>The general opposition expressed in the comment is noted.</p>

<p>Diana Fox, Professor and Chair, Anthropology Department, Bridgewater State University</p>	<p>Strongly opposes reduced credit programs at Merrimack and Suffolk-deprives students of deeper learning to build mastery, may not prepare them for advanced research and writing making students less prepared for graduate school and less competitive in the job market</p>	<p>Please see response to Comment #34.</p>
<p>Marta B. Calás, Professor of Organization Studies and International Management, UMass Amherst</p>	<p>Deeply concerned with Merrimack’s applied BS in Business Administration degree-lacks everything undergraduate students need to succeed in current environment and be educated citizen in the world; not innovative to reduce scope of learning and reduce the bachelor degree to technical and vocational skills and not providing opportunities to expand students’ worldviews, specifically calls out that not a single course in international subjects. “a question should first be asked, how would it be possible to make conventional bachelors degrees affordable for everyone? Anything short of that question is just a proposition for reproducing second-class citizenship and maintaining social inequality.” Criticizes Merrimack’s Applied Bachelors in Business Administration for limiting itself to “old disciplinary content” and lacking experiential learning pathways that have been relevant in the field “since the early 1970s...” Calas also criticizes the proposal for not having “a single course oriented towards international activities, such as International Management, something inconceivable in the contemporary world...”</p>	<p>The general opposition expressed in the comment is noted. Further, MKT 2205 is part of the proposed curriculum, and the course presents numerous marketing principles and functions "within a global context."</p>

<p>Joya Misra, Distinguished Professor, Department of Sociology & Public Policy, UMass Amherst</p>	<p>As a professor and someone who studies higher education, has sincere concerns for these proposals; 3-year degrees focused on career outcomes would be better suited as two year degrees as they do not provide the flexibility, critical thinking, and creativity needed to adapt to a changing world and to be global citizens and the importance of strong higher education systems to uphold our democracy. Those with the fewest resources will choose the 3 year degrees creating a two-tier system both for education and work, further deepening inequality and will weaken the power of college degrees and the workforce.</p>	<p>Please see response to Comment #34.</p>
<p>Janna Kellinger, UMass Boston</p>	<p>Commend the board for thinking about affordability in higher ed-but these proposals are not the answer. Reduced credit programs makes students less competitive for jobs and graduate school; reduces 4th year opportunities such as: internships, research, senior theses, minor/majoring in other subjects; "if tuition costs are the issue-lower tuition, if time to complete is the issue, add more summer options; should not endanger our standing as a leader in higher ed while harming our students in the process."</p>	<p>All pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degree and where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across multiple post-completion options.</p>

<p>Lena Ficco, Associate Professor Psychological Science, Fitchburg State University</p>	<p>Truncated degrees should only be considered in consultation with licensing and graduate school program accreditation boards to ensure suitability/transferability especially in fields that likely require advanced education such as psychology; at the very least provide frequent communication/advising for students to make informed decisions so students do not graduate with a useless degree.</p>	<p>Please see response to Comment #2. All pilot programs submitted to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees and, where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across multiple post-completion pathways. Lastly, in accordance with Section 16.06(g) and Section 16.07(11), and as part of the admissions process, students will be informed of potential risks and required to acknowledge that they are participating in a pilot program authorized under the Massachusetts Board of</p>
<p>Kate Ashworth, Attetboro Admissions Counselor, Bristol Community College</p>	<p>Generally opposed-the 90-credit bachelor's degree programs-seem to prioritize institutional enrollment and financial goals over student success, potentially limiting graduates' access to transferring to other institutions or to other majors, limits graduate education, and long-term career mobility. By reducing academic breadth and steering students into narrowly focused pathways, these programs may create greater barriers and potentially add more financial costs down the line.</p>	<p>Please see response to Comment #2. All pilot programs submitted to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees and, where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across multiple post-completion pathways. Lastly, in accordance with Section 16.06(g) and Section 16.07(11), and as part of the admissions process, students will be informed of potential risks and required to acknowledge that they are participating in a pilot program authorized under the Massachusetts Board of Higher Education's Degree Regulations for Pilot Proposals on Innovation.</p>

<p>Jacquie Kurland, Associate Professor, UMass Amherst, Co-President, MA Society of Professors</p>	<p>Urges the Board to reject both pilot proposals or at minimum, delay deliberating until a thorough review of any shortcomings is conducted. Calls out Merrimack proposal specifically for 1)limiting pathways for graduate education to its own programs, 2) “academically thin” requirements with the elimination of some theory courses or choosing certain courses because they double as both major and general ed requirements, 3) assessment of programs against own standards with no external oversight, 4) proposal “provides no validated research demonstrating effectiveness of their pilot programs.” Ultimately will lead to a two-tiered education system causing harm to students who can least afford it.</p>	<p>The four proposed degree programs are designed to equip students with practical, workforce-ready skills while maintaining clear learning outcomes and academic quality. Further, the pilot proposal indicates internal assessment by Merrimack and per Section 16.09, for at least the first five years of operation of the initiative, the Board will require the institution to submit annual status reports, which will include assessment of progress in meeting program and student outcomes, including learning outcomes. In additional, please see response to Comment #59 and Comment #56.</p>
<p>Lisa Bergson, Associate Professor, Public Relations, Bridgewater State University</p>	<p>Expressing deep concern and strong opposition to the reduced credit proposals as a voter, resident and professor-will cause irreparable harm/hurt long-term prospects for the students most trying to help; eliminates core requirements which develops the skills employers most want (communications, critical thinking, digital reasoning, ethical reasoning); urges the board to: 1) Reject any proposals until independent, evidence-based study demonstrates, “no harm to student outcomes, employer recognition, and graduate school eligibility” 2) “Direct the Commonwealth’s affordability efforts toward expanding early college programs, need-based financial aid, and dual-enrollment pathways that reduce cost without reducing learning.” Specifically, she expresses concern that Merrimack’s Applied Bachelors in Communications allows students to complete only one of two foundational theory courses and eliminates all advanced-level (400-level) coursework entirely. “These are not minor adjustments: theory courses are the intellectual backbone of the communication discipline, and advanced coursework is where students develop synthesis, critical thinking, and disciplinary mastery.”</p>	<p>The Board remains committed to equity and its responsibility to ensure access to high-quality postsecondary opportunities for all students. It further recognizes that, for many students—particularly working adults and those balancing family responsibilities—time to degree remains a significant barrier to completing college. In evaluating the proposed pilots, the Board will apply these guiding principles alongside its commitment to consumer protection when making approval determinations. Additionally, learning outcomes for reduced-credit programs will be held to the same expectations as those for traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Further, the Communications proposal allows for greater student flexibility at the 3000 and 4000 level-</p>

<p>Courtney Cahalan, Assistant Professor of English, Bristol Community College</p>	<p>Believes the Board is rushing approval process and these proposals will mainly benefit the financial positions of both Institutions to boost enrollment while reducing students flexibility/ability to change their major, transfer to another school, ability to attend grad school other than at their own institution (Merrimack), narrowing opportunities for professional and personal growth, "The only organizations that will actually benefit from these programs are the colleges and universities who shore up their bottom lines and the corporations who may end up hiring these students, because they will be much more easily controlled."</p>	<p>All pilot programs submitted to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees and, where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across multiple post-completion pathways. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Lastly, in accordance with Section 16.06(g) and Section 16.07(11), and as part of the admissions process, students will be informed of potential risks and required to acknowledge that they are participating in a pilot program authorized under the Massachusetts Board of Higher Education's Degree Regulations for Pilot <u>Proposals on Innovation</u></p>
<p>Peter Stokes/Christ Slatter, Huron Consulting Group</p>	<p>Support both proposals and urges Board to approve-cites benefits such as: reduced time to completion and cost, opportunity for students to enter workforce sooner/ increasing lifetime earnings potential, boost career readiness with experiential learning opportunities, and strengthen alignment with workforce needs/strengthens competitiveness in MA</p>	<p>Comment noted. It is also important to emphasize that the Board takes seriously its responsibility to balance the maintenance of high standards with the creation of space for responsible innovation. The pilot framework is designed to ensure that any new model is carefully tested, rigorously evaluated, and advanced only if it demonstrably serves students well. Pilot programs will continue to be held to the same expectations for student learning outcomes as traditional baccalaureate</p>

Kevin McCarthy, Professor Film/Video Production, Fitchburg State University	Opposed to both proposals-"will not be good for our students-period. Works mainly with first-gen students who would be more susceptible to taking lower credential degrees which will not prepare them for today's challenges and thinking critically in age of AI. In his experience, "100% of student growth, maturing, and job readiness happen in that final 25% of their credits!"	The Board remains committed to equity and its responsibility to ensure access to high-quality postsecondary opportunities for all students. And further recognizes that for many students, particularly working adults and those balancing family responsibilities, time to degree remains a significant barriers to completing college. In evaluating the proposed pilots, the Board will apply these guiding principles alongside its commitment to consumer protection when assessing and making approval determinations. Additionally, learning outcomes for reduced credit programs are held to the same expectations for student learning outcomes as
Rosemary Gormley, Bunker Hill Community College	As a lifelong public educator-strongly opposed and urges the Board to vote both proposals down-believes in balanced curriculum and without it-students will likely not be successful in attending grad school at other institutions or be successful in the workplace; feels the main intent of these proposals is to increase enrollment-not student success and that these proposals were rushed through.	Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. The Board aims to balance maintaining high standards with creating space for responsible innovation. The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves

Representative Angelo J. Puppolo, Jr.
Chairman, Committee on
Intergovernmental Affairs, MA State of
Representatives

Urges the Board to delay action on these proposals-more time needed to fully evaluate these institutions and their implications for students. If approved, this could significantly impact the higher education system (both public and private in MA) and could limit students future career opportunities and options for advanced degrees. MA has been a leader in higher education but not convinced this is the way to go-should allow for more stakeholder involvement to answer questions on transferrability of degrees to other institutions, graduate school admissions, professional licensure requirements; we need a workforce able to innovate and think creatively; "our colleges and universities must continue to uphold the highest academic standards to ensure graduates are fully prepared for success and that an MA degree remains a trusted and respected credential."

The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Further note that programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways.

Tyler Bradley, Chicopee, MA

Advocates to cut these proposals and find other ways to lower costs for students-already low trust in higher education-CT shot a similar proposal down; reduced credit programs reduces time spent in labs, ability to do deeper research, or connect with faculty who can be future references when pursuing advanced degrees.

The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students

Daniel Mulcare, President, Salem Chapter, Massachusetts State College Association, Professor, Politics, Policy, and International Relations Department, Salem State University

Taught for 20 years at Salem State to mostly first-gen and pell eligible students- strongly opposed to both proposals and to the reduced credit degrees in general; "credits 91-120" essential for: processing disciplinary content, making connections with other academic fields, and building connections with peers and faculty...;" both proposals explicitly target students under financial pressure but if students need more credits for graduate/professional school or licensure-federal undergrad aid may no longer be an option; "protect these students-a degree designed for those who need affordability should not permanently close the doors those students need open."

For many students, particularly working adults and those balancing family responsibilities, time to degree and cost remain significant barriers. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. These reduced credit pathways may also create opportunities to integrate high-impact practices—such as project-based learning, internships, and employer-aligned experiences—that can deepen critical thinking and problem-solving in ways that complement, and in some cases enhance, traditional classroom-based learning. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for

<p>John Mulrooney, Professor, Creative Writing, Film, Irish Studies, Bridgewater State University</p>	<p>Generally opposed-would weaken credentials under guise of affordability- instead restore state funding. Reduced credits closes the doors to grad and professional schools, licensure, long-term advancement, greatest risks to the most vulnerable, and NECHE emphasized students may not be eligible for future federal aid if change mind to pursue traditional bachelor program, will create a two-tier system that will widen inequality in MA. Liberal arts education matter in age of AI also prepares students for employment, civic participation, and lifetime of needing to adapt professionally. MA should lower financial barriers, not standards.</p>	<p>In accordance with Section 16.06(g) and Section 16.07(11), and as part of the admissions process, students will be informed of potential risks and required to acknowledge that they are participating in a pilot program authorized under the Massachusetts Board of Higher Education's Degree Regulations for Pilot Proposals on Innovation. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is</p>
<p>Walter Smelt III, Professor of English, Bunker Hill Community College</p>	<p>Opposed to both proposals-"this plan with cheapen, in all senses of the word, college degrees for students." Acknowledges affordability is a concern and commends free community college; but "should not discount students' education instead of financial cost." Students need broad education, time to think through difficult questions especially with threat of AI. "Real learning takes time, don't steal that from our students."</p>	<p>The comment regarding funding is outside the scope of this proposal; the broader opposition is acknowledged. The innovation regulation creates an opportunity for institutions to reconsider how and where learning occurs, recognizing that many students, particularly adult learners and those with prior academic or work-based experience, bring substantial, relevant competencies that can be more effectively integrated into degree pathways. It is also important to emphasize that learning outcomes remain unchanged. Pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in</p>

<p>Audrey Pereira, Professor of Business Administration, Fitchburg State University</p>	<p>Expressing opposition to Merrimack's shortened business degree as full-time business professor for past 20 years and request the board reject this proposal- points specifically to the elimination of "Operations Management" and "Legal Environment of Business" as being core disciplines and raises concerns that other courses added in its place serves as "double counting towards major and core requirements."Also raises concern that for CPA license in MA requires 150 credit hours and even with Master's degree, students in this program will fall short of that requirement. Will diminish academic rigor and leave students less professional prepared.</p>	<p>Please see response to Comment #2. Further, the prpposal is intended to be a general business degree that does not require students to concentrate in a specific business discipline. The "Legal Environment of Business" is offered as MGT 3130 in year two of the proposed curriculum. This program would not be beneficial for students interested in a CPA license; the department will work with Merrimack concerning student advisement and appropriate disclaimer materials.</p>
<p>Rachelle A Dermer, Associate Professor, Film and Video, Fitchburg State University</p>	<p>Expressing serious concerns with both proposals: 90 credits does not equal a bachelor's degree, for students that want to enter the workforce sooner-there are associate degrees and tech schools; do not degrade the quality of education in MA-as a hub of innovation, students who are most vulnerable will be most hurt-will be less qualified than peers, most likely to be replaced by AI, and shortened degrees eliminates 4th year opportunities such as: capstones, theses, minors, internships. "This is not an innovative pilot but rather epitomizes an extraordinary lack of insight."</p>	<p>For many students, particularly working adults and those balancing family responsibilities, time to degree and cost remain significant barriers. Thoughtfully designed reduced-credit pathways can expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. These reduced credit pathways may also create opportunities to integrate high-impact practices—such as project-based learning, internships, and employer-aligned experiences—that can deepen critical thinking and</p>

Joseph Nardoni, Professor of English and Creative Writing, Middlesex Community College

Urge the Board not to approve Merrimack's reduced credit degrees-120 credit hour degree program meant to educate whole student-to be good citizens as well as to be career-ready; these programs will provide fewer opportunities for advanced degrees unless become "Double Warrior" with their own grad programs; proposal does not provide evidence reduced degree is as academically valuable, "treating education as a commodity."

The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Further note that programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways.

Olivia Rossetti, Associate Librarian,
Fitchburg State University

Object to both proposals-"neither provides validated research that a reduced credit bachelor's degree produces educational outcomes equivalent to a 120 credit-degree." Further states there is no evidence to support 3 year degree programs either. "Should not approve an experiment on students based on the institutions' promise to measure outcomes carefully afterward."

We agree that any baccalaureate program, regardless of credit length, must demonstrate that students achieve learning outcomes comparable to those of traditional 120-credit programs. At the same time, it is important to clarify that the purpose of the proposed pilots is not to conduct experiment on students, but to evaluate thoughtfully designed, evidence-informed innovations, under clear parameters and with strong oversight. Pilot programs are subject to defined expectations, including alignment with established student learning outcomes, accreditation standards, and program approval requirements. Importantly, these pilots are time-limited and subject to review. Approval to proceed does not presume permanent adoption; rather, continuation or expansion would be contingent upon demonstrated evidence that programs meet or exceed established standards.

<p>Rene Reeves, Professor of History, Fitchburg State University</p>	<p>Generally opposes-will erase liberal arts education which is meant to be foundation of university education and equate to vocational training. Students will not be prepared to be informed citizens and face challenges transferring to other institutions or obtaining advanced degrees. Answer to affordability is not to reduce standards and quality but to restore funding to support students and public higher education</p>	<p>The comment regarding funding is outside the scope of this proposal; the broader opposition is acknowledged. Further note that programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Additionally, as part of its review, the Board and the Department expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive</p>
<p>Karina A. Bautista, Associate Professor of Spanish Language, Latin American, and Latino/a/x Cultures, Fitchburg State University</p>	<p>Urge Board not to approve any proposals reducing bachelor's degree to sub-120 credits-will weaken liberal arts foundation, will create less informed citizens vulnerable to "political and economic manipulation." Keep the rigor and well-rounded education that a bachelor's degree stands for; urges policymakers to restore state funding to higher education and expand financial support for students instead.</p>	<p>The comment regarding funding is outside the scope of this proposal; the broader opposition is acknowledged. The innovation regulation creates an opportunity for institutions to reconsider how and where learning occurs, recognizing that many students, particularly adult learners and those with prior academic or work-based experience, bring substantial, relevant competencies that can be more effectively integrated into degree pathways. It is also important to emphasize that learning outcomes remain unchanged. Pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in</p>

Mahmoud El-Hashash, Bridgewater State University	Opposed to both proposals-"should not allow a few institutions to make such a critical decision on behalf of all of us and our students under the misleading name of 'innovation'." These proposals pose an "existential threat to public education" will weaken the quality/value of education, civic participation, and workforce readiness.	The general opposition expressed in the comment is noted.
Steve Greenberg, Bridgewater State University	Having been involved in education for the past 50 years, concerned about the harmful impacts to students of a paired down degree; more beneficial for students to be exposed to a variety of disciplines/courses. "Please protect our students."	The general opposition expressed in the comment is noted.
Reid Parsons, Professor of Environmental, Geographic & Public Health Sciences, Fitchburg State University	Concerned about these proposals as "watered-down degrees"; don't think they are equivalent to standard 120 credit bachelor programs in quality and lack the benefits of a liberal arts education for expanding mindsets/developing critical thinking skills; instead tax dollars should be subsidizing public higher ed "back to 1990 levels" and take the financial burden off students.	The comment regarding funding is outside the scope of this proposal; the broader opposition is acknowledged. Further note that programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do.

<p>Regina Daus-Haberle, Professor, English Department, Bridgewater State University</p>	<p>"This is no "choice" at all. Would you have taken courses that were not required of you when you were 18-22? Courses that only later in your career you recognize prepared you in ways you could not foresee? It is our role as educators to provide structure, guidance, AND a high bar to prepare students for the rest of their lives--which includes showing them that deep education matters and IS WORTH THE EFFORT, TIME, and MONEY. Please do not implement this soft bigotry of low expectations under the guise of benefitting future students."</p>	<p>The innovation regulation creates an opportunity for institutions to reconsider how and where learning occurs, recognizing that many students, particularly adult learners and those with prior academic or work-based experience, bring substantial, relevant competencies that can be more effectively integrated into degree pathways. It is also important to emphasize that learning outcomes remain unchanged. Pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in</p>
<p>Brooke Merritt, Assistant Professor, Communication Sciences and Disorders, Bridgewater State University</p>	<p>Strongly opposed; don't "cheapen meaning of a college education." Higher ed not meant to be rushed through to tick the boxes but to create informed citizens, ethical professionals, able to adapt to complex and changing world.</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Matthew Savage, Performing Arts Professor, Bunker Hill Community College</p>	<p>Oppose both proposals- imply that core competencies not as important but they matter more than ever to develop critical thinking skills in age of AI, seems like these proposals are meant more to boost enrollment, not to improve student success.</p>	<p>The general opposition expressed in the comment is noted.</p>

Melinda R. Tarsi-Goldfien, American
Politics Professor, Bridgewater State
University

Generally opposed to both proposals and urge Board to reject-would
undermine and reduce the breadth, rigor, and well-roundedness of a standard
120 credit degree while making students less competitive to employers, less
likely to be accepted to graduate programs; first gen students would find this
appealing and think they'd be saving time and money only to find their degree is
not valued, creating two-tier education system.

Please see response to Comment #2 and Comment #4.

Senator Paul W. Mark, Berkshire,
Hampshire, Franklin, and Hampden District

Urge the Board to delay action on "so-called applied bachelor programs-"need time to assess impacts on higher education in MA; do not think enough time was given to stakeholders to deliberate fully; must ensure students are well-prepared to innovate and think critically and that higher ed in MA prepares them for the future.

We agree that any baccalaureate program, regardless of credit length, must demonstrate that students achieve learning outcomes comparable to those of traditional 120-credit programs. It is also important to clarify that the purpose of these pilots is not to experiment on students, but to evaluate thoughtfully designed, evidence-informed innovations under clear parameters and strong oversight. Pilot programs are subject to defined expectations, including alignment with established student learning outcomes, accreditation standards, and program approval requirements. These pilots are time-limited and subject to review. Approval to proceed does not presume permanent adoption; rather, continuation or expansion will be contingent upon demonstrated evidence that programs meet or exceed established standards. The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well.

Anna-Maria Goossens

Strongly opposed-many fields require advanced education and a bachelor's degree is the minimum standard-these reduced credit degrees will leave students less prepared and will likely diminish the reputation of any institution offering them; fewer elective credits means fewer opportunities to develop critical thinking across multiple disciplines.

In advancing and evaluating these pilots the BHE does not intend to lower standards or create a tiered system of higher education, but to modernize pathways so they remain rigorous, relevant, and responsive to the needs of today's students and the economy. As part of the review process, the Board and the Department expect pilot proposals to consider labor market demand and, where appropriate, to prerequisites for graduate and professional education. This approach is designed to ensure that students remain competitive across a range of post-completion pathways. All pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or

Heike Schotten Professor of Political Science, UMass Boston

Opposed and concerned about these proposals-cutting 1/4 of required gen ed courses will make these degrees cost less but it will also mean students will learn and know less and will be valued less by employers and graduate programs; this will widen inequality as disadvantaged students will receive a lower tier education and less opportunities. "this will further reduce public education's potential for social mobility and relegate low income and working class students to a permanent underclass upon graduation."

We also recognize that for many students, particularly working adults and those balancing family responsibilities, time to degree and cost remain significant barriers. Thoughtfully designed reduced-credit pathways can expand access to high-quality applied baccalaureate degrees without compromising academic standards. The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. As part of its review, the Board and the Department also expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach

<p>Glynn Lloyd, President and Founder, City Fresh Foods</p>	<p>Urge the Board to reject these proposals-"a bachelor's degree should represent more than technical training; most transformative experiences happen in the final year; employers want graduates who can think across disciplines, work in teams, and adapt to new challenges which are gained through general education/liberal arts; "find solutions that strengthen affordability, completion, and access while maintaining academic rigor, breadth, and value of a traditional bachelor's education."</p>	<p>Reduced credit pilot programs submitted for review by the Board are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. They may differ in curricular design, but not in the rigor or scope of what students are expected to know and be able to do. The Board expects that pilot programs are developed with careful attention to labor market demands and, where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across multiple post-completion options. It is also important to point out that in alignment with the Board's commitment to socioeconomic mobility, applied and experiential learning are central to the review of a program. As such we recognize that the inclusion of high-impact practices—such as project-based learning, internships, and employer-aligned experiences—can deepen critical</p>
<p>Erica Scharrer, Professor, Department of Communication, UMass Amherst</p>	<p>Strongly opposed as a Professor for the past 27 years-in particular point to deficits in Merrimack's Applied Communication program as not having enough communication and media studies courses and lacking gen ed courses to provide breadth across disciplines and this will make it more difficult for students to pursue graduate studies or be competitive in the workforce or understand the world more fully and themselves as compared to their peers who graduate from a standard bachelor's degree.</p>	<p>Please see response to Comment #2. Further, the Communications proposal allows for greater student flexibility at the 3000 and 4000 level-courses, allowing students to focus on "applied" or praxis-oriented courses befitting the major. The proposed curriculum includes 40 credits in general education as well as 16 credits of open electives in which students can take any courses pertinent to their professional goals.</p>

Todd C. Harris, Associate Professor of Management, Bridgewater State University

As former HR management consultant, taxpayer, citizen, parent, and graduate of a flagship public university-"respectfully urge Board to reconsider these proposals: 1) "very few affluent parents would not consider this for their own children;"2) lesser than degrees would put graduates at a competitive disadvantage, 3) more difficult for faculty to mentor students, 4) less opportunity to do high impact activities like: internships, study abroad etc, 5) would be a "low-cost race to the bottom."

Reduced credit pilot programs submitted for review by the Board are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. They may differ in curricular design, but not in the rigor or scope of what students are expected to know and be able to do. The Board expects that pilot programs are developed with careful attention to labor market demands and, where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across multiple post-completion options. It is also important to point out that in alignment with the Board's commitment to socioeconomic mobility, applied and experiential learning are central to the review of a program. As such we recognize that the inclusion of high-impact practices—such as project-based learning, internships,

Lindsay Sabadosa, State Rep, First Hampshire District

Three year degrees may offer promising response to current challenges in higher ed, especially with enrollment declines and recent closures-but these proposals should be evaluated carefully to ensure they do not diminish the value of the bachelor's degree or further deepen disparities in access and opportunities.

Comment noted. The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. As part of its review, the Board and the Department also expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach helps ensure that students remain competitive across a range of post-completion pathways.

Dr. Polina Sabinin, Professor of Mathematics, Bridgewater State University

Provided a word document with 96 individual public comments under the petition, "Protect the Value of the Baccalaureate Degree in Massachusetts" representing faculty, educators, students, and community members across the Commonwealth all in opposition to "watering down the degree" and creating a two-tier education system. Provided "examples of written testimony from people who have signed a larger petition." The larger petition was NOT provided. The provided examples are listed from Comment #100 through Comment #195.

We agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating pilot programs we do not intend to lower standards or create a tiered system of higher education, but seek to modernize pathways so they remain rigorous, relevant, and responsive to the needs of today's students and the economy. As part of the review process, the Board and the Department expect pilot proposals to consider labor market demand and, where appropriate, to prerequisites for graduate and professional education. This approach is designed to ensure that students remain competitive across a range of post-completion pathways. All pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The Board aims to balance maintaining high standards with

Jakari Griffith, Associate Professor of Management, Bridgewater State University

As an educator, academic administrator, citizen, and taxpayer, have serious concerns with these proposals: 1) would create a two-tier education system, 2) would eliminate high-impact activities such as: study abroad, internships, research, etc from the 4th year, 3) less mentoring from faculty at a time when students need more support, 4) lesser credential would be a competitive disadvantage, 5) solving the wrong problem-better to address affordability through "sustained public investment...an informed citizenry prepared to think is one of our greatest public goods."

In advancing and evaluating pilot programs the BHE does not intend to lower standards or create a tiered system of higher education, but to modernize pathways so they remain rigorous, relevant, and responsive to the needs of today's students and the economy. As part of the review process, the Board and the Department expect pilot proposals to consider labor market demand and, where appropriate, to prerequisites for graduate and professional education. This approach is designed to ensure that students remain competitive across a range of post-completion pathways. All pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The Board aims to balance maintaining high standards with creating space for responsible innovation and the pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well.

Rebecca Metcalf, Professor of Mathematics, Bridgewater State University

Opposes both proposals—"reduces undergraduate preparation at precisely the moment when breadth and depth of education are most consequential for students' long term professional viability and shortening a degree in response to workforce disruption is analogous to reducing medical training in response to a public health emergency. It addresses the wrong variable at the wrong time."

Reduced-credit pilot programs submitted for review by the Board are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. While they may differ in curricular design, they should not differ in the rigor or scope of what students are expected to know and be able to do. We expect pilot programs to be developed with careful attention to labor market demand and, where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across a range of post-completion pathways. In alignment with the Board's commitment to socioeconomic mobility, the Board also recognizes that the inclusion of high-impact practices—such as project-based learning, internships, and employer-aligned experiences—can deepen critical thinking and problem-solving in ways that complement, and in some cases enhance, traditional classroom-based approaches. The Innovation Regulation enables institutions to explore these approaches in a structured

Irina Seceleanu, Professor of Mathematics,
Bridgewater State University

Submitted a 20 page public comment in opposition to Merrimack's reduced credit bachelor degree programs-argues the proposals "are based on unvalidated research, self-referential evidence, and curricular equivolence claims that the College's own documents contradict," and the proposal "fails to meet the regulatory threshold for approval on multiple independent grounds."

We agree that any baccalaureate program, regardless of credit length, must demonstrate that students achieve learning outcomes comparable to those of traditional 120-credit programs. It is also important to clarify that pilot programs are subject to defined expectations, including alignment with established student learning outcomes, accreditation standards, and program approval requirements. In addition to a review by the Board, all proposals were evaluated by NECHE and are only allowed to proceed before the Board after they recieve an affirmative vote by NECHE. These pilots are time-limited and subject to review. Approval to proceed does not presume permanent adoption; rather, continuation or expansion will be contingent upon demonstrated evidence that programs meet or exceed established standards. The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well

Rebecca Bednarz, Fitchburg State University

Generally opposed-would weaken credentials under guise of affordability- instead restore state funding. Reduced credits closes the doors to grad and professional schools, licensure, long-term advancement, greatest risks to the most vulnerable, and NECHE emphasized students may not be eligible for future federal aid if change mind to pursue traditional bachelor program, will create a two-tier system that will widen inequality in MA. Liberal arts education matter in age of AI also prepares students for employment, civic participation, and lifetime of needing to adapt professionally. MA should lower financial barriers, not standards.

The comment regarding funding is outside the scope of this proposal; the broader opposition is acknowledged. Further, we agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating these pilots we do not intend to lower standards or create a tiered system of higher education, but seek to modernize pathways so they remain rigorous, relevant, and responsive to the needs of today's students and the economy. As part of the review process, the Board and the Department expect pilot proposals to consider labor market demand and, where appropriate, to prerequisites for graduate and professional education. This approach is designed to ensure that students remain competitive across a range of post-completion pathways. All pilot programs

Steven Edwards, Professor, English Studies, Fitchburg State University

Generally opposed-would weaken credentials under guise of affordability- instead restore state funding. Reduced credits closes the doors to grad and professional schools, licensure, long-term advancement, greatest risks to the most vulnerable, and NECHE emphasized students may not be eligible for future federal aid if change mind to pursue traditional bachelor program, will create a two-tier system that will widen inequality in MA. Liberal arts education matter in age of AI also prepares students for employment, civic participation, and lifetime of needing to adapt professionally. MA should lower financial barriers, not standards.

In accordance with Sections 16.06(g) and 16.07(11), and as part of the admissions process, students will be informed of potential risks (including impacts on financial aid) and will be required to acknowledge their participation in a pilot program authorized under the Massachusetts Board of Higher Education's Degree Regulations for Pilot Proposals on Innovation. All pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degree and where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across multiple post-completion options.

Carley Paleologopoulos, Advising and Student Success, UMass Amherst

Oppose both proposals-students under the most financial pressure will be the ones to pursue these degrees and will bear the risks; may close the door to graduate/professional schools, licensure pathways, may be less competitive in the workplace; would rather see funds from the Fair Share amendment utilized to fully fund public higher education.

The Board remains committed to equity and its responsibility to ensure access to high-quality postsecondary opportunities for all students. We further recognize that, for many students—particularly working adults and those balancing family responsibilities—time to degree remains a significant barrier to completing college. In evaluating the proposed pilots, the Board will apply these guiding principles alongside its commitment to consumer protection when making approval determinations. Additionally, all pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degree and where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across multiple post-completion options. These reduced credit pathways may also create opportunities to integrate

Dave Rogers, State Rep, 24th Middlesex District

Respectfully request delaying action on both proposals; heard from concerned constituents about creating a two-tier education system where only the affluent benefit from the full degree; states education is a tool for social and economic mobility so must protect access and opportunity for all; does not believe there was enough deliberation among stakeholders when BHE accepted proposals so asks Board to take into account all the public comments, public testimony, engage and follow up with stakeholders in higher education to fully understand the impacts and possible pitfalls of these proposals. Should not rush into decisions that impact "our prized system of higher education in Massachusetts."

We agree that Massachusetts must continue to uphold the highest standards in higher education. Further, any baccalaureate program, regardless of credit length, must demonstrate that students achieve learning outcomes comparable to those of traditional 120-credit programs. It is also important to clarify that the purpose of these pilots is to evaluate thoughtfully designed, evidence-informed innovations under clear parameters and strong oversight. Pilot programs are subject to defined expectations, including alignment with established student learning outcomes, accreditation standards, and program approval requirements. These pilots are time-limited and subject to review. Approval to proceed does not presume permanent adoption; rather, continuation or expansion will be contingent upon demonstrated evidence that programs meet or exceed established standards. The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it

Joanna Gonsalves and Teresa Lyons,
Pscyhology Department, Salem State
University

As psychology professors-strongly oppose both proposals for sub 120 bachelor degrees but speaking specifically about the Applied psychology degree at Merrimack as it "falls short of the American Psychological Association's guidelines for undergraduate psychology major," does not provide enough breadth and advanced coursework to prepare students for graduate education and long term career advancement, proposal relies heavily on 16 credit likely unpaid internships while students are still charged full tuition at that time, and "while it may provide a faster pathway into certain entry-level positions, we are not persuaded that it provides students with the same long-term educational and professional opportunities as a traditional bachelor's degree."

We also recognize that for many students, particularly working adults and those balancing family responsibilities, time to degree and cost remain significant barriers. Thoughtfully designed reduced-credit pathways can expand access to high-quality baccalaureate degrees without compromising academic standards. The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. As part of its review, the Board and the Department also expect pilot proposals to give careful

Emelia Cooper, Senior Academic Advisor,
UMass Amherst

Strongly opposed and deeply concerned about these "dangerous proposals" speaking as both a senior academic advisor and graduate of one of Merrimack's grad programs, "disappointed they are one of the institutions proposing this unsubstantial course of study for students." Believes these proposals would hurt students chances of gaining key experiences, (such as double majoring, adding a certificate, broadening their education through electives in other departments, completing a senior thesis or capstone project) and make them less competitive professionally and for admission into graduate programs. Urges board to reject both proposals.

Reduced-credit pilot programs submitted for review by the Board are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. While they may differ in curricular design, they should not differ in the rigor or scope of what students are expected to know and be able to do. The Board expects pilot programs to be developed with careful attention to labor market demand and, where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across a range of post-completion pathways. We also recognize that the inclusion of high-impact practices—such as project-based learning, internships, and employer-aligned experiences—can deepen critical thinking and problem-solving in ways that complement, and in some cases enhance, traditional classroom-based approaches. The Innovation Regulation enables institutions to explore these approaches in a structured

Taylor Hall, Associate Professor,
Bridgewater State University

Strongly opposed-concerned about creating a two-tier education system that would disproportionately impact-low income, first gen and historically marginalized students the most; social work benefits from a liberal arts foundation to develop critical thinking, communication and ethical decision making skills-needed in the workforce; opportunities for research, internships, and advanced research may be lost due to the compressed nature of these applied degrees, many students obtain their first jobs through these internships and these are requirements for CSWE accreditation in social work at BSU; may also leave students less prepared for graduate work, professional licensure, and employment. Invest in affordability, don't reduce educational opportunities.

The Board remains committed to equity and its responsibility to ensure access to high-quality postsecondary opportunities for all students. It further recognizes that, for many students—particularly working adults and those balancing family responsibilities—time to degree remains a significant barrier to completing college. In evaluating the proposed pilots, the Board will apply these guiding principles alongside its commitment to consumer protection when making approval determinations. The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. As part of its review, the Board and the Department also expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach helps ensure that students remain competitive across a range of post-completion pathways.

<p>Jennifer Hartsfield, Professor and Chair, Criminal Justice, Bridgewater State University</p>	<p>Speaking specifically about Merrimack's 95 credit proposed Criminal Justice degree-has serious concerns for a number of reasons: the proposal does not meet PCIPP standards for police officers which is also used for pay incentives in obtaining advanced degrees, would limit graduate opportunities at any other institution other than Merrimack and in other adjacent fields such as: MSW, law school, PhD programs, cybersecurity and more by subbing out many upper level major courses with lower division courses and eliminating statistics, methodology and theory courses. Do not limit choices for students and be a race to the bottom, we are a leader in Education in Massachusetts, "let's build something better."</p>	<p>We agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating these pilots we do not intend to lower standards or create a tiered system of higher education, but seek to modernize pathways so they remain rigorous, relevant, and responsive to the needs of today's students and the economy. As part of the review process, the Board and the Department expect pilot proposals to consider labor market demand and, where appropriate, to prerequisites for graduate and professional education. This approach is designed to ensure that students remain competitive across a range of post-completion pathways. All pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The</p>
<p>Brad Freeman, Vice President for Government Relations, AICUM</p>	<p>Provided letters of support on behalf of AICUM for both Merrimack and Suffolk proposals. Urges board to act quickly to approve and states these proposals will "expand access in high demand professions and provide high-quality, workforce aligned pathways for students who desire to earn a bachelor's degree in less than four years and these proposals will "help the Commonwealth respond to these workforce shortages in a responsible and innovative way."</p>	<p>Comment noted. It should also be noted that the Board remains committed to equity and its responsibility to ensure access to high-quality postsecondary opportunities for all students. It further recognizes that, for many students—particularly working adults and those balancing family responsibilities—time to degree remains a significant barrier to completing college. In evaluating the proposed pilots, the Board will apply these guiding principles alongside its commitment to consumer protection when making approval determinations. Additionally, pilot programs are subject to defined expectations, including alignment with established student learning outcomes, accreditation</p>

Kevin Hefferan, East Falmouth, MA

Strongly opposed to both reduced credit bachelor proposals-MA has a top-rate public education system-do not erode standards to creating global, educated citizenry-students benefit from required courses in language, historical studies, the sciences, and mathematics, "now more than ever we need high standards to combat attacks on education."

We agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating these pilots we do not intend to lower standards or create a tiered system of higher education, but seek to modernize pathways so they remain rigorous, relevant, and responsive to the needs of today's students and the economy. All pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do. Approval to proceed does not presume permanent adoption; rather, continuation or expansion will be contingent upon demonstrated evidence that programs meet or exceed established standards. The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well.

<p>Jennifer Sherman, Associate Professor of Business, Bunker Hill Community College, Adjunct Faculty of Accounting, Northeastern University</p>	<p>Strongly opposed to both reduced credit bachelor proposals. Argues that it creates a lower-value degree that limits students academic and career flexibility. Contends that the proposals primarily benefit the institutions - generating additional revenue and funneling students into their graduate programs, while leaving graduates with fewer transfer and admission opportunities elsewhere. Argues that these types of degrees could narrow students' long-term career growth and economic mobility, benefiting colleges and employers more than students.</p>	<p>All programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degree and where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across multiple post-completion options. Approval to proceed does not presume permanent adoption; rather, continuation or expansion will be contingent upon demonstrated evidence that programs meet or exceed established standards.</p>
<p>Jim Crowley, Bridgewater State</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "This terrible idea must be stopped. Students today are already woefully underprepared for undergraduate work--and pushing them through the system even faster, in the name of work-readiness or similar catchphrases, is decidedly wrong-headed. A college degree is more than work training. This reduced credential amounts to a fraudulent effort to make what we all know to be inferior equivalent to the 4-year traditional path."</p>	<p>Please see response to Comment #85.</p>

Asha Nadkarni, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "The 90-credit BA creates a two-tier system and guts the liberal arts. As a parent and a lifelong educator, I think it is outrageous that this is even being considered. I am especially shocked to see this proposal in Massachusetts."	Please see response to Comment #85.
Nicole LeBlanc, Leominster Public Schools	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "We need to address the affordability of a college education and provide adequate funding- not to give students less education and call it access. "	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.
Lisa Delissio, Salem, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "If this proposal goes through, a different name is needed for the degree to avoid brand confusion."	Per Section 16:06 (2e), the proposal speaks to nomenclature and is consistent with NECHE naming and distinction guidance.
William Hibbard, East Sandwich, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "Lowered expectations will yield lowered outcomes."	Please see response to Comment #85.
Mary Kate Keyes, UMass Lowell	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "Diminishing the number of credits needed to earn a bachelor's degree diminishes the value of this degree."	Please see response to Comment #85.
MSP Kurland, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "Massachusetts, of all states, a leader in education, should not endorse these misguided "BA light" programs. Under the cynical guise of college affordability, the 90-credit bachelor's degree will augment, rather than address, educational inequity."	Please see response to Comment #85.
Limari Rivera, Fitchburg, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "I worked in Higher Ed for 23 yrs before moving to the public school system. I know how much work is put into curriculum at colleges."	The general opposition expressed in the comment is noted.

<p>Carol Sharick, UMass Amherst</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "I lead a career services office. One less year puts students at a disadvantage in the job search, because they have not had time to build the skills and internship experience the extra year would give them. It limits their ability to study abroad. And it would put public students at a disadvantage when competing against college grads with a four year, fully fleshed out degree. This is a bad idea. Lots of students are already able to graduate early with their AP credits. We don't recommend that they do, for the reasons stated above. And with federal pressure on graduates earning a good wage, this 90 credit option is not putting anyone on a higher earning."</p>	<p>Please see response to Comment #85.</p>
<p>Teresa Cheung, Salem, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "Why create a underclass of poorly educated people? This will widen the skills gap exacerbate social and economic disparities."</p>	<p>Please see response to Comment #85.</p>
<p>Kelly Morgan, Fitchburg State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "Our educational system has been the greatest in the world. Students from all over the world want to come here and study. A degree is something to achieve, not to acquire with minimal effort and condensed time, effort, failures, and reflection."</p>	<p>Please see response to Comment #85.</p>
<p>Joya Misra, UMass Amherst</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See # 85) - "The last thing we need to be doing is weakening the education and preparation of students. AI is already undermining the workforce. College degrees are about developing the critical thinking skills of students so they can understand the world and flexibly adapt to a changing economy and society. We want to strengthen this, not weaken it, and a short credit baccalaureate will surely further weaken the power of college degrees and our workforce."</p>	<p>Please see response to Comment #85.</p>

Lisa Gim, Fitchburg State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This proposal guts the essence of a four-year college education, taking away key courses and giving the students a water down partial version of a four year college degree. It must not be called a BA degree because it is not. It is much more like an associates degree Massachusetts was once famous for its educational system. Please do not allow the gutting and watering down of a college degree in the state that once lead the country and education."	Please see response to Comment #85. Further, Per Section 16:06 (2e), the proposal speaks to nomenclature and is consistant with NECHE naming and distinction guidance.
Lanier Sammons, Maynard, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "90-credit degrees make use a less educated populace, reduce economic mobility, and cut the heart of higher education in the process."	Please see response to Comment #85.
Margaret Johnson, Bridgewater State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This is hugely concerning. Do we want graduates who are less prepared for this complex world?"	Please see response to Comment #85.
Rebecca Bailey, Reading, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "As a librarian in higher ed for many years, I am dismayed to think that this state which prides itself on its educational offerings would consider offering watered down bachelor's degrees. That is a "solution" that doesn't actually help anyone or solve anything and I don't believe we should create what will amount to a two tiered system."	Please see response to Comment #85.

Cheryl Luongo, Melrose, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I am a retired teacher who served in the Springfield Public Schools as a former special education teacher for 27 years and as an Instructional Leadership Specialist for four years. During my last four years, I encountered a very disconcerting situation. New teachers were entering their careers critically unprepared academically, in both their content and pedagogy. They lacked the core background knowledge to understand the nature and needs of their students. This was especially true regarding their ability to implement effective behavior management systems to maintain safe, peaceful, and comfortable classroom environments for all students. Consequently, they were unable to teach. At this time, if an individual desired to be a teacher and was able to pass the MTEL, they could obtain a job as a teacher. However, even with a four-year baccalaureate degree, these new teachers were entering this profession drastically unprepared, especially when entering urban school systems. This is actually why the position of an "Instructional Leadership Specialist" was created in the first place. Essentially, our primary role was to mentor new teachers, offering them a very direct and supportive approach in an effort to help them achieve success. I am devastated to learn about this proposal to eliminate a four-year, 120-credit baccalaureate degree. I adamantly oppose this."	Please see response to Comment #85.
Jen Meagher, Amesbury, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Invest in education and our collective future. Stop feeding this horrendous gap in haves and have nots. What a terrible world we are creating."	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.
Avon Lewis, Arlington, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I am appalled at this plan. If you want to offer a three year degree, offer it, but it is not a bachelors. "	Per Section 16:06 (2e), the proposal speaks to nomenclature and is consistent with NECHE naming and distinction guidance.

Kevin McCarthy, Fitchburg State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "100% of student growth, maturing, and job readiness happens in that final 25% of their credits! Do we want a MORE prepared workforce? Or a LESS prepared workforce? In an age where AI is going to lead to less critical thinking ability, do we want students who have a better foundation to think critically or a worse foundation? 90 Credits is not good for students. Period. Thank you for considering these remarks, from an 18 year and counting Higher Ed faculty professor. Best wishes, Kevin McCarthy Watertown, MA"	Please see response to Comment #85.
Mahmoud El hashash, Quincy, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "The move toward 90-credit degrees poses an existential threat to our public higher education system and will likely affect jobs as well as the quality of education. These ill-thought-out proposals could create a domino effect that weakens every structure from student learning and civic education to job quality, workforce readiness, and the long-term value of a college degree. We should not allow a few institutions to make such a critical decision on behalf of all of us and our students under the misleading name of innovation."	Please see response to Comment #85.
Paul Fredette, Bridgewater State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "We have associate degrees and decades of experience in the current 120 credit programs. I've started and been businesses for years and this will only confuse hiring and advancement to graduate programs. "	The general opposition expressed in the comment is noted.
Katie Dube Vaughn, Tyngsborough, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Please do not accept 90 degree bachelor credit for educators."	The general opposition expressed in the comment is noted.

Gail Marrella, Bridgewater State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I'm concerned that lowering the credit requirement could diminish the depth and quality of students' educational experiences. A college degree opportunities for critical thinking, interdisciplinary learning, and personal growth in their discipline. Reducing the number of required credits may limit these opportunities and could affect how the value of the degree is perceived by employers and graduate programs. "	Please see response to Comment #85.
John Sylvia IV, Worcester, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "The 90 credit baccalaureate degree erodes our education system at a time when it needs more support than ever. This is a move in the wrong direction! "	The general opposition expressed in the comment is noted.
Linda LeBlanc, Winchendon, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I am very concerned about the 90-credit bachelor's degree. It guts general education which provide key essential skills all students need regardless of their career track and it either removes the opportunity for internships and study abroad or reduces the core curriculum in the field. Associating it as a bachelor's is also very misleading for first generation students and their parents who may not realize the repercussions for going onto a master's or into the workforce with a lesser degree."	Please see response to Comment #85.
Lisette Espinoza, Amesbury, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "We - in Massachusetts- believe protecting the legacy of higher education that has ensured long-term successes in creativity, innovation, and leadership skills means that we lead the country and world. "	The general opposition expressed in the comment is noted.

Lorenz Glaser, West, Newton, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "If we could provide a rigorous 3-year degree more or less free like they do in Europe, that would make a lot more sense. Cutting a standard US degree to 3/4 and still charging individuals too much is a bad idea. Let's fix the thing that's broke and adequately fund education- especially for low income students."	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.
Deborah Henson, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I oppose the approval of bachelor degrees in Massachusetts with fewer than 120 credits. This weakens the integrity of our higher education programs. "	Please see response to Comment #85.
Sarah Fisher, Lowell, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "The quality of education has been systematically eroded for decades and this is just one more step down a dangerous path. We already have a pathway that involves fewer credits - we call it an associates degree. Since I'm pretty sure we'd all agree that an associates doesn't have the same weight as a bachelors, why would a reduced credit bachelors have the same weight as the one students earn now? Address affordability in a more sustainable manner, please. "	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.
Deborah L Gesualdo, Carver, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Why water down Bachelor degrees in Massachusetts when you are striving for the top? Unless of course, you aren't. Don't tell us what you believe. Show us."	The general opposition expressed in the comment is noted.

DeMisty Bellinger-Delfeld, Fitchburg State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Hi! Please keep the required credits at 120. When students are reading and doing math at historic lows (National Assessment of Education Progress, Fall 2025), it does not follow for us to decrease requirements. Many of our students come to college unprepared for success, and we will be doing a disservice to incoming first-year students or students enrolling in a 90-credit program. Also, the so-called 90-credit baccalaureate degrees calls into question the need of 120 credits, and lessons the rigor of a secondary education."	Please see response to Comment #85.
Noreen Mitchell, Burlington, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Please protect the value of a bachelors degree and do not water down the requirements of earning one. "	Please see response to Comment #85.
Christopher Maggio, New Bedford, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I am particularly disturbed by the potential removal of first-year writing courses at a time when AI is making all writing so expressionless and formulaic."	The general opposition expressed in the comment is noted.
Bob Amey, Bridgewater State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "If costs of higher education are the main concern, then the state should step up and provide better funding. Giving out second rate degrees is not the answer. Universities should not be seen as places to learn a trade. They are places to learn and think outside the box, to expand one's worldview and to understand how to be a thoughtful part of society."	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.
Karen Miller, Belchertown, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "A Bachelor's degree needs to remain 4 years. "	The general opposition expressed in the comment is noted.

Jennie-Rebecca Falcetta, Massachusetts College of Art & Design	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Let's prioritize making college more affordable, not shorter or watered down."	The general opposition expressed in the comment is noted.
Lori Noble, Massachusetts Maritime Academy	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "There are better ways to reduce educational costs than offering students less. Students earning 90 credit degrees will eventually be seen as "less than" when compared to higher credit degrees earned by their peers. We can use "Associates" degrees as an example. Calling it a Bachelor's degree will not make it the same - differences will be obvious when reviewing transcripts. This group of students will be left less educated, less well-rounded and less prepared for the work force. We should pursue methods to cut costs that don't require offer students less. "	Please see response to Comment #85. Further, Per Section 16:06 (2e), the proposal speaks to nomenclature and is consistent with NECHE naming and distinction guidance.
Catherine Benincasa, West Hatfield, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This is a TERRIBLE idea! Reducing the number of credits of a baccalaureate degree in any discipline (I teach mathematics) is succumbing to the "fast-food" mentality of education. Students who want it should be given a strong liberal arts education and not a shortened, watered down one. We need an educated populace now more than ever! Please do not accept this trend in education!"	Please see response to Comment #85.
Rala Cocco, Fitchburg, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This degree makes no sense. Graduates need to be more prepared, not less, in this era of change. Students will invest time and money into this degree which will not compete with a 4 yr degree and this creates a two-tiered system where all-access becomes 1/2 access and the bottom tier is an expensive piece of paper worth little or nothing. "	Please see response to Comment #85.

<p>Brian Payne, Kingston, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "These shortened degrees do not prepare students for advancement in their fields. They may get entry-level jobs but will not be educated or skilled to take on important leadership roles. Since these shortened degrees will likely be most attractive to those of modest income, the limited promotion prospects further perpetuates inequity in our society. Many of these degrees will not meet professional standards and will not be accepted by graduate programs. This is particularly true in psychology and criminal justice. The whole reduced credit program is a bait-and-switch and should be considered consumer fraud. "</p>	<p>Please see response to Comment #85.</p>
<p>Halcyon Mancuso, Newton, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Please do not water down what it means to have a baccalaureate degree."</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Jessica Leach, Braintree, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "It's important to keep rigor with bachelor's degrees. For those wishing shorter degrees, that is the purpose of Associates degrees. "</p>	<p>Please see response to Comment #85.</p>
<p>Patricia Bowers, West Bridgewater, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Please do not water down qualifications for teaching degrees in MA."</p>	<p>Please see response to Comment #85.</p>
<p>Marianna Ritchey, Greenfield, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "As a university professor, I feel the reduced-credit baccalaureate degree will effectively weaken higher-ed in Massachusetts and also create a two-tiered system for a college degree that will privilege already class-privileged students, and punish students without as many resources. This would be such a false step for Massachusetts, which has historically been such a strong supporter of education!"</p>	<p>Please see response to Comment #85.</p>

Siobhan Mei, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Reduced-credit baccalaureate degrees threaten to weaken the meaning of the bachelor's degree in Massachusetts and to create a two-tier system in which students under the greatest financial pressure are asked to accept the riskiest credential. These degrees may close doors to graduate school, professional programs, licensure pathways, and employment. They also narrow the broad liberal arts education students need to adapt across a lifetime of professional change, especially in an economy being reshaped by AI."	Please see response to Comment #85.
Bethany Hall, Bridgewater State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This is the opposite of equity and therefore the opposite of what we stand for in Massachusetts. Please help us stop this short-sighted and elitist "option" that will not support our students and our communities!"	Please see response to Comment #85.
John Gambino, Beverly, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "At a time when students and citizens of the Commonwealth are losing ground to workers from across the country and the world, the need for more critical thinking skills is essential. Reducing the Baccalaureate Degree to just bare bones is short sighted. Students need time to develop these skills or they will simply become replaceable drones to AI and other technology. I understand the desire to provide opportunities to reduce the cost of higher education, but this is the wrong path to follow. "	Please see response to Comment #85.
Anna Penner, UMass Boston	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Please don't diminish students education. They and later generations will suffer for it. "	The general opposition expressed in the comment is noted.

<p>Chalet Seidel, East Hampton, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Stripping degrees of the arts and humanities curriculum at the core of most gen ed programs reinforces the idea that a public university education is merely job training. In contrast, students at elite universities will continue to receive a robust education intended to create active, informed citizens and lifelong learners."</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Lynn Shelley, Florence, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Please do not do this, there are so many attacks on the integrity of higher education right now, we can not withstand another. For example we have a covid generation of unprepared students, and combine that with the fact that we currently have high school students graduating from HS with the equivalent to an associates degree in "college" credits because they took AP classes or "dual enrollment" but they had no experience with an actual professor who has doctoral level knowledge in a field and students acquired none of the critical thinking and communication skills one gets from college, all they can do is memorize flash cards and pass MC tests, but they cannot think.... and now there is this push to lower the credits a degree... this will degrade a BA even more as we are fighting to maintain an integrity. No No No, please do not do it. "</p>	<p>Please see response to Comment #85.</p>
<p>Daniel Welsh, Fitchburg State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Numerous employer surveys and studies in the past decade have found that the employers seek applicants with a broad background and are well-rounded individuals. A sub-120 bachelor's degree goes counter to this. It reduces or eliminates the liberal arts/general education requirements. It also reduces/restricts the number of elective courses in the major. These degrees are bad for the state of Massachusetts and should not be permitted"</p>	<p>Please see response to Comment #85.</p>

Sarah Bittenwieser, Northhampton, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Please keep education valuable and fund it so it's viable."	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.
Jason Hyatt, East Falmouth, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I oppose 90 credit bachelor degrees. Instead, make associates degrees available outside of community college."	The general opposition expressed in the comment is noted.
Erika Briesacher, Auburn, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "The constant rush to squeeze more into less time, which starts in Pre-K and Kindergarten has now come to higher ed. We cannot continue to "speedrun" education, development, and life skills. This isn't about "job training." What this does is crater accessibility to true education- -and it's not something that is being floated for "elite" students and schools, deepening persistent inequity. This will ravage Massachusetts for the long term."	Please see response to Comment #85.
Ellen Martins, Westford, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Massachusetts should lower financial barriers, not expectations. I strongly oppose the 3 year baccalaureate degree."	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.
Kristen Sonntag, Bridgewater State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "DO NOT contribute to the dumbing down of America! In order to maintain being considered a superpower, we need to maintain or even elevate opinions about our aptitude and intellect. Please keep the standard high if having a degree is going to have any real meaning and impact on those receiving it. I would not have had the opportunities for growth in my career with a 90 credit degree. I have advanced due to my understanding of the world and subjects beyond my major. No 90 credit degrees make sense to me!"	Please see response to Comment #85.

<p>Rob Lorenson, Middleboro, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This is bad for massachusetts businesses that depend on highly trained workers. A breadth of knowledge is needed to work our business, to understand more than just punching a clock. Look to the Bridgewater Commitment to solve the problem of campus affordability! This proposal is a day late and dollars short."</p>	<p>Please see response to Comment #85.</p>
<p>Heather Urbanski, Fitchburg, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Calling this degree a Bachelors would be false advertising and is the higher education equivalent of shrinkflation. It should be stopped now before any students are hurt by it. "</p>	<p>Please see response to Comment #85. Further, Per Section 16:06 (2e), the proposal speaks to nomenclature and is consistant with NECHE naming and distinction guidance.</p>
<p>Seth Sorgan, Worcester State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Massachusetts should not be helping MAGA transform the nation into a exploitable pool of uneducated laborers."</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Marjorie Rubright, UMass Amherst</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "A choice under financial pressure is not real choice. It is constraint dressed up as flexibility. "</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Stephen Hurlbut, Bridgewater State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Many professional schools, licensure boards, and graduate programs require a standard 120-credit foundation. A watered-down degree could easily stigmatize Massachusetts graduates and put them at a severe disadvantage"</p>	<p>Please see response to Comment #85.</p>

Shanadeen Begay, Ayer, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "The MCCC is joining with the State Universities and UMass in opposing these programs, because they threaten to: Weaken the meaning of the bachelor's degrees in Massachusetts. Create a two-tier system in which students under the greatest financial pressure are asked to accept the riskiest credential. Close doors to graduate schools (other than their own), advanced professional programs, licensure pathways, and employment. Narrow the broad liberal arts education students need to adapt across a lifetime of professional and political change, especially in an economy and a political discourse being shaped, if not outright warped by AI."	Please see response to Comment #85.
Morgan Grey, Centerville, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "The cost of college is steadily rising, but better solutions than reduced education must be found. Perhaps we should focus more on funding education/professors/instructors and less on updating housing and health centers. The education should be the focus of college."	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.
Robert Maloney, Massachusetts College of Art & Design	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This is unfair to the students who will receive an abbreviated education, unfair to the faculty that will loose jobs, unfair to the universities that will close as a result. "	Please see response to Comment #85.
Randi Zanca, Northbridge, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "You are cheating students and their growth and development. Not all students learn at the same pace either. Give students who need longer the time to grow."	Please see response to Comment #85.

Jeb Booth, Salem State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I am against the 90-credit BA degree. We are in the business of preparing people for a lifetime of potential career changes and for careers that have not yet emerged. Specializing in degrees and limiting the broad scope of courses undermines the development of critical thinkers and a knowledgeable workforce and citizenry. It also creates a sub-class of students with a lower degree and stratifies our society even further into more educational divisions. This will hurt, not help and make the 3 year bachelors be viewed as less than. We have a 2-year degree already, a 3-year degree adds little to nothing and gives a false accomplishment."	Please see response to Comment #85.
Jane Sancinito, Lowell, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This is a terrible idea that will continue to devalue BA degrees with employers"	Please see response to Comment #85.
Paul Johansen, Pittsfield, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This is a terrible idea, and will undermine the value of a public school degree in MA. It is yet another way to undermine public school educators."	Please see response to Comment #85.
Regina Daus-Haberle, Lexington, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This is no "choice" at all. Would you have taken courses that were not required of you when you were 18-22? Courses that only later in your career you recognize prepared you in ways you could not foresee? It is our role as educators to provide structure, guidance, AND a high bar to prepare students for the rest of their lives--which includes showing them that deep education matters and IS WORTH THE EFFORT, TIME, and MONEY. Please do not implement the soft bigotry of low expectations under the guise of benefitting future students."	Please see response to Comment #85.

Susanne Chuku, Longmeadow, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "No 90-credit bachelors degree. This is dangerously shortsighted. In times of AI and changing work conditions, our students must we well rounded to survive in this new work environment."	Please see response to Comment #85.
Patrick Young, UMass Lowell	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "As a UMass professor of 20+ years, I can tell you that this is exactly the wrong approach to the current challenges in higher education. It fortifies the spreading perception of college degrees being meaningless, and is both literally and symbolically a way of further cheapening higher education. "	Please see response to Comment #85.
Paulina Borrego, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Creating this degree alternative is not the answer. We need a commitment to give the good people of Massachusetts and others a strong higher education pathway to good jobs and a livable wage. "	Please see response to Comment #85.
Chris Weeks, Greenfield, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "The 90-credit degree is a short-sighted attempt to increase higher ed enrollment and would create more division in lower-to-middle class students' futures."	Please see response to Comment #85.
Julie Boss, Jamaica Plain, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Don't create an inequitable 2-tiered system, which would hurt those who need access to a full education the most. "	Please see response to Comment #85.
Rachel Trousdale, Belmont, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I am very concerned about the 90-credit program, which threatens to create a two-tiered degree system and undermine the value and reputation of public universities' BAs. I applaud the goal of increasing college affordability, but the way to do that is by increasing funding, not decreasing learning. Sincerely, Professor Rachel Trousdale"	Please see response to Comment #85.

Laura Vish, West Roxbury, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "What about offering free tuition to students graduating with a degree in education instead, so that our students are taught by adequately trained professionals?"	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.
Gregory Chaplin, Bridgewater State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "These are NOT baccalaureate degrees. This is a fundamentally deceptive idea designed to undermine the education of the workforce and value of all college degrees. "	Please see response to Comment #85. Further, Per Section 16:06 (2e), the proposal speaks to nomenclature and is consistent with NECHE naming and distinction guidance.

Tyler Bradley, Chicopee, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Universities are working to modernize their campuses, and speed-tracking students through the system is dangerous for their budgets that are reliant on making the modernizations happen. With enrollment cliffs on the horizon and lower trust in high school students in higher education, the answer isn't to cut corners and do more damage to institutions. This puts a band-aid when the issue requires a different type of treatment. CT lawmakers already shot this idea down. Rhode Island schools piloting this did see increased enrollment in programs, but it's too early to tell what the end results are. The social class elite view college as an opportunity for networking and the experience, and this track method encourages students to get in and get out without focusing on development. So many jobs are still reliant on employers knowing the person and liking them, and this 90-credit method encourages students to skip formative experiences like internships and co-ops that can help secure them jobs in this market. It's a false promise. It'll also impact their ability to do deeper research, limit connections with faculty who can serve as reference when students want to pursue additional and higher degrees, and limit time spent in laboratories. Do you want a nurse who learned their practice by cutting corners? Cut this proposal and find other ways to encourage enrollment and keep costs low to our students. "	Please see response to Comment #85.
Betsy Miller, Salem, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Shortchanging students is the WRONG answer to the issue of affordability. "	The general opposition expressed in the comment is noted.

Hy Ginsberg, Worcester State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Massachusetts has a reputation for high quality education; this would destroy that. We are already seeing some of the least prepared students ever entering our universities; they need *more* education, not watered down degrees."	Please see response to Comment #85.
Jennifer McGrath, West Springfield, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "There are many reasons why awarding a bachelor's degree for a 4-year program, in 3 years instead, is a bad idea. The answer to the college affordability crisis is to address costs and restore adequate state funding, not to give students less education and call it access. As a high school teacher, we don't decrease the rigor or content in our classrooms if students are struggling - we help them to build strategies for success. Awarding a degree within 3 years is reducing the rigor of that program and ensuring that college graduates with 3 year degrees are passed over by future employers. Decreasing the value of a college degree is not the answer. "	Please see response to Comment #85.
Nancy Herman-Centers, Brockton, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I work with freshman, first generation, multilingual learners as a faculty member teaching First Year Writing courses. This is a terrible plan for the students I serve both at BSU and Massasoit CC who would transfer to any of the 4 year colleges in the Commonwealth."	Please see response to Comment #85.
Carolyn Villanova, Pittsfield, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I am a retired teacher. "	The general opposition expressed in the comment is noted.
Matt Greene, Bridgewater State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "College is more than training for a job. Students should take more courses to become well-rounded, empathetic people. "	The general opposition expressed in the comment is noted.

Jo Ann Florek, Westfield, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Tailoring a 4 year degree with collaboration among public school placements, high need areas of education and supporting developing expertise with more practicum experience makes more sense than cutting out a year! Perhaps the colleges could charge less for credits for these opportunities since students are off campus for these practicums."	Please see response to Comment #85.
Sandra Rothenberg, Framingham State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This is detrimental for students and everyone and everything at Massachusetts State Universities."	The general opposition expressed in the comment is noted.
Stephanie Cardon, Massachusetts College of Art & Design	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This is a race to the bottom. We are already undereducating compared to other countries. "	The general opposition expressed in the comment is noted.
Kerry Costello, Boston, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Do Not water down our Degree requirements! We can do better than that!!!!!!!!!"	Please see response to Comment #85.
Diana Fox, Bridgewater State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I strongly oppose any 90 credit degree. Students will be deprived of the deeper learning that builds mastery in a subject laying the foundation for expertise and undermining opportunities for graduate school. They will not be prepared or exposed to high impact practices, the skills of advanced research and writing. This turns higher education into a degree only suitable for entry level work. "	Please see response to Comment #85.
Stephen Russell, Pepperell, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "I urge you to reconsider the proposals for 3 year degrees. Four years is barely enough to foster the citizens we need to maintain our democracy. Early college is providing the affordability that the 3 year degree program proposes. "	Please see response to Comment #85.

Heather Reed, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Thirty credits, the difference between 120 and 90, is the equivalent of ten classes. This can be the difference in learning to think critically about governance, privilege, economic vitality, world order, and how empathy can be a super power. Also, validating the credibility of 90 credit Bachelor's degree is like validating the distrust in higher education. The value of higher education is being questioned because we don't fund public education anymore. None of us want to run a college like a business or treat students like customers. We want something better we want opportunity for financial security and the pursuit of knowledge, informed solutions, and an empowered sense of self for all. Not shortcuts."	Please see response to Comment #85.
Carole Bott, Framingham, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "As a retired teacher who was also an adjunct professor, please do not sacrifice the intellectual integrity of a college education. Thank you. "	Please see response to Comment #85.
Jennifer Sherman, Hingham, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "Do not water down degrees!!! College educated people (with standard 60/120 credits Associate/Bachelor) are what makes Massachusetts the productive, meaningful state it is!!! Do you really want to decline?"	Please see response to Comment #85.
Ivana George, Bridgewater State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "This will weaken the quality of education that the students receive. It will impact the poorest students the most, putting them further behind their peers. Don't support this bad idea of 90 credit degrees. Instead support funding to make a 120 credit degree affordable for the citizens of the commonwealth by restoring adequate state funding to higher education."	Please see response to Comment #85.

Margarita Perez, Worcester State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #85) - "As a 25 + year faculty member in the state College/University system I oppose this measure We are at a time when students are entering university with fewer literacy skills and less developed critical thinking abilities. This measure will only erode the quality of the college degree."	Please see response to Comment #85.
Jeff Warmouth, Professor & Chair of Communications Media Department, Fitchburg State University	Strongly opposed to 90 credit bachelor's degrees. Argues that these degrees weaken the value of a bachelor's degree by reducing exposure to liberal arts and sciences disciplines, such as writing, history, philosophy, mathematics, and the natural and social sciences. Contends that approving such degrees would undermine the quality of higher education in Massachusetts.	The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. This approach is intended to ensure that students remain competitive across a range of post-completion

<p>Caroline Stanley, Professor of Psychology, Bridgewater State University</p>	<p>Strongly opposed to Merrimack's proposal to offer a 96-credit applied bachelor of arts in Psychology. Argues that the proposed program lacks academic rigor and fails to adequately prepare students for careers or graduate study. Notes that the curriculum omits core courses in psychology, such as Statistics and Research Methods, which makes students unlikely to qualify for reputable graduate programs and fails to meet one of the main learning goals established by the American Psychological Association (APA) for undergraduate majors: to teach scientific inquiry and critical thinking skills. Raises concerns about the program's limited upper-level coursework, lack of research opportunities, and requirements that students complete four internships, which is untenable given the scarcity of high-quality placements. Identifies that the proposal references two experimental psychology courses, but does not provide sufficient information about them.</p>	<p>The proposed program features rigorous coursework across diverse areas of psychology, preparing students for a wide variety of career pathways (human resources, counseling, social work, applied behavioral analysis, I/O, marketing, children's advocacy, sports psychologist) while also positioning them competitively for graduate study (clinical and mental health counseling, social work, and school counseling). Further, the learning outcomes noted (statistical and methodological skills, theoretical analysis and critical thinking skills) are addressed in a number of courses in the proposed curriculum. With an emphasis on experiential learning, students complete four semesters of scaffolded internships, providing an exceptional</p>
<p>Zachary Lee, Film & Video Coordinator, Fitchburg State University</p>	<p>Strongly opposed to both reduced credit bachelor proposals. Argues that the proposal responds to the cost of education but ignores the actual value proposition of higher education. Contends that many students already arrive underprepared and need more time, not less. Argues that both proposals focus on speeding up degree completion without demonstrating meaningful educational value, and only prepare students for further study at Merrimack and Suffolk only.</p>	<p>We agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating these pilots we do not intend lower standards or create a two-tiered system of higher education, but seek to modernize pathways to ensure they remain rigorous, relevant, and responsive to the needs of today's students and the economy. It should also be emphasized that, as part of its review, the Board and the Department expect pilot proposals to give careful consideration to labor market demands and, where appropriate, to prerequisites for graduate and professional education. This approach is intended to ensure that students remain competitive across a range of post-completion pathways. Additionally, all pilot</p>

Mohammad Salmassi, Professor of Mathematics, Framingham State University

Strongly opposed - Argues that Merrimack's proposed programs lack the rigor of traditional bachelor's degrees. Contends that Merrimack's claim that these degrees meet the "same general education requirements" as its traditional 124-credit programs only because Merrimack revised its general education and eliminated requirements such as philosophy, ethics, foreign language, historical studies, a dedicated writing course, a second social science course, and experiential learning requirements. Argues that this new structure allows major courses to double-count toward general education requirements, resulting in a narrower foundation rather than an equivalent degree with fewer credits. Concludes that student need more exposure to liberal arts, writing, and critical thinking, not less.

The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted for consideration to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. This approach is intended to ensure that students remain competitive across a range of post-completion pathways

Marilena Hall, Professor of Chemistry,
Stonehill College

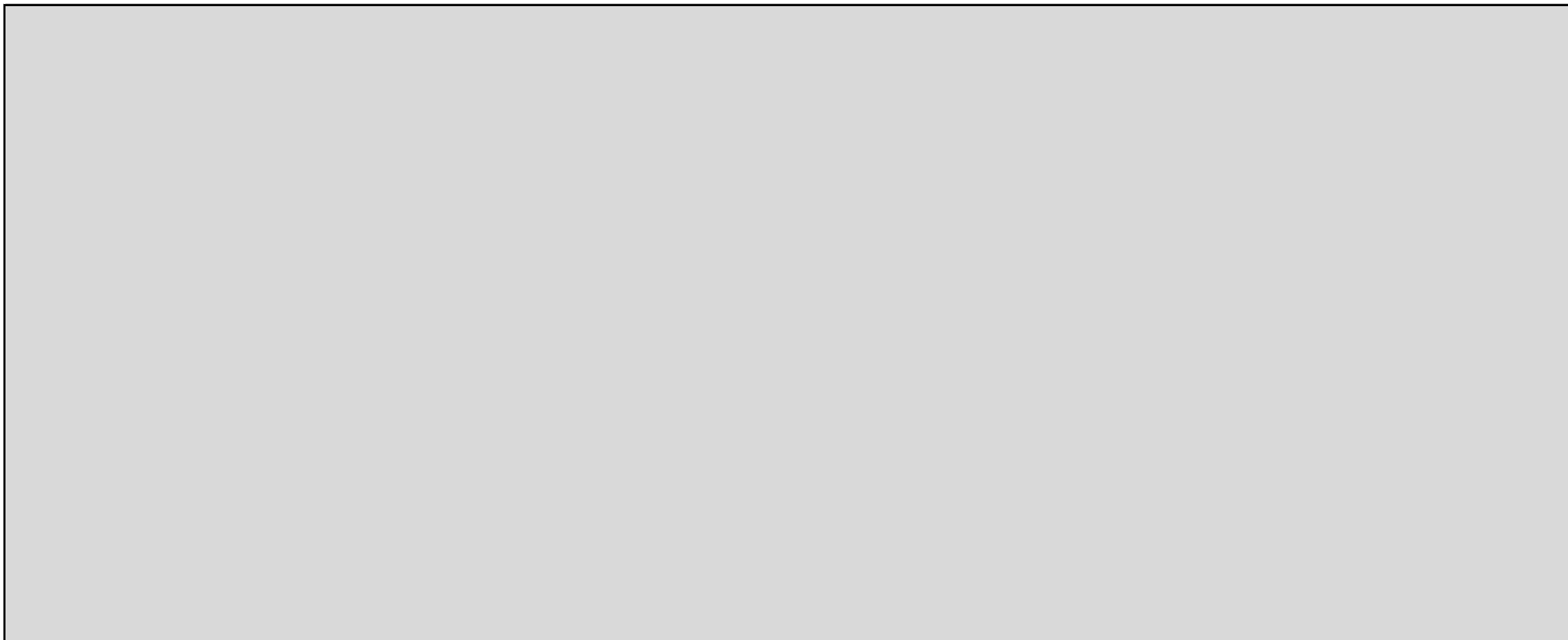
Opposes reducing credit requirements for bachelor's degrees. Argues that students need broader educational experiences beyond their majors to become well-rounded, lifelong learners. Contends that reduced credit degrees cannot provide the same depth or value as a traditional bachelor's degree, and that any short-term savings in time or cost shouldn't come at the expense of academic quality.

Reduced-credit pilot programs submitted for review by the Board are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. While they may differ in curricular design, they should not differ in the rigor or scope of what students are expected to know and be able to do. We expect pilot programs to be developed with careful attention to labor market demand and, where relevant, to prerequisites for graduate and professional education, ensuring that students remain competitive across a range of post-completion pathways. In alignment with the Board's commitment to socioeconomic mobility, we also recognize that the inclusion of high-impact practices—such as project-based learning, internships, and employer-aligned experiences—can deepen critical thinking and problem-solving in ways that complement, and in some cases enhance, traditional classroom-based approaches. The Innovation Regulation enables institutions to explore these approaches in a structured and controlled manner, supporting the

DeMisty Bellinger-Delfeld, Professor of English, Fitchburg State University

Strongly opposed to both reduced credit bachelor proposals. Argues that they would weaken academic rigor at a time when many students already enter college with declining reading, writing, math, and critical-thinking skills. Contends that reducing general education requirements in humanities, sciences, and mathematics would deprive students of essential learning opportunities and may disproportionately harm first-generation and marginalized students. Further argues that higher education should develop thoughtful, well-rounded citizens, not merely prepare workers for employment.

The Board remains committed to equity and its responsibility to ensure access to high-quality postsecondary opportunities for all students. It further recognizes that, for many students—particularly working adults and those balancing family responsibilities—time to degree remains a significant barrier to completing college. In evaluating the proposed pilots, the Board will apply these guiding principles alongside its commitment to consumer protection when making approval determinations. Pilot programs submitted to the Board are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. As part of its review, the Board and the Department expect proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. Additionally, we expect pilot programs to be developed with close attention to labor market demand, ensuring alignment between academic preparation and workforce needs. In keeping with the Board’s commitment to socioeconomic mobility, we also



Cara Berg Powers

Strongly opposed to both reduced credit bachelor proposals. Argues that reduced-credit degrees would create a two-tiered system in which disadvantaged students receive an inferior educational experience. Contends that the value of higher education extends beyond career preparation.

We agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating pilots we do not intend to lower standards or create a tiered system of higher education, but seek to modernize pathways so they remain rigorous, relevant, and responsive to the needs of today's students and the economy. As part of the review process, the Board and the Department expect pilot proposals to consider labor market demand and, where appropriate, to prerequisites for graduate and professional education. This approach is designed to ensure that students remain competitive across a range of post-completion pathways. All pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The

Karen Duseau, Associate Professor,
Bridgewater State University

Strongly opposed to both reduced credit bachelor proposals. Argues that reduced-credit bachelors degrees threaten the quality and accessibility of the Commonwealth's higher education system. Contends that a traditional bachelor's degree promotes critical thinking, interdisciplinary learning, and social mobility, and warns that approving reduced credit degrees could create a competitive pressure for other institutions to lower standards, leading to a gradual erosion of educational quality across the state.

The pilot framework is designed to ensure that any new model is tested carefully, evaluated rigorously, and advanced only if it demonstrably serves students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards. Pilot programs submitted to the BHE are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. As part of its review, the Board and the Department also expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach helps ensure that students remain competitive across a range of post-completion pathways. Furthermore, we expect pilot programs to be developed with careful attention to labor market demand. In alignment with the Board's commitment to socioeconomic mobility, we further recognize that the inclusion of high-impact practices—such as project-based learning, internships, and employer-aligned

<p>Vincent Pedone Executive Director State Universities Council of Presidents (on behalf of State University Presidents)</p>	<p>The Massachusetts State Universities Council of Presidents urges the Board of Higher Education to defer approval of Merrimack College's and Suffolk University's proposed sub-120-credit bachelor's degree programs until more evidence is available. The presidents argue that reduced-credit bachelor's degrees could create a two-tiered system of higher education that disproportionately limits educational opportunities for low-income and first-generation students while undermining the traditional value of a bachelor's degree. They contend there is insufficient evidence that employers, students, or policymakers have identified a need for these programs and note that Massachusetts already offers affordable and accelerated pathways to traditional 120-credit degrees. The letter also raises concerns about the proposed degree titles, uncertainty regarding graduate school acceptance, and the lack of independent analyses demonstrating workforce demand or successful outcomes in other states. The presidents conclude that any departure from the 120-credit bachelor's degree standard should be supported by compelling evidence to protect students, maintain academic quality, and preserve Massachusetts' national reputation for excellence in higher education. an inferior educational experience. Contends that the value of higher education extends beyond career preparation.</p>	<p>Please refer to Comment #2 concerning student risk. Further, we agree that Massachusetts must continue to uphold the highest standards in higher education. In advancing and evaluating pilots we do not intended to lower standards or create a tiered system of higher education, but seek to modernize pathways so they remain rigorous, relevant, and responsive to the needs of today's students and the economy. As part of the review process, the Board and the Department expect pilot proposals to consider labor market demand and, where appropriate, to prerequisites for graduate and professional education. This approach is designed to ensure that students remain competitive across a range of post-completion pathways. All pilot programs are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. The distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do.</p>
--	---	--