

**BOARD OF HIGHER EDUCATION
REQUEST FOR BOARD ACTION**

NO.: BHE 26-68

BOARD DATE: June 26, 2026

APPLICATION OF SUFFOLK UNIVERSITY SUBMITTED PURSUANT TO 610 CMR 16.00 TO AWARD THE FOLLOWING 94-CREDIT APPLIED BACCALAUREATE DEGREE PILOT PROGRAM: APPLIED BACHELOR OF SCIENCE IN HEALTHCARE ADMINISTRATION AND INNOVATION

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 **Suffolk University** to offer and award a 94-credit Applied Bachelor of Science in Healthcare Administration and Innovation.

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 program 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
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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: Massachusetts General Laws Chapter 15A, Section 9(b); AAC 18-40

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

**BOARD OF HIGHER EDUCATION
2026
Suffolk University
Innovation Pilot Application
Applied Bachelor of Science in Healthcare Administration and Innovation**

BACKGROUND

Suffolk University is requesting authorization to offer on a pilot basis one 94-credit applied baccalaureate degree program: Applied Bachelor of Science in Health Care Administration and Innovation, pursuant to the Board of Higher Education’s Degree Granting Regulations for Pilot Proposals on Innovation, 610 CMR 16.00.

Suffolk University is a New England Commission of Higher Education (NECHE) accredited independent institution located in Boston, Massachusetts. Suffolk University was legislatively chartered pursuant to the Acts of 1914, Chapter 145 of the Massachusetts General Law and authorized “to award all earned and honorary degrees as are usually awarded by college and universities in this Commonwealth, except medical and dental degrees.”

PROPOSAL DEVELOPMENT AND EVALUATION

Following the Massachusetts Board of Higher Education promulgation of the Degree Granting Regulations for Pilot Proposals on Innovation (610 CMR 16.00) on February 10, 2026, Suffolk submitted an innovation pilot proposal to offer a 3-year, 94-credit bachelor’s degree program in Healthcare Administration and Innovation on March 2, 2026. After reviewing the minimum eligibility criteria in 610 CMR 16.04, staff determined that the institution met the criteria and considered them to be an eligible institution. The institution also submitted their proposal to their accreditor, the New England Commission of Higher Education (NECHE), and staff determined that an external review process conducted by NECHE would be accepted 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. NECHE approved Suffolk's Innovation Proposal on April 23, 2026 and notified staff of the approval.

Staff accepted and reviewed Suffolk University's innovation pilot proposal consistent with the procedures and criteria set forth in 610 CMR 16.00. DHE staff reviewed the University'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 Suffolk 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). An initial meeting with staff and the institution occurred on April 28, 2026 to review the process (timeline, requirements, regulations).

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. After reviewing the innovation pilot proposal, staff met with the institution on May 11, 2026 to provide feedback based on the regulations. In particular, staff noted concerns that the core curriculum was currently under institutional review, potential internal and external transfer credit loss, learning outcomes equivalence in the proposed degree program compared with a traditional pilot degree program, and possible financial aid eligibility issues for those students completing the proposed pilot degree program. Staff requested additional information per 610 CMR 16.06 and 16.07 on regional and/or statewide labor market data, further requesting that that institution provide evidence to support market need and market research, including references to workforce development plans (e.g., MassHire Regional Blueprints). Staff also requested information per 610 CMR 16.06 and 16.07 concerning articulation with pre-matriculation experiences and credit accumulation such as dual enrollment, Early College, AP course and credits, and the like. Some large categories of credit and credit-worthy experience were not referenced in the innovation pilot proposal, such as credit for certain military experiences, credit by examination other than Advanced Placement, prior learning assessment, and the like. Staff also requested clarification about whether internships are paid or unpaid. Finally, staff requested clarification concerning securing students' informed consent, as the formal disclosure statement included in the innovation pilot proposal did not mention whether a student's signature is required. Staff followed up this meeting with a written summary of the feedback on May 13, 2026. On May 20, 2026, the institution provided 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

Suffolk's stated intent of its innovation pilot proposal is a purposefully designed reduced-credit degree that seeks to maintain rigorous academic standards and learning outcomes comparable to Suffolk's existing Bachelor of Science in Business Administration (BSBA). Through the proposed degree program, the institution intends to expand access to high-quality undergraduate education for students who face financial or time barriers, and to respond to demonstrated workforce demand for skilled healthcare administrators. The innovation pilot proposal also seeks to address concerns around the increasing cost of higher education and the burden of student loan debt, and a perceived decline in public confidence in the value of a bachelor's degree. The institution notes that these concerns have made it imperative for universities to offer more flexible and affordable educational pathways. In terms of Suffolk's student demographic, a recent review of student withdrawal forms reveals that 25% of students cite financial reasons for withdrawal and 45% cite personal reasons (internal Suffolk data). Suffolk proposes that a 94-credit degree program can help address these challenges by providing a faster route to graduation and reducing student debt.

INSTITUTIONAL CONTEXT AND MARKET RATIONALE

A growing number of New England institutions are developing or launching reduced-credit baccalaureate programs. Suffolk's specific innovation pilot proposal seeks to leverage their location in the heart of the Commonwealth's healthcare ecosystem. Suffolk draws approximately two-thirds of its undergraduate students from Massachusetts, and 60% of those graduates remain in the greater Boston area for employment or further study, making this program a direct investment in the Massachusetts healthcare management pipeline.

Suffolk asserts that growing employer demand for skills-aligned, workforce-ready graduates is validated by national surveys, federal policy, and healthcare industry feedback. This supports a rigorous curriculum designed around demonstrated competencies rather than credit

accumulation, positioning graduates to enter a high-demand field a year sooner, without sacrificing educational quality. The Bureau of Labor Statistics projects Medical and Health Services Managers (SOC 11-9111) will be among the eight fastest-growing occupations requiring a bachelor's degree in the country. Massachusetts is one of the most concentrated markets in the country for healthcare management professionals, employing more than 17,000 medical and health services managers. Massachusetts state-level projections show this administrative occupation growing 30% between 2022 and 2032. Suffolk's recent Master's in Healthcare Administration program re-design yielded insights related to what employers need given the current industry climate. The revision was informed by 16 semi-structured employer and alumni interviews and 33 survey responses from largely local participants. Aspects from the data that are relevant to the undergraduate program include the curriculum's emphasis on data analytics, AI, operational improvement, health equity, and leadership.

Suffolk's PILOT (Pioneering Innovations in Learning Outcomes and Teaching) initiative, established under the University's Suffolk Forward Strategic Plan, provided the governance framework for this innovation pilot proposal.

PROGRAM OF STUDY AND CREDIT BREAKDOWN

The proposed Applied Bachelor of Science in Healthcare Administration and Innovation is a structured, three-year degree program totaling 94 credits. The curriculum is jointly developed across three of Suffolk's schools—the College of Arts & Sciences (CAS), Sawyer Business School (SBS), and Law School—and integrates general education, business fundamentals, and healthcare-specific coursework. Students in the proposed degree program will fulfill all learning outcomes required of the Bachelor of Science in Business Administration (BSBA) core curriculum, with targeted course substitutions in a small number of areas.

Credit Breakdown

The shared general education component (30 credits) includes coursework in writing, mathematics and statistics, social/cultural/global perspectives, science/technology/engineering, and creativity and innovation, consistent with requirements for all Suffolk undergraduates. The business core (30 credits) provides a foundation in economics, accounting, management, finance, operations, information systems, ethics, and strategy, meeting BSBA learning outcomes. The 25-credit healthcare facet of the major integrates existing and newly developed courses in healthcare systems, operations, quality, law and policy, and innovative care models, culminating in a required internship and capstone course. The students will have the option to take one free elective course per year (9 credits total).

Internship Requirement

All students are required to complete HLTH-300: Healthcare Administration Internship, a 3-credit course requiring a minimum of 120 supervised hours in an approved healthcare setting. Placements span hospitals, community health centers, public health departments, behavioral health organizations, healthcare consulting firms, and biotech startups, among others. Students have flexibility to complete the internship any time after their first year. They are anticipated to be paid internships. Students who are unable to secure a paid internship experience may be advised to leverage Suffolk's Summer Career Development Stipend, which provides a \$3500 stipend for qualifying experiences.

Program Learning Objectives and Outcomes

Program Learning Objectives: Graduates of the proposed degree program will demonstrate mastery across six integrated competency areas:

- Understand the Structure and Dynamics of the U.S. Healthcare System: Students will be able to compare the foundations of U.S. healthcare organization, financing, and delivery to international systems.
- Apply Interdisciplinary Knowledge to Healthcare Challenges: Students will integrate concepts from healthcare management, sociology, operations, policy, and ethics to develop innovative solutions addressing access, quality, and equity.
- Drive Operational and Systems Improvement: Using performance improvement methods (including Lean and Six Sigma), data analytics, and emerging technologies such as AI, students will make recommendations to transform service delivery and healthcare operations.
- Navigate Legal, Regulatory, and Policy Environments: Students will apply legal and compliance frameworks—including HIPAA, fraud and abuse statutes, and informed consent—to ensure ethical and accountable healthcare practice.
- Advance Patient-Centered and Equitable Care Models: Students will apply the Quintuple Aim framework to co-create care models that advance equity and health outcomes across diverse populations.
- Communicate, Collaborate, and Lead for Impact: Students will demonstrate strong communication, teamwork, and leadership through interdisciplinary projects that produce measurable impact for healthcare partners.

Program Learning Outcomes: By the end of the proposed degree program, students will be able to:

1. Describe and compare healthcare systems and delivery models in the U.S. and globally, with attention to structure, outcomes, and opportunities for innovation.
2. Analyze healthcare challenges using data, systems thinking, and improvement tools to identify inefficiencies and develop solutions that enhance performance and patient outcomes.
3. Apply operational and technological innovations (such as Lean, Six Sigma, AI, and care redesign) to improve patient flow, resource use, and clinical decision-making.

4. Evaluate and design care models that address health inequities and social determinants of health, and propose novel, sustainable approaches aligned with the Quintuple Aim.
5. Interpret and apply regulatory frameworks to ensure compliance while supporting innovative practices in healthcare organizations, research, and community settings.
6. Lead consulting or applied projects with healthcare partners, generating actionable, evidence-based recommendations through interdisciplinary teamwork and stakeholder engagement.

ASSESSMENT PLAN

Suffolk University asserts it is committed to ensuring educational effectiveness that is comparable to its traditional 120-credit programs.

Internship and Capstone Assessment

The required internship is assessed through three instruments: (1) a supervisor evaluation using the Suitable/ National Association of Colleges and Employers Career Readiness Competency framework; (2) a student self-evaluation aligned to the same competencies; and (3) a post-internship reflection essay in which students connect academic learning to real-world practice. The capstone course (HLTH-401) is assessed through formal presentations to healthcare partner organizations and a written consulting report evaluated against a faculty rubric aligned to program learning outcomes.

Program-Level Assessment Benchmarks

The Advisory Board will meet each semester to review the following key performance indicators:

- Retention and Persistence: First-to-second year retention within 5 percentage points of the University average for traditional undergraduates (currently 78%).

- Graduation Rates: Three-year graduation rates within 5 percentage points of the four-year graduation rate for traditional undergraduates; four-year rates within 5 percentage points of the six-year traditional rate.
- Internship Success: 100% of eligible students placed in approved internships; at least 90% receiving satisfactory or higher supervisor evaluations.
- Post-Graduate Outcomes: At least 80% of graduates employed full-time, enrolled in graduate school, or participating in a service program within six months of graduation.
- Student Satisfaction: Exit survey satisfaction rate of 85% or higher regarding academic quality, advising, and career preparation.
- Federal Earnings Benchmark: Graduate median earnings at 2 and 4 years post-enrollment meet or exceed the federal minimum earnings threshold under the U.S. Department of Education's financial value transparency framework as measured through the College Scorecard or successor federal reporting tool.

Assessment will also include curriculum mapping reviews, comparison of traditional and program cohort performance in general education outcomes, employer testimonials, alumni outcome surveys, and eventual integration into Suffolk's Periodic Academic Program Review process.

Transparency and Consumer Protections

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). Suffolk 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 degrees, 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.

NECHE requires the disclosure language above to appear in all marketing, admissions, and advising materials. In addition, students in the proposed degree program will be required to affirm, either electronically or in writing, that they understand this is not a traditional program when they are enrolling and declaring the major. These materials will address the following points:

- The norm for a bachelor's degree remains four years and 120 credits; some employers and graduate programs may not consider this program to be the equivalent to a traditional 120-credit program. 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).
- The program is best suited for students with defined career goals and a commitment to entering healthcare administration. Providing this information helps prospective students identify potential limitations and support informed-decision making by prospective students, consistent with the student-risk and informed consent requirements in 610 CMR 16.06(1)(d), 16.07(8), and 16.07(11).
- The program is eligible for Title IV federal financial aid; however, students who return to pursue additional undergraduate credits post-graduation 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).

- Students may transition to a traditional 124-credit BSBA at any time, including post-graduation, with all prior Suffolk coursework applied toward Suffolk's residency requirements.

Institutional Resources and Cost

Suffolk asserts that it has sufficient administrative, financial, human, physical and technological resources to implement and sustain the proposed degree program. The institution modeled two enrollment scenarios: a smaller cohort (10-20 students per year) and a steady cohort of 30 students per year. Each student will generate less total tuition revenue than a traditional four-year student simply by virtue of completing 26 fewer credits. Based on the financial projections, Suffolk projects that students completing a 94-credit program will incur approximately 75 percent of the tuition and fee costs associated with a comparable four year, 120 credit bachelor's degree program and will save approximately one year of tuition, fees, room and board, and related educational expenses by completing a degree in three years rather than four. Although a three-year program generates less revenue than a traditional four-year model, it can be financially viable if it attracts new students who would not otherwise enroll. Cost savings from reduced support services and advising are modest due to fixed institutional expenses. The proposed degree program's success depends on expanding the student pool, differentiating the institution in the marketplace, and meeting modest additional resource needs, including new courses, enhanced advising, updated student information systems, and clear marketing. Appendix G in **Attachment A** provides detailed financial projections and spreadsheets supporting these analyses.

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 no comments suggested specific revisions or enhancements to the Suffolk 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 spreadsheet which identifies and summarizes all public comments received is attached as **Attachment C**.

Based on a review of all materials submitted by the institution 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 submit to any necessary periodic inspections, the conditions require the institution to undergo an external review organized and conducted, with Department participation, by NECHE, and 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 program. 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 Suffolk University to award the proposed degree program 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 Suffolk University to award this degree in accordance with the conditions set forth in the motion language.

Suffolk University

Pilot Proposal Under 610 CMR 16.00: Degree Granting Regulations for Pilot Proposals on Innovation

Applied Bachelor's Degree in Healthcare Administration and Innovation

94-Credit Baccalaureate Degree Program

Submitted to the Massachusetts Board of Higher Education | May 2026

Executive Summary

Overview and Purpose

Suffolk University proposes an Applied Bachelor's Degree in Healthcare Administration and Innovation, a 94-credit pilot baccalaureate program submitted to the Massachusetts Board of Higher Education (BHE) under 610 CMR 16.00, the Degree Granting Regulations for Pilot Proposals on Innovation. This proposal requests a waiver of the Massachusetts 120-credit minimum for baccalaureate degrees.

This program is not an accelerated format that compresses traditional coursework into fewer semesters. Rather, it is a purposefully designed reduced-credit degree that maintains rigorous academic standards and learning outcomes comparable to Suffolk's existing Bachelor of Science in Business Administration (BSBA). It is designed to expand access to high-quality undergraduate education for students who face financial or time barriers, and to respond to demonstrated workforce demand for skilled healthcare administrators.

Suffolk University is a 120-year-old private, nonprofit institution continuously accredited by the New England Commission of Higher Education (NECHE) without sanction or public notation. The University meets all the eligibility criteria under BHE's pilot proposal regulations: sustained Massachusetts presence and accreditation; consistent governance under the same Board of Trustees; and no active investigations by the Commonwealth, federal government, or relevant oversight bodies.

Institutional Context and Market Rationale

A growing number of New England institutions are developing or launching reduced-credit baccalaureate programs. Suffolk's specific proposal seeks to leverage our location in the heart of the Commonwealth's healthcare ecosystem. Suffolk draws approximately two-thirds of its undergraduate students from Massachusetts, and 60% of those graduates remain in the greater Boston area for employment or further study, making this program a direct investment in the Massachusetts healthcare management pipeline.

Growing employer demand for skills-aligned, workforce-ready graduates is validated by national surveys, federal policy, and healthcare industry feedback. This supports a rigorous curriculum designed around demonstrated competencies rather than credit accumulation, positioning graduates to enter a high-demand field a year sooner, without sacrificing educational quality. The Bureau of Labor Statistics projects Medical and Health Services Managers (SOC 11-9111) will be among the eight fastest-growing occupations requiring a bachelor's degree in the

country. Massachusetts is one of the most concentrated markets in the country for healthcare management professionals, employing more than 17,000 medical and health services managers. Massachusetts state-level projections show this administrative occupation growing 30% between 2022 and 2032. Suffolk's recent Master's in Healthcare Administration program re-design yielded insights related to what employers need given the current industry climate. The revision was informed by 16 semi-structured employer and alumni interviews and 33 survey responses from largely local participants. Aspects from the data that are relevant to the undergraduate program include the curriculum's emphasis on data analytics, AI, operational improvement, health equity, and leadership.

Suffolk's PILOT (Pioneering Innovations in Learning Outcomes and Teaching) initiative, established under the University's Suffolk Forward Strategic Plan, provided the governance framework for this proposal.

Program of Study and Credit Breakdown

The Applied Bachelor's in Healthcare Administration and Innovation is a structured, three-year degree program totaling 94 credits. The curriculum is jointly developed across three of Suffolk's schools—the College of Arts & Sciences (CAS), Sawyer Business School (SBS), and Law School—and integrates general education, business fundamentals, and healthcare-specific coursework. Students in this program will fulfill all learning outcomes required of the Bachelor of Science in Business Administration (BSBA) core curriculum, with targeted course substitutions in a small number of areas.

Credit Breakdown

The shared general education component (30 credits) includes coursework in writing, mathematics and statistics, social/cultural/global perspectives, science/technology/engineering, and creativity and innovation, consistent with requirements for all Suffolk undergraduates. The business core (30 credits) provides a foundation in economics, accounting, management, finance, operations, information systems, ethics, and strategy, meeting BSBA learning outcomes. The 25-credit major integrates existing and newly developed courses in healthcare systems, operations, quality, law and policy, and innovative care models, culminating in a required internship and capstone course. The students will have the option to take one free elective course per year (9 credits).

Internship Requirement

All students are required to complete HLTH-300: Healthcare Administration Internship, a 3-credit course requiring a minimum of 120 supervised hours in an approved healthcare setting. Placements span hospitals, community health centers, public health departments, behavioral health organizations, healthcare consulting firms, and biotech startups, among others. Students have flexibility to complete the internship any time after their first year. We anticipate these to be paid internships. Students who are unable to secure a paid internship experience may be advised to leverage Suffolk's Summer Career Development Stipend, which provides a \$3500 stipend for qualifying experiences.

Program Learning Outcomes

Graduates of the Applied Bachelor's in Healthcare Administration and Innovation will demonstrate mastery across six integrated competency areas:

1. **Understand the Structure and Dynamics of the U.S. Healthcare System:** Students will be able to compare the foundations of US healthcare organization, financing, and delivery to international systems.
2. **Apply Interdisciplinary Knowledge to Healthcare Challenges:** Students will integrate concepts from healthcare management, sociology, operations, policy, and ethics to develop innovative solutions addressing access, quality, and equity.
3. **Drive Operational and Systems Improvement:** Using performance improvement methods (including Lean and Six Sigma), data analytics, and emerging technologies such as AI, students will make recommendations to transform service delivery and healthcare operations.
4. **Navigate Legal, Regulatory, and Policy Environments:** Students will apply legal and compliance frameworks—including HIPAA, fraud and abuse statutes, and informed consent—to ensure ethical and accountable healthcare practice.
5. **Advance Patient-Centered and Equitable Care Models:** Students will apply the Quintuple Aim framework to co-create care models that advance equity and health outcomes across diverse populations.
6. **Communicate, Collaborate, and Lead for Impact:** Students will demonstrate strong communication, teamwork, and leadership through interdisciplinary projects that produce measurable impact for healthcare partners.

Assessment Plan

Suffolk University is committed to ensuring educational effectiveness that is comparable to its traditional 120-credit programs.

Internship and Capstone Assessment

The required internship is assessed through three instruments: (1) a supervisor evaluation using the Suitable/NACE Career Readiness Competency framework; (2) a student self-evaluation aligned to the same competencies; and (3) a post-internship reflection essay in which students connect academic learning to real-world practice. The capstone course (HLTH-401) is assessed through formal presentations to healthcare partner organizations and a written consulting report evaluated against a faculty rubric aligned to program learning outcomes.

Program-Level Assessment Benchmarks

The Advisory Board will meet each semester to review the following key performance indicators:

7. **Retention and Persistence:** First-to-second year retention within 5 percentage points of the University average for traditional undergraduates (currently 78%).
8. **Graduation Rates:** Three-year graduation rates within 5 percentage points of the four-year graduation rate for traditional undergraduates; four-year rates within 5 percentage points of the six-year traditional rate.
9. **Internship Success:** 100% of eligible students placed in approved internships; at least 90% receiving satisfactory or higher supervisor evaluations.
10. **Post-Graduate Outcomes:** At least 80% of graduates employed full-time, enrolled in graduate school, or participating in a service program within six months of graduation.
11. **Student Satisfaction:** Exit survey satisfaction rate of 85% or higher regarding academic quality, advising, and career preparation.
12. **Federal Earnings Benchmark:** Graduate median earnings at 2 and 4 years post-enrollment meet or exceed the federal minimum earnings threshold under the

Department of Education's financial value transparency framework as measured through the College Scorecard or successor federal reporting tool.

Assessment will also include curriculum mapping reviews, comparison of traditional and program cohort performance in general education outcomes, employer testimonials, alumni outcome surveys, and eventual integration into Suffolk's Periodic Academic Program Review process.

Transparency and Consumer Protections

Suffolk will adopt the "Applied Bachelor's" degree title to clearly distinguish this credential from traditional 120-credit baccalaureate degrees, consistent with NECHE guidance. In addition to the formal Disclosure Statement required by NECHE that will appear in all marketing, admissions, and advising materials, students will be asked to affirm, either electronically or in writing, that they understand this is not a traditional program when declaring the major. These materials will address the following points:

13. The norm for a bachelor's degree remains four years and 120 credits; some employers and graduate programs may not consider this program to be the equivalent to a traditional 120-credit program.
14. The program is best suited for students with defined career goals and a commitment to entering healthcare administration.
15. The program is eligible for Title IV federal financial aid; however, students who return to pursue additional undergraduate credits post-graduation may face restricted federal aid eligibility.
16. Students may transition to a traditional 124-credit BSBA at any time, including post-graduation, with all prior Suffolk coursework applied toward Suffolk's residency requirements.

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Standard 1: Mission and Purposes

Many states and institutions are exploring or implementing 90-credit baccalaureate degrees to address workforce shortages and meet the needs of non-traditional students.^{1,2} Given these trends and Suffolk's mission of access and opportunity, we believe there is a strong alignment between our mission and the proposed 94-credit offering as well as a strong likelihood that there will be sufficient new demand to make the degree financially sustainable.

Institutional History, Eligibility, and Current Context

Suffolk University is a 120-year-old private, non-profit institution. [Initially founded as a law school by Gleason Archer](#) in 1906, Suffolk's fundamental mission has been to combine access to education with excellence while serving those who have historically been denied educational opportunity by virtue of social class, culture, nationality, religion, or income. The University continues to be guided by what Gleason Archer called "the gospel of self-help and hard work." Much has changed since 1906, but providing access and opportunity continues to drive the work we do. [Our current mission statement](#) was approved by the Board of Trustees on February 9, 2019, and reads as follows:

At Suffolk University we are driven by the power of education, inclusion, and engagement to change lives and positively impact communities. Committed to excellence, we provide students with experiential and transformational learning opportunities that begin in the center of Boston, reach across the globe, and lead to extraordinary outcomes for our graduates.

Suffolk University has been continuously accredited by the New England Commission of Higher Education (NECHE) without sanction or public notation. The University meets all the eligibility criteria under BHE's pilot proposal regulations: sustained Massachusetts presence and accreditation; consistent governance under the same Board of Trustees; and no active investigations by the Commonwealth, federal government, or relevant oversight bodies.

Suffolk University today is a dynamic urban university with more than 6,400 students enrolled in its Law School (Law), College of Arts & Sciences (CAS), and Sawyer Business School (SBS). The University offers both full- and part-time programs for students in its three schools and offers a broad range of undergraduate, graduate, and post-graduate degrees and certificates.

Suffolk University prepares graduates who are engaged, inclusive, and ready to make a positive impact in their careers and in their communities. An experiential approach to learning is at the core of Suffolk's pedagogy. Faculty and staff are committed to implementing and integrating experiential learning throughout the student experience, both inside and outside the classroom. Suffolk's location in the heart of downtown Boston allows Suffolk students to gain unparalleled access to businesses, government, the nonprofit sector, and other real-world learning opportunities, including through

internships, service learning, immersive consulting, in-class simulations, field visits, clinical programs, and a broad range of co-curricular activities.

Suffolk's connections to the local healthcare industry are of particular relevance to this proposal. We offer undergraduate degrees in [Radiation Therapy](#) and [Radiation Science](#) and master's degrees in both clinical ([medical dosimetry](#)) and non-clinical ([healthcare administration](#)) healthcare fields. Notably, the Master of Healthcare Administration program is one of the few CAHME-accredited programs in the region. The Healthcare Administration Program benefits from a strong alumni network with connections across many local hospitals and healthcare companies, and our students gain valuable real-world experience through internships and site visits at Boston healthcare organizations. Suffolk's [class of 2023 graduate student career outcomes](#) lists the nine top full-time employers, which included Massachusetts General Hospital, Dana-Farber Cancer Institute, Beth Israel Lahey Health, and Takeda Pharmaceuticals.

As a part of our focus on expanding support for experiential and career focused educational experiences, the University dramatically expanded and re-envisioned its career development efforts with the 2021 launch of the [Center for Career Equity, Development & Success](#) (Career Center). The Career Center is committed to career readiness and to creating more equitable career paths, fields, and industries. The Career Center partners with students and faculty to promote career readiness over the course of the student's education, including developing a career plan and taking advantage of work integrated learning experiences, not simply focusing on post-graduation work. The Career Center provides industry-specific guidance through career communities, including one in [Healthcare and Wellness](#).

Programs with a practical orientation, closely linked to thriving job markets, draw students to Suffolk, and we strive to provide offerings that serve our mission. Our proposal to offer a 94-credit Applied Bachelor's degree in Healthcare Administration and Innovation, although new to us in terms of both the degree and major, is a strong fit with our mission and future goals for the university.

Rationale for the Applied Bachelor's Degree

Suffolk University is exploring a 94-credit bachelor's degree model, a novel but increasingly common approach in U.S. higher education aimed at shortening the path to a degree. Unlike traditional accelerated programs (which squeeze 120 credits into less time), this model would reduce the total credits required for graduation.

A small but growing number of non-profit institutions have begun offering bachelor's programs requiring around 90 credits (3 years) instead of the typical 120. Notably, [Brigham Young University–Idaho](#) and its affiliate Ensign College received accreditor approval in 2023 to launch seven three-year degrees (90–96 credits each) the following year. This was done by eliminating elective courses. These programs are in fields like applied business management, software development, communications, and information technology. Students complete all the same core courses and outcomes as a 120-credit degree, with only electives removed. This is a common strategy: maintain

major and general education requirements but trim free electives to shorten the degree.³

Interest in three-year degrees is rapidly expanding. A national consortium called the [College-in-3 Exchange](#) has grown from 10 participating campuses to 60 in the last four years.⁴ The impetus is to address student cost concerns and enrollment declines. Because 90-credit degree programs are brand new in the U.S., longitudinal outcome data is limited. However, early signs are positive in pilot programs. In a small pilot two-and-a-half-year health sciences program at the University of Minnesota Rochester, first-year retention was 100%¹, indicating strong student commitment when such options are offered. This suggests shortened programs can achieve high persistence if well-designed.

Suffolk would join only a handful of U.S. non-profits currently offering true reduced-credit degrees. Other New England institutions are actively exploring the idea under NECHE’s guidance (See Table 1.1). Overall, the landscape is one of experimentation driven by competitive pressure, and a well-executed 90-credit program could position Suffolk as an innovator in the Northeast, attracting students who might otherwise opt for less traditional pathways or no degree at all.

Table 1.1 Reduced Credit Degrees in New England

Institution	Status	Launch Date
Johnson and Wales University	Program open	Providence campus, fall 2025; Charlotte campus, fall 2026
Plymouth State University	Program open	Fall 2025
Rivier University	Program open	Fall 2026
Southern New Hampshire University	Program open	Fall 2026
University of Maine System	Seeking NECHE approval	Potentially summer 2026
Merrimack College	Seeking MA Board of Higher Education approval ⁵	
Springfield College	Seeking NECHE approval ⁵	
Lasell University	Member of College in 3 Consortium ⁵	

Employer feedback has also been encouraging. Industry partners indicate they value graduates entering the workforce sooner “with the same job skills,” expressing excitement to hire qualified students a year earlier.¹ In other words, as long as learning outcomes are met, employers do not mind the shorter duration (and in fact see it as a

hiring advantage). Many employers are shifting towards skills-based hiring, reducing the emphasis on traditional degree requirements. This trend highlights the need for educational programs that focus on developing specific, job-relevant skills.^{6, 7} However, actual hiring trends show that, regardless of employer philosophy or the degree requirements on a job description, candidates with degrees have considerably better outcomes when in the job market (e.g. number of applications before hire, time from start to end of search process, title and salary at end of search). A 94-credit degree is one way to bridge the gap between what employers say they value and how they actually behave.

The proposal also helps to address concerns around the increasing cost of higher education and the burden of student loan debt, which have led to a decline in public confidence in the value of a bachelor's degree. These concerns have made it imperative for universities to offer more flexible and affordable educational pathways.^{8,9,10} In terms of Suffolk's student demographic, a recent review of our student withdrawal forms reveals that 25% of students cite financial reasons for withdrawal and 45% cite personal reasons (internal Suffolk data). A 94-credit degree program can help address these challenges by providing a faster route to graduation and reducing student debt.

Standard 2: Planning and Evaluation

Suffolk University's proposal to offer a 94-credit Applied Bachelor's degree in Healthcare Administration and Innovation reflects a deliberate and data-informed planning process grounded in institutional mission, stakeholder input, and continuous evaluation. In alignment with NECHE Standard 2, the development of this program demonstrates thoughtful integration of internal governance, external feedback, and strategic assessment mechanisms to ensure educational quality and institutional effectiveness.

Internal Planning and Governance

The proposed program was developed in collaboration with Suffolk's [Pioneering Innovations in Learning Outcomes and Teaching \(PILOT\)](#) initiative, which is charged with designing and evaluating innovative academic offerings. The PILOT Advisory Committee, comprising faculty and administrators from all three schools and key administrative offices, played a central role in shaping the proposal. The committee provided guidance on program design, feasibility, and alignment with institutional goals, ensuring that the degree reflects Suffolk's academic standards and operational readiness. See Standard 3 for more details on PILOT and the governance process.

The program also underwent review by relevant academic departments and offices in Suffolk's College of Arts & Sciences and Sawyer Business School. Suffolk's core curriculum is currently under review, and any changes will be reflected in the 94-credit program to ensure that students meet the same learning goals as those in traditional baccalaureate pathways.

Program Design and Evaluation Criteria

This 94 credit major, Healthcare Administration and Innovation, was selected based on four key criteria:

1. **Clear and Measurable Learning Goals:** The program must demonstrate that students can achieve equivalent outcomes to those in 120-credit degrees.
2. **Workforce Alignment:** The major is closely tied to defined career pathways, allowing for streamlined curriculum without compromising quality.
3. **Curriculum Efficiency:** The program integrates general education through interdisciplinary coursework, maximizing credit utility.
4. **Institutional Readiness:** Suffolk has the faculty expertise, advising infrastructure, and assessment systems to support the program.

The Healthcare Administration and Innovation program leverages Suffolk's downtown Boston location with unparalleled access to the city's healthcare institutions to provide access to experiential learning opportunities and industry partnerships. The interdisciplinary nature of the major draws on expertise from Arts & Sciences, Business, and Law, and prepares students for non-clinical roles in healthcare innovation, management, and policy. Suffolk draws approximately two-thirds of its undergraduate students from Massachusetts, and 60% of those graduates remain in the greater Boston area for employment or further study, making this program a direct investment in the Massachusetts healthcare management pipeline.

The Bureau of Labor Statistics projects Medical and Health Services Managers (SOC 11-9111) will be among the eight fastest-growing occupations requiring a bachelor's degree in the country, with 23% employment growth projected from 2024 to 2034 — nearly eight times the 3% average for all occupations — adding approximately 142,900 new positions nationally over the decade.¹¹ Massachusetts is exceptionally well-positioned within this national trend. State-level long-term projections from Projections Central (2022–2032) show approximately 30% growth for this occupation in Massachusetts, with roughly 750 annual job openings expected each year. Short-term projections show a significant upward revision, with approximately 1,900 new positions anticipated per year — reflecting the accelerating demand driven by Massachusetts' aging population and its outsized role as a national hub for healthcare delivery, academic medicine, and life sciences.¹² Healthcare is also well-positioned relative to broader workforce disruption: while the World Economic Forum projects that 22% of jobs globally will be disrupted by technological change by 2030, healthcare remains one of the strongest projected growth sectors, driven by demographic shifts and rising demand for skilled professionals.¹³

The need for a stronger healthcare workforce pipeline is well-documented at both the state and regional level. The Healey-Driscoll Administration's 2024 Massachusetts Workforce Agenda identifies healthcare and human services as one of four priority industries for targeted workforce investment, noting that healthcare is the largest employment sector in the Commonwealth, employing more than 477,000 workers across clinical and non-clinical roles.¹⁴ At the regional level, the MassHire Greater Boston Regional Planning Blueprint identifies Health Care and Social Assistance as one of the fastest-growing industries in the Boston region, driven by demand from an aging population and anchored by a dense concentration of hospitals, academic medical centers, and life sciences employers.¹⁵ Suffolk's proposed program targets the administrative and operational segment of this pipeline, preparing graduates for the management roles that keep these institutions running.

In light of the demonstrated need for graduates in this sector, faculty from our Master's in Healthcare Administration (MHA) program, submitted a proposal to create a traditional BSBA in Healthcare Business and Technology in April 2025. The Provost's office and the SBS Dean's office found that the proposal demonstrated many of the strengths that we were looking for in a program for the Applied Bachelor's degree and worked with SBS faculty to revise the program as a 94-credit degree.

Learning Goals and Workforce Alignment

The MHA faculty had conducted outreach to external stakeholders, including alumni of the MHA program and regional employers, as part of their effort to understand local market needs and revise the MHA curriculum. Data were collected through 16 semi-structured interviews and 33 survey responses, analyzed for thematic insights.

The data from the interviews highlighted several key areas of focus. Interviewees suggested the curriculum should incorporate advanced training in data analytics, AI, and telehealth, reflecting the rapid technological advancements in healthcare. A significant focus on health equity, DEI principles, and cultural competency is essential,

embedding these concepts deeply to address disparities in care delivery. Interviewees also noted that operational skills, including project management, performance improvement, and resource optimization, are also critical, preparing students to enhance efficiency and manage resources effectively. Finally, human-centered skills such as emotional intelligence, effective communication, and conflict management are vital, ensuring graduates are well-rounded leaders capable of navigating complex healthcare environments and leading through future challenges.

The survey results reveal several key content areas for developing the curriculum. Change management, AI applications, and data analytics were highlighted as essential skills for future healthcare leaders. Respondents highlighted that the curriculum should incorporate performance improvement methodologies like Lean and focus on quality and patient safety. Consumerism and project management are important areas to address, particularly with the shift towards patient-centered care. Emerging trends such as "Hospital at Home," telehealth, and AI suggest the importance of including trends and innovations, as well as updating the curriculum continuously to keep pace with the rapidly evolving healthcare landscape. Finally, survey respondents highlighted that addressing healthcare disparities is crucial, as is the inclusion of population health management to reflect the growing emphasis on preventative care.

Overall, the analysis of the survey and interview data led the faculty to conclude that there is a strong need for well-honed technical skills in operations, data analytics, project management and AI, as well as a sharper focus on human-centered skills like communication, emotional intelligence, culture and DEI. These insights directly informed curriculum design and will continue to guide program refinement through ongoing employer engagement and advisory board feedback.

Evaluation and Continuous Improvement

Suffolk will implement a robust assessment plan to monitor student success and program effectiveness. (See Standard 8 for a detailed discussion of program assessment). Early evaluation mechanisms include tracking retention, persistence, and student engagement through advising and academic standing reviews. The Applied Bachelor's Advisory Board, comprising representatives from the Provost's Office, OIRA, the Career Center, program directors, and faculty advisors, will meet each semester to review available data and recommend adjustments.

As the program matures, Suffolk will collect and analyze long-term indicators such as graduation rates, job placement, and learning outcomes. These metrics will be compared to those of traditional four-year students to ensure parity in educational effectiveness. Feedback loops will allow for timely curriculum adjustments and targeted student support.

Additionally, Suffolk will collect employer testimonials and alumni outcomes to validate the program's impact and inform future marketing and planning efforts.

Strategic Positioning and Market Differentiation

Local competitors include online bachelor's degrees at Northeastern University¹⁶ and Simmons University¹⁷. Massachusetts College of Pharmacy and Health Sciences¹⁸, Stonehill University¹⁹ and Endicott College²⁰ offer face to face options. Several schools also offer a healthcare management concentration as part of a business degree, such as that offered by Emmanuel College.²¹

The proposed program is distinct from regional competitors in its accelerated structure and interdisciplinary focus. While other institutions offer healthcare management degrees, Suffolk's 94-credit model provides a rigorous, hands-on education that prepares students to be adaptable, workforce-ready generalists. Graduates will possess a unique blend of technical, operational, and leadership skills, positioning them to thrive in dynamic healthcare environments.

By embedding planning and evaluation into every stage of program development and implementation, Suffolk ensures that the 94-credit Applied Bachelor's degree meets NECHE's standards for institutional effectiveness, educational quality, and strategic innovation.

External Accreditation

SBS is accredited by [AACSB, the Association to Advance Collegiate Schools of Business](#), which is the global standard-setting body for business education. As this is a new degree offered as a pilot program (both at the university and NECHE level) rather than a traditional new BSBA program, it will be excluded from AACSB accreditation. However, AACSB does not prescribe the number of credits for each degree and relies on local accrediting agency's requirements, so we could and likely would move to include it under our accreditation if the program is approved for the long term.

Standard 3: Organization and Governance

Internal Governance Processes

The Applied Bachelor's degree proposal is the outcome of a key program emerging from our [Suffolk Forward Strategic Plan: PILOT \(Pioneering Innovations in Learning Outcomes & Teaching\)](#). As noted earlier, PILOT offers a new structure for facilitating innovative, cross-school initiatives that will help us address the evolving needs of students and employers, while generating new enrollment and revenue opportunities.

Suffolk's PILOT committee is governed by a structured and inclusive framework that aligns with the expectations of NECHE Standard 3: Organization and Governance. The PILOT Advisory Committee and its associated policies ensure that the initiative is effectively organized, transparently governed, and strategically integrated into the University's academic and administrative operations.

Organizational Structure and Governance

The PILOT Advisory Committee is composed of representatives from each academic school and key administrative units, including:

- Admissions
- Registrar's Office
- Marketing and Communications
- Budget and Financial Planning
- Career Services
- Academic Planning and Accreditation
- Faculty and Deans from each school

Members serve staggered, renewable three-year terms, ensuring continuity and diverse representation. The Committee operates in an advisory capacity, with its recommendations informing decisions made by the University's President and Provost. At their June 2025 meeting, the Board of Trustees delegated approval for PILOT initiatives, so long as there is a final consultation with the chair, vice chair, and chair of the Educational Affairs committee.

Shared Governance and Faculty Engagement

Faculty play a central role in the governance of PILOT programs. Each school appoints a faculty representative and a dean to the Advisory Committee, ensuring that academic integrity and disciplinary expertise inform all decisions. Faculty are also involved in program development, instruction, and review.

Transparent Decision-Making and Accountability

PILOT programs are evaluated using clearly defined criteria, including:

- Revenue potential
- Market demand
- Interdisciplinary collaboration
- Innovation
- Student outcomes

- Resource efficiency

All approved programs include sunset clauses with financial metrics for success. Programs that do not meet these metrics are subject to review and potential termination, with appropriate teach-out expectations. Successful programs may transition to school-based governance. This ensures that decision-making is data-informed, transparent, and accountable.

Strategic Coordination and Institutional Integration

The Advisory Committee facilitates coordination across academic and administrative units, supporting strategic planning and compliance with accreditation requirements. The initiative is overseen by [Andrew Perlman, Dean of Suffolk Law and Vice President for Academic Innovation](#), who manages operational details and ensures alignment with institutional goals. Revenue-sharing policies further integrate PILOT into the University's financial planning, with net surplus allocated to both PILOT and the central University budget.

Flexibility and Responsiveness

PILOT programs are designed to be agile and responsive to emerging trends. The governance structure allows for expedited review and launch processes, enabling Suffolk to capitalize on timely opportunities. Non-degree programs may operate outside traditional academic calendars, while degree-granting programs remain aligned with established schedules. Hybrid models are also supported, allowing for stackable credentials and flexible pathways.

PILOT Review of Applied Bachelor's Degree Proposal

Our PILOT initiative was launched in February 2025, and the Applied Bachelor's proposal was one of the first projects developed by the committee. Associate Provost Rachael Kipp worked with faculty to develop the full proposal for review by PILOT. PILOT was given regular updates on the potential degree options under consideration and the curriculum options being explored. We also sought input from relevant academic departments and from individual offices as needed.

The Applied Bachelor's Degree in Healthcare Administration and Innovation proposal was formally reviewed by the PILOT committee in July 2025. The proposal was modified based on feedback from the committee and other reviewers. A revised proposal was submitted to the committee in August, and the committee unanimously endorsed it.

After thorough discussion of the PILOT process the Suffolk University Board of Trustees voted on June 13, 2025, to grant accelerated delegate approval authority for new curricular innovations that emerge through the PILOT initiative by a vote of the Board Chair, Vice Chair, and Educational Affairs Committee (EAC) Chair. Accordingly, the proposal for the Bachelor of Applied Sciences in Healthcare Administration and Innovation was approved by a unanimous vote of the Board Chair, Vice Chair, and EAC Chair on August 12, 2025.

External Review and Approval

Although NECHE has approved some 90-credit programs under their Policy on Innovation (Table 1.1), institutions in Massachusetts face an additional barrier: Massachusetts regulations specifically state that a baccalaureate degree requires the completion of a minimum of 120 semester credits.

Suffolk's proposal is being submitted under 610 CMR 16.00, the Degree Granting Regulations for Pilot Proposals on Innovation, adopted by the Massachusetts Board of Higher Education in February 2026. Suffolk's proposal has been designed to address both of the regulation's primary evaluation criteria, innovation and consumer protection, and is submitted in direct response to the framework the Board has established.

Suffolk has also received approval from its regional accreditor. NECHE approved the Applied Bachelor's in Healthcare Administration and Innovation as a substantive change on May 4, 2026; the approval letter is included as Appendix A. Suffolk's NECHE approval is intended to support and streamline BHE's consideration of this proposal. The two processes are complementary: NECHE's review confirms that the program meets accreditation standards for academic quality, and Suffolk looks forward to demonstrating through the BHE review process that the program likewise meets the Commonwealth's requirements for degree-granting authority under the new innovation regulation.

Standard 4: The Academic Program

Program Structure and Quality Assurance

The traditional baccalaureate degree options offered by Suffolk University include a [Bachelor of Arts \[BA\]](#), a [Bachelor of Science \[BS\]](#), and a [Bachelor of Science in Business Administration \(BSBA\)](#). The BA and BS are offered through Suffolk's College of Arts and Sciences (CAS), while the BSBA is offered through the Sawyer Business School (SBS). All undergraduates fulfill the shared general education curriculum, which includes courses in the following areas: Writing; Social, Cultural, Global Perspectives; Science, Technology, & Engineering; Math; and Creativity & Innovation. In addition, the BS, BA, and BSBA each have their own "core curriculum," which provides a shared foundation for all the students earning that degree. CAS operates on a 4-credit system (4 courses and 16 credits is the standard courseload per semester), while SBS operates on a 3-credit system (5 courses and 15 credits is the standard courseload per semester).

The Applied Bachelor's in Healthcare Administration and Innovation will maintain the rigorous academic standards of Suffolk University. Students will receive a comprehensive education that includes general education courses, major-specific coursework, and practical, work-integrated learning experiences. Students enrolled in the new program will fulfill the same learning goals for the core requirements of the BSBA degrees as all other BSBA students, as well as completing the coursework in their major (see Appendix B for program learning objectives and outcomes). The proposed curriculum reflects current requirements, and any future changes in the University's core curricula would be reflected in the 94-credit baccalaureate program.

As the Applied Bachelor's program is interdisciplinary in nature, the coursework is drawn from all three schools and integrates some core coursework into the major. Work-integrated learning directly related to their major field of study will be a required element of this program, and each student will be required to complete at least one internship to earn their degree. While Suffolk does not currently offer this major, there is overlap with existing course offerings (see Table 4.1 for proposed curriculum and Appendix C for course descriptions and learning goals).

The requirements for a traditional SBS major are that a student must complete 124 total credits. There is a 45 credit residency requirement and a minimum of 30 credits of business coursework must be completed at Suffolk. A maximum of two equivalent courses from an outside institution can be applied towards the major coursework. The requirements for students in these majors will be proportional to those of the traditional majors: 34 credit residency requirement, at least 24 credits of business coursework, and a maximum of two equivalent courses may be transferred from an outside institution and applied towards the major. Students entering the Applied Bachelor's program with pre-matriculation credits will be evaluated under Suffolk's standard [advanced credit policies](#), which recognize AP examinations (scores of 3–5), International Baccalaureate examinations, CLEP examinations, military coursework evaluated through the Joint

Service Transcript and ACE credit recommendations, and credits earned through dual enrollment and Early College programs; all such credits are subject to the same transfer limits and residency requirements that apply to students in traditional baccalaureate programs. Transfer advising for students in these tracks will be clear that, similar to other highly structured majors, transfer credits may not significantly shorten time to degree.

Students in the Applied Bachelor's program who wish to transition to a traditional baccalaureate may do so; Appendix D provides a detailed example. Students who have completed the recommended three years of coursework can easily complete a 124-credit BSBA in Management with a Healthcare Systems and Innovation Minor with one additional year of study. As with any major, students who transfer late in their programs may require additional time to degree, depending on coursework completed at the time of the change — a known consideration for students across Suffolk's programs regardless of major.

Suffolk recognizes that the Applied Bachelor's structured curriculum and accelerated pace give students less flexibility to change direction mid-program. The Healthcare Administration degree is most directly aligned with SBS requirements; students choosing to transfer internally to a major outside SBS may require additional time to complete their degree. Suffolk will address this through clear pre-enrollment advising that sets expectations about the program's structured nature, its alignment with healthcare administration as a career pathway, and a time-to-degree projection provided by an academic advisor to any student considering a change of major. The program's admissions and advising materials will make clear that the Applied Bachelor's is best suited for students with a defined interest in healthcare administration — the primary strategy for ensuring the right students self-select into the program from the outset.

Students who transfer to a traditional four-year baccalaureate will need to fulfill the 45-credit residency requirement in addition to major-specific requirements. Students interested in double majoring should follow the current [policies on completing a double major](#). A discussion of pathways to a traditional baccalaureate post-graduation can be found in Standard 5.

Curriculum

The proposed curriculum includes courses in healthcare, biology, statistics, management, finance, policy, and technology (see Table 4.1 for full curriculum). Students in this program will complete the learning outcomes for a BSBA, so many of the required courses are offered by SBS. It also integrates coursework from CAS in the shared core, including a new course designed for this cohort that will fulfill the Science, Technology, and Engineering requirement and a required major Sociology course. Law is planning to offer an undergraduate-only section of their Healthcare Law and Policy course. This curriculum includes 30 credits in the shared general education requirements, 30 in the business core, and 25 credits in Healthcare Administration and

Innovation, giving students a solid foundation in business fundamentals before progressing onto developing expertise in the area of non-clinical healthcare support.

**TABLE 4.1: HEALTHCARE ADMINISTRATION AND INNOVATION CURRICULUM
94 CREDITS- FULFILLS THE LEARNING OUTCOMES OF THE BSBA CORE CURRICULUM**

YEAR 1			
	FALL SEMESTER	SPRING SEMESTER	
COURSE #1	WRI-101 First Year Writing I (4) Prereq for: SBS-110	SBS-110 Business Communications (3) Prereq for: ACCT-201, MGT-217, ISOM 210	
COURSE #2	SBS-100 (1)	SBS 104 Innovative Teaming (3) Prereq for: ACCT-201, MGT-217, ISOM 210	
COURSE #3	SBS-101 Business Foundations (3) Prereq for: SBS 104, SBS-110	EC-101 Microeconomics (3)	
COURSE #4	Social, Cultural, Global Perspectives elective (4)	Elective course (3)	
COURSE #5	MATH 128 or higher (4) Prereq for: STATS, ACCT-201	STATS-250 or 240 (4) Prereq for FIN-200, SBS 298	
CREDITS:	16	16	= 32

SECOND YEAR REQUIREMENTS:

	FALL SEMESTER	SPRING SEMESTER	
COURSE #1	ACCT-201 Acct For Decision Making I (3)	BIO 114/L114 or new STE course (STE requirement) (4)	
COURSE #2	ISOM-210 Management Info Systems (3)	HLTH-300 Healthcare Internship (3) Prereq for: HLTH 401	
COURSE #3	MGT-217 Organization Behavior (3)	SBS-298 Tackling Global Wicked Problems (3) Prereq for: HLTH 401	
COURSE #4	EC-102 Macroeconomics (3)	BLE-216 Business Ethics and Law (3) Prereq for: SBS 298	
COURSE #5	HLTH-301 Healthcare in the United States (3)	Elective Course (3)	
CREDITS:	15	16	= 31

THIRD YEAR REQUIREMENTS:

	FALL SEMESTER	SPRING SEMESTER	
COURSE #1	HLTH-303 Healthcare Operations & Innovation (3)	FIN-200 Business Finance (3)	
COURSE #2	ISOM-319 Operations Management (3)	HLTH-307 Innovative Healthcare Models (3)	
COURSE #3	SIB-429 Strategic Management (3)	SOC-253 Sociology of Health and Illness (4)	
COURSE #4	HLTH-305 Quality and Patient Experience (3)	HLTH 309: Healthcare Law and Policy (3) Undergraduate only section of LAW-2243	
COURSE #5	Elective Course (3)	HLTH-401 Healthcare Capstone: Innovation and Impact (3)	
CREDITS:	15	16	= 31

94 Total credits (includes 3 credits of the internship course)

Curriculum Modifications

Students completing the coursework for this major will fulfill all the learning outcomes of the BSBA core curriculum, but not always at the same depth as students enrolled in the traditional baccalaureate programs. In some cases, learning outcomes will be addressed in different courses. Table 4.2 lists the changes. The curriculum for both traditional and applied baccalaureate degrees will be updated to reflect any changes in either the shared core or the BSBA curricula as they are approved through faculty governance.

Table 4.2: Modifications to Completion of Learning Outcomes for BSBA

Course not required from the Shared Undergraduate Core	Students will fulfill learning outcomes in
Writing: WRI-102	WRI-101 and SBS-110 Business Communications
Creativity and Dynamic Innovation: CI	SBS-104 Innovative Teaming
Business Core	
Globalization: SIB-101	SBS-101, SBS-298, SIB-429
Marketing: MKT-210	SBS-101, SBS-298, ECON 101
Data and Decisions Analysis: ISOM-201	STATS 250 and ISOM 319 Operations Management

Internship Requirement

As part of the Applied Bachelor's in Healthcare Administration and Innovation program, students are required to complete HLTH-300, a three-credit internship course involving a minimum of 120 supervised hours in an approved healthcare setting. This in-person internship provides essential experiential learning and serves as a prerequisite for the program's capstone course. Students may complete the internship after their first year, with flexible timing across fall, spring, or summer semesters. We anticipate these to be paid internships. Students who are unable to secure a paid internship experience may be advised to leverage Suffolk's [Summer Career Development Stipend](#), which provides a \$3500 stipend for qualifying experiences. A detailed internship proposal is given in Appendix E.

Internship placements are approved by the course instructor and must include a qualified site supervisor who provides mentorship and conducts formal evaluations using a nationally recognized career readiness tool. Suffolk supports students throughout the internship process via dedicated career advising, employer partnerships, and our strategic location in downtown Boston, which offers access to a wide range of healthcare organizations.

The internship is designed to help students apply academic knowledge in real-world contexts, demonstrate ethical and inclusive practice, collaborate effectively in professional teams, and reflect on their career development. Assessment includes supervisor evaluations, student self-assessments, and a final reflection essay. Risk management protocols, including pre-placement training, site vetting, and liability coverage, ensure student safety and compliance with healthcare standards.

Standard 5: Students

Suffolk University's proposed 94-credit Applied Bachelor's in Healthcare Administration and Innovation is designed to meet the evolving needs of students seeking career-focused, time-efficient educational pathways. The program maintains the same admissions criteria as Suffolk's traditional baccalaureate degrees, ensuring consistency in academic standards and access.

This program is expected to attract a diverse population of students, including those who may be deterred by the time or financial commitment of a traditional four-year degree. By offering a structured, three-year pathway, Suffolk aims to improve access and equity, particularly for students with financial constraints or clear career objectives.

The program's affordability and accelerated timeline are aligned with Suffolk's mission of expanding opportunity and reducing barriers to degree completion.

Students enrolled in the Applied Bachelor's program will receive full access to Suffolk's academic advising, career services, and student support infrastructure. Given the compressed timeline, advising will be tailored to ensure timely course sequencing, internship placement, and career preparation. Advisors will also counsel students on the implications of the degree for graduate school or employment, and students will be asked to affirm, either electronically or in writing, that they understand.

Suffolk will maintain transparency in all communications about the program. Marketing materials, admissions information, and advising sessions will include a formal disclosure statement outlining the program's structure, accreditation status, and potential limitations regarding graduate school eligibility (see Standard 9 for the full text of the disclosure statement).

Students will be informed of their option to return and complete additional credits. However, students who leave Suffolk having completed an applied bachelor's degree but later choose to return to Suffolk or attend another institution to complete additional undergraduate credits, either to earn a certificate of post-baccalaureate studies or to earn a second bachelor's degree, will not be eligible for federal grant aid and may have limited eligibility for other federal aid programs, many of which are reserved for first-time undergraduates. For more details, see [Federal Subsidized & Unsubsidized Loans](#) and [Federal Pell Grants](#).

Students who have completed the Applied Bachelor's degree in Healthcare Administration and Innovation will be able to transition to a 124-credit program post-graduation. They will be treated as any other student who has completed a bachelor's degree returning to complete another degree would be. Their completed Suffolk coursework and requirements would be accepted. Students who earned the Applied Bachelor's in Healthcare Administration and Innovation can easily complete a 124-credit BSBA in Management with a Healthcare Systems and Innovation Minor with one additional year of coursework if they wish to remain in a related major (Appendix D).

Transferring to other majors may require additional time to graduation. If a student enrolled in this program chooses to return for a traditional 4-year baccalaureate degree, they will need to fulfill the 45-credit residency requirement, in addition to the major specific requirements. Their previous Suffolk coursework would count towards the residency requirement.

This commitment to transparency, support, and flexibility ensures that students in the Applied Bachelor's program are well-informed, well-served, and well-prepared for success during and after their time at Suffolk.

Standard 6: Teaching, Learning, and Scholarship

The Applied Bachelor's in Healthcare Administration and Innovation will be delivered by qualified faculty with expertise in healthcare management, business, law, and interdisciplinary education. The [Healthcare Administration program](#) is supported by two full-time faculty and four lecturers (Appendix F), with plans to develop two new courses specifically for the major, in addition to the internship and capstone courses. Faculty will engage in ongoing curriculum development and assessment to ensure that teaching remains aligned with industry needs and academic standards.

Teaching in the Applied Bachelor's program emphasizes experiential and work-integrated learning. Students will complete a required internship (HLTH-300) and a capstone project (HLTH-401), both designed to integrate academic knowledge with real-world application. These experiences foster critical thinking, collaboration, and professional readiness, and are assessed through supervisor evaluations, student reflections, and competency-based tools.

The curriculum (Table 4.1) is structured to ensure that students achieve the learning outcomes of Suffolk's BSBA core, with interdisciplinary coursework drawn from CAS, SBS, and Law. Students will acquire a strong foundation in business fundamentals from SBS as well as major specific courses in healthcare. In addition to offering many of the courses that fulfill the [shared undergraduate core requirements](#), CAS will develop and offer a biology course specifically designed for this cohort on human biology that fulfills the [Science, Technology and Engineering core requirement](#), and students in the program are required to take a course in the sociology of health and illness as part of their major. Law will offer an undergraduate-only section of their health law course (HLTH 309/LAW-2243: Healthcare Law and Policy). Courses are designed to develop both technical and human-centered skills, including data analytics, healthcare operations, ethics, and communication.

Faculty teaching in the program will be supported through professional development opportunities and collaborative curriculum review processes. The program will be subject to Suffolk's standard academic oversight, including [periodic program review](#) and integration into the University's [assessment](#) framework.

Standard 7: Institutional Resources

We understand that a 94-credit bachelor’s program at Suffolk will have financial implications, so we have developed a financial model to project how the shorter program will affect tuition revenue, costs, and enrollment dynamics.

Enrollment Modeling

Our enrollment modeling practices do not usually involve enrollment goals for individual undergraduate majors, as they can be volatile and difficult to predict. Predictions for a new major in an entirely new degree program are even more challenging as there is very little data on 90-credit degrees to base them on. For these reasons, we based our financial projections on two different cases.

In the first case, we assume that our initial cohort is small, with 10 students, and expands to 20 students in each subsequent year over the course of a five-year pilot (see Table G.1 in Appendix G for detailed financial projections). While the program would operate at a deficit in the first year, over the course of five years there would be a net operating surplus of \$3 million (see Table 7.1). Using the same model and parameters, an initial enrollment of 12 students would result in the program breaking even in the first year and a five-year surplus of \$4 million.

Table 7.1 Five Year Budget Projections Assuming Initial Enrollment of 10 Students per Year

	3 Year	4 Year	Change
5 year revenue	9,421,747	10,383,754	962,007
5 year aid	(5,403,881)	(5,942,605)	(538,724)
5 year net tuition revenue	4,017,866	4,441,149	423,283
Expenses	817,590	817,590	-
5 Year operating surplus/(deficit)	3,200,276	3,623,559	423,283

In the second case, we assume that the cohort of students in the new program remains steady at 30 students per year for years 1-5 (see Table G.2 in Appendix G for detailed financial projections). The increased number of students would not substantially increase the program expenses, so the projected surplus increases to almost \$6 million in this case (see Table 7.2). While we would certainly be open to enrolling a larger number of students, this number is in line with what we would expect to see given our current enrollments.

One of our most recent new business majors, [Sports Management](#), had an initial cohort size of 18 students when it opened in the fall of 2023, and currently has a total of 70

majors. If the demand for the Healthcare major is similar, then the actual revenues would lie between the enrollment cases outlined here. However, both projected enrollment cases predict that the new program would generate a surplus over five years.

Table 7.2 Five Year Budget Projections Assuming Steady Enrollment of 30 Students per Year

	3 Year	4 Year	Change
5 year revenue	15,842,115	17,862,993	2,020,878
5 year aid	(9,140,632)	(10,272,323)	(1,131,691)
5 year net tuition revenue	6,701,483	7,590,670	889,187
Expenses	817,590	817,590	-
5 Year operating surplus/(deficit)	5,883,893	6,773,080	889,187

Comparison to 4-year Models

Each student in a 94-credit (three-year) program will generate less total tuition revenue than a traditional four-year student, simply by virtue of completing 30 fewer credits. If the shortened program simply cannibalizes students who would have come for four years, it will reduce overall tuition revenue no matter how many students we enroll.

For this reason, it is critical to the initiative that it attracts new students who would not enroll for a four-year term. For Suffolk to break even on tuition income, approximately 25% of the students who enroll in the program would have to reflect a net increase in enrollment (i.e., they would not have enrolled at Suffolk but for the existence of the program). In other words, we would need about a 33% increase in enrollment in the shortened program cohort relative to what the enrollment would have been otherwise in order to compensate for the lower credits per student. Put simply, for every four students who enroll in the program, one of them would need to have enrolled at Suffolk because of the program’s existence. Thus, the program’s marketing aim should be to expand the student pool (especially drawing those who might opt out of a 4-year college due to cost/time), rather than simply diverting existing applicants into a shorter track.

To illustrate this point, we generated a comparison of financial projections comparing the costs and revenues of starting a new 3-year program with starting a new 4-year program, if both programs have the same enrollment and retention rates. Using current budget projections, a successful 4-year program would generate \$425,000 more revenue than the 3-year program over the first five years in the low enrollment scenario (Table 7.1), and \$890,000 in the high enrollment scenario (Table 7.2).

There are several ways to address this shortfall. First, as noted above, we can generate new incremental enrollment. Second, we could incur fewer costs by operating a 3-year program. And third, we might see an increase in retention.

On the cost side, a 94-credit program could yield some savings in instructional and operational costs. There are marginal savings in administrative support per student (one fewer year of academic advising, registrar activity for that student, etc.), and possibly one fewer year of student services usage (if the student graduates sooner, that's one year fewer of using library, counseling, or extracurricular resources). Since many institutional costs are fixed or semifixed, however, the per-student cost saving to Suffolk is likely to be limited.

A more promising potential financial benefit of the program (and one that aligns very well with students' needs) is that it might enhance retention and graduation rates. Though there is not a lot of retention data on three-year programs as yet, there are some indications that retention rates may be higher than average due to the cost savings and shorter timeframe necessary to obtain a degree.^{1, 22} One reason students drop out before finishing a 4-year degree is financial strain or time-to-degree; shortening the time could reduce the chances that life circumstances derail their studies. A student who might not persist through four years might successfully reach the finish line in three. In this way, the 94-credit program could boost graduation rates. There is also a psychological benefit: students see the "light at the end of the tunnel" sooner, which can motivate them to push through. Satisfied graduates who saved time/money could become positive testimonials, aiding future recruitment. As there is little data available on retention, the financial projections in this proposal assume the conservative case of the same retention rates in both the Applied and traditional cohorts.

In sum, though we anticipate that increased retention could offset some of the loss of the fourth year of tuition, the biggest impact on the sustainability of the Applied Bachelor's Program will be felt through enrollment. That is, for this program to be viable, it must attract students who would otherwise choose a different college or not attend college at all.

The promise of graduating in three years (and saving a year of tuition) is a strong attraction for cost-conscious students and families. It could expand our reach with academically prepared students who are looking for a more affordable college experience or who simply want to enter the workforce faster. According to pilot program feedback, many prospective students find a three-year option highly attractive when presented alongside a traditional four-year path.²³ Suffolk could differentiate itself in the competitive New England market as an early adopter of an accredited shorter degree, potentially drawing students away from competitor institutions that only offer the 4-year route. Additionally, adult learners or community college transfers might see an Applied bachelor's as an efficient way to complete a degree they started elsewhere. Every additional student recruited due to this unique offering contributes tuition revenue that we otherwise wouldn't have.

In sum, the financial model for the Applied Bachelor's degree accounts for reduced per-student revenue, limited per-student cost savings, and the potential for increased enrollment. Appendix G contains such a financial model.

Resource Needs and Institutional Readiness

Successfully implementing the Applied Bachelor's program will require important but modest additional resources. Below are the key resource areas and needs, along with considerations for institutional readiness:

- The current proposal includes the development of four new courses to support the Healthcare Administration and Innovation major.
- A three-year degree option introduces complexity in advising. Suffolk will likely need to cross-train existing academic advisors so that they understand the nuances of the new program. These advisors must ensure students schedule courses correctly to graduate on time, given the tighter timeline and less room for error. They will also need to counsel students on the implications of the degree (for career or grad school) and help students decide whether the three-year path is right for them. Additional student support services should be geared up as well: tutoring, writing center, and career services might see increased usage as students try to pack their learning and career prep into three years. Career counseling in particular might need to start earlier for these students (since internships and job prep will happen on an accelerated schedule).
- Implementing a new program will involve some updates to Suffolk's technological systems. Our student information system, Workday Student, will need reconfiguration to handle a different credit requirement for a subset of students. This will involve programming a new "degree type" in the system and testing it thoroughly so that transcripts, degree audits, and enrollment status tracking work correctly for the Applied Bachelor's degree students.
- To launch the 90-credit program successfully, we will need a strong marketing and communications plan. This is a new concept that must be clearly explained to prospective students, families, high school counselors, and even Suffolk's own admissions staff. Marketing materials (viewbooks, websites, FAQs) have to highlight the benefits – *graduate sooner, save money, enter the workforce earlier* – while also transparently noting any limitations (as required by NECHE, the disclaimer about recognition).

Appendix G gives spreadsheets with the details of the cost and revenue projections.

Standard 8: Educational Effectiveness

Suffolk University is committed to ensuring that the proposed 94-credit Applied Bachelor's degree maintains the same academic rigor, student learning, and post-graduate success as its traditional 120-credit programs. In alignment with NECHE Standard 8, the University will implement a comprehensive and transparent assessment strategy that supports continuous improvement and demonstrates educational effectiveness.

The assessment framework for the Applied Bachelor's program will be embedded within Suffolk's broader institutional effectiveness system, [led by the Office of Institutional Research and Assessment \(OIRA\)](#). This office routinely collects and analyzes data on retention, persistence, graduation rates, and post-graduate outcomes, and will extend these efforts to include students enrolled in the 94-credit program. While long-term indicators such as graduation and job placement rates will be tracked, we recognize that these metrics will not be immediately available for early cohorts. Therefore, Suffolk will implement a phased and responsive assessment plan that provides timely feedback during the program's initial years.

To ensure early and ongoing evaluation, the Applied Bachelor's Advisory Board, comprising representatives from the Provost's Office, OIRA, the Career Center, program directors, and faculty advisors, will meet each semester to review a range of indicators. These include enrollment trends, semester-to-semester persistence, early alert notifications, academic standing reviews, and student engagement with advising and registration. The Board will also examine institutional assessment data from shared core requirements to compare the performance of Applied Bachelor's students with the broader undergraduate population. The results of these reviews will be communicated to the PILOT advisory committee for review, as well as any changes made to address shortcomings.

In addition to institutional metrics, the program will conduct annual reviews of learning goals and curriculum maps, ensuring alignment with program-level outcomes and responsiveness to student needs. Internship placement and performance data will also be reviewed as a key indicator of applied learning and career readiness.

To guide these efforts, Suffolk has established the following specific assessment goals for the Applied Bachelor's program:

1. **Retention and Persistence:** Achieve first-to-second year retention rates within 5 percentage points of the University average for traditional undergraduates. Our retention rate for the Fall 2024 cohort is 78%. The retention and persistence rates used for the financial projections in Appendix G are based on an average of historical Suffolk data, but a comparison to the current average for students in the traditional bachelor's programs will better reflect current trends.
2. **Graduation Rates:** Attain a three-year graduation rate within 5 percentage points of the University average for the four-year graduation rate for traditional undergraduates, and a four-year graduation rate of the Applied Bachelor's

students within 5 percentage points of the six-year graduation rate for traditional baccalaureate students.

3. **Internship Success:** Place 100% of eligible students in approved internships and ensure that at least 90% receive satisfactory or higher evaluations from site supervisors.
4. **Post-Graduate Outcomes:** Within six months of graduation, at least 80% of graduates will report full-time employment, enrollment in graduate school, or participation in a service program.
5. **Student Satisfaction:** Achieve a satisfaction rate of 85% or higher on exit surveys regarding academic quality, advising, and career preparation.
6. **Federal Earnings Benchmark:** Graduate median earnings at 2 and 4 years post-enrollment meet or exceed the federal minimum earnings threshold under the Department of Education's financial value transparency framework, as measured through the College Scorecard or successor federal reporting tool.

Once the initial cohort graduates, we can move towards using the more standard longer-term indicators for the student population, including graduation and job placement rates, assessment of learning outcomes within the Healthcare Administration major, and specific questions on the student exit survey for feedback on both the major and the Applied Bachelor's program. Eventually, it would be reviewed under our [Periodic Academic Program Review](#) process, which is our internal assessment process of education effectiveness.

NECHE's expectations for shortened degree programs include rigorous assessment, evidence of comparable student outcomes, and mechanisms for remediation if gaps are identified. Our approach anticipates these requirements by embedding continuous feedback loops, dedicating staff to data collection and analysis, and maintaining flexibility to adjust the curriculum or student supports as needed. This commitment to transparency, accountability, and quality assurance will ensure that the 94-credit program meets NECHE's standards and delivers a high-impact educational experience.

Standard 9: Integrity, Transparency, and Public Disclosure

Suffolk University affirms its commitment to integrity and transparency in the design, communication, and implementation of its proposed 94-credit Applied Bachelor's degree. In alignment with NECHE Standard 9, the University will ensure that all public disclosures, marketing materials, and advising practices clearly communicate the nature, structure, limitations, and implications of this innovative degree pathway.

Degree Naming and Distinction

To avoid confusion with traditional 120-credit bachelor's degrees, Suffolk will adopt a naming convention that clearly distinguishes the 94-credit program. In accordance with NECHE guidance, the degree title will include a qualifier, "Applied Bachelor's," that signals its distinct structure and purpose. This clarity will help students, employers, and graduate institutions understand the credential's scope and intent.

Public Disclosure and Consumer Transparency

Suffolk will provide full and prominent disclosure about the 94-credit program in all marketing, admissions, and advising materials. This includes a formal Disclosure Statement (given below) that outlines the program's structure, accreditation status, and potential implications for graduate school or employment. The statement will be published on the University's website and included in brochures, application portals, and advising sessions. Students will be asked to affirm, either electronically or in writing, that they understand this is not a traditional program when declaring the major.

Key elements of the disclosure will include:

- Acknowledgment that the norm for bachelor's degrees remains 120 credits over four years, and that this program represents an approved alternative.
- Clarification that the program is best suited for students with defined career goals in specific fields, such as healthcare administration.
- Notification that the program is highly structured with limited electives, designed for timely completion.
- Assurance that the program is eligible for Title IV federal financial aid, with guidance on future aid eligibility for students pursuing additional undergraduate study.
- Transparency about potential limitations in graduate school admissions or employer recognition, and encouragement for students to verify requirements with their intended institutions.
- A pathway for students to earn additional credits post-graduation if needed, such as through a transition into a traditional four-year Suffolk degree.

This level of transparency ensures that students and families can make informed decisions and that Suffolk meets NECHE's expectations for ethical communication and public accountability.

Accreditation and Title IV Eligibility

The 94-credit Applied Bachelor's degree was submitted to NECHE as a substantive change and will comply with all accreditation mandates. We will maintain clear records of NECHE's approval and include accreditation status in all public-facing materials. The program will also remain eligible for Title IV federal financial aid, and we will provide detailed guidance on how aid eligibility may be affected by future academic decisions. Completion of the program will limit a student's eligibility for programs that are reserved for first-time undergraduates.

Ongoing Integrity and Monitoring

Suffolk will continue to monitor the program's implementation to ensure that all disclosures remain accurate and that students are supported in navigating any challenges related to the degree's structure. Admissions counselors, faculty advisors, and career services staff will be trained to communicate the program's benefits and limitations clearly and consistently. We will also collect feedback from students and alumni to refine messaging and support services over time.

By embedding transparency into every stage of the program—from naming and advising to marketing and post-graduate planning—Suffolk University will uphold the principles of integrity and public disclosure central to NECHE Standard 9.

Proposed Disclosure Statement

Suffolk University has launched an innovative option for students to obtain their applied bachelor's degrees in three years with 94 credits. The University's accreditor, the New England Commission of Higher Education (NECHE), has approved these applied bachelor's degree 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 program, students should be aware of the following:

- While Suffolk is not the only NECHE-accredited program to receive approval to offer a three-year program for students to earn their applied bachelor's degree, the norm for a bachelor's degree remains a four-year, 120-credit program. Some employers and graduate programs may not consider this program to be the equivalent to a traditional 120-credit program.
- Applied bachelor's degree 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 bachelor's degree programs in less time and with fewer credits, these programs will be highly structured with limited elective credits.
- Suffolk's applied bachelor's program is eligible for Title IV federal financial aid. However, students who leave Suffolk having completed an applied bachelor's degree but later choose to return to Suffolk or attend another institution to complete additional undergraduate credits, either to earn a certificate of post-baccalaureate studies or to earn a second bachelor's degree, will not be eligible for federal grant aid and may have limited eligibility for other federal aid programs, as these are primarily reserved for first-time undergraduates. For more details, see [Federal Subsidized & Unsubsidized Loans](#) and [Federal Pell Grants](#).
- Given that Suffolk's applied bachelor's degree program is 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.
- Some institutions may not accept Suffolk's applied bachelor's degree as an undergraduate credential sufficient for admission to graduate degree programs. It is critical that students confirm specific requirements with their institutions of choice.
- Suffolk's applied bachelor's program is currently only available for Healthcare Administration and Innovation.
- Students may transition to a traditional 124-credit BSBA at any time, including post-graduation, with all prior Suffolk coursework applied toward Suffolk's residency requirements.

Students will be asked to confirm their understanding of these terms electronically or in writing at the time of major declaration.

Conclusion

The proposed Applied Bachelor's in Healthcare Administration and Innovation represents a forward-thinking response to the shifting dynamics of higher education and workforce development. By offering a rigorous, career-aligned degree in a condensed format, Suffolk University aims to expand access, reduce time-to-degree, and meet the growing demand for skilled professionals in the healthcare sector.

This initiative is grounded in Suffolk's mission of educational excellence, inclusion, and experiential learning. The program has been carefully designed to maintain academic integrity, align with employer expectations, and support student success through robust advising, assessment, and career preparation. It leverages Suffolk's strategic location, interdisciplinary strengths, and commitment to innovation to deliver a high-impact educational experience.

The financial modeling demonstrates that the program is sustainable under multiple enrollment scenarios, with potential to generate significant net revenue while serving a broader and more diverse student population. The proposal also includes clear pathways for students to transition to traditional 120-credit degrees, ensuring flexibility and long-term value.

As Suffolk moves forward with this pilot, the University will continue to monitor outcomes, engage stakeholders, and refine the model based on data and feedback. If successful, the Applied Bachelor's framework could be expanded to other high-demand fields, positioning Suffolk as a leader in innovative undergraduate education.

This proposal reflects Suffolk's strategic vision and readiness to adapt to the evolving needs of students and society. With careful implementation and ongoing evaluation, the Applied Bachelor's in Healthcare Administration and Innovation can serve as a model for accessible, efficient, and impactful higher education.

Appendices

- A. NECHE letter of approval, dated May 4, 2026
- B. Program Learning Objectives and Learning Goals
- C. Course Descriptions and Learning Outcomes
- D. Example of Curriculum Path for Students Transitioning to Traditional Baccalaureate: 124-credit BSBA in Management with Healthcare Systems and Innovation Minor
- E. Internship Requirement Information
- F. Program Faculty
- G. Budget Projection Spreadsheets

Appendix A: NECHE letter of approval, dated May 4, 2026



May 4, 2026

Dr. Marisa J. Kelly
President
Suffolk University
73 Tremont Street
Boston, MA 02108

Dear President Kelly:

I am pleased to inform you that at its meeting on April 23, 2026, the New England Commission of Higher Education considered, pursuant to its Policy on Innovation, the proposal submitted by Suffolk University regarding its plans to offer a 94-credit Applied Bachelor's in Healthcare Administration and Innovation degree program and took the following action:

that Suffolk University's plans to offer a 94-credit Applied Bachelor's in Healthcare Administration and Innovation degree program be approved and the Applied Bachelor's in Healthcare Administration and Innovation encompassed within the institution's accreditation with an effective date of April 23, 2026, contingent upon final approval from the Massachusetts Department of Higher Education;

that approval for reduced-credit bachelor's degrees be limited to the Applied Bachelor's in Healthcare Administration and Innovation and that the institution be reminded that any plans to offer other such programs need to be submitted to the Commission for review in keeping with its Policy on Innovation;

that a visit to assess implementation of the Applied Bachelor's in Healthcare Administration and Innovation degree program be scheduled for Spring 2027 and the report prepared in advance of the site visit give emphasis to the institution's success in:

1. achieving the enrollment and financial goals set for the Applied Bachelor's in Healthcare Administration and Innovation degree program;
2. ensuring sufficient faculty and staff to oversee the quality of the Applied Bachelor's in Healthcare Administration and Innovation degree program;
3. providing adequate resources and student services to support the Applied Bachelor's in Healthcare Administration and Innovation degree program;
4. implementing relevant approaches to assess the achievement and success of students in the Applied Bachelor's in Healthcare Administration and Innovation degree program;
5. clarifying in its disclosure statements that some employers may not consider the Applied Bachelor's in Healthcare Administration and Innovation equivalent to a traditional 120-credit bachelor's degree;

that the interim report scheduled for consideration in Fall 2028 be confirmed;

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neche.org

that the Fall 2032 comprehensive evaluation be confirmed.

The Commission gives the following reasons for its actions.

The proposal submitted by Suffolk University was approved and the 94-credit Applied Bachelor's in Healthcare Administration and Innovation degree encompassed within the institution's accreditation, contingent upon final approval from the Massachusetts Department of Higher Education (MDHE), because it provided evidence that the proposed degree will be offered in accordance with the Commission's Policy on Innovation and its Guidance for Institutions Preparing Proposals to offer Baccalaureate Degrees of Fewer than 120 Credits. Suffolk University is asked to forward notice of its approval from MDHE when it has been secured.

The Commission commends Suffolk University for its:

- detailed innovation proposal to offer a 94-credit Applied Bachelor's in Healthcare Administration and Innovation that was developed through its PILOT initiative and "informed by employer and alumni feedback." The report further demonstrated the degree program's alignment with each of the requirements in the Commission's guidance documents.
- thoughtful curriculum design that includes an "appropriate mix of credits in the major, in general education, and electives." There is also a pathway for students to transition to the institution's 120-credit Bachelor of Science in Business Administration degree program should they so choose prior to or after graduation.
- commitment to ensuring that the Applied Bachelor's degree program "maintains the same academic rigor, student learning, and post-graduate success as its traditional 120-credit programs." Retention, graduation, and post-graduation outcomes will be evaluated against specific goals, along with "enrollment trends, semester-to-semester persistence, early alert notifications, academic standing reviews, and student engagement with advising and registration."

In the report prepared in advance of the Spring 2027 site visit, the Commission asks Suffolk University for an update on its success in implementing the Applied Bachelor's in Healthcare Administration and Innovation, giving emphasis to the following areas:

1. **Achieving the enrollment and financial goals set for the Applied Bachelor's in Healthcare Administration and Innovation degree program (*Students, Statement of the Standard*; 7.6, 4.8).**
2. **Ensuring sufficient faculty and staff to oversee the quality of the Applied Bachelor's in Healthcare Administration and Innovation degree program (4.22, 6.2, 6.3).**
3. **Providing adequate resources and student services to support the Applied Bachelor's in Healthcare Administration and Innovation degree program (5.9, 5.10, 7.21, 7.22).**
4. **Implementing relevant approaches to assess the achievement and success of students in the Applied Bachelor's in Healthcare Administration and Innovation degree program (8.5, 8.8).**

Dr. Marisa J. Kelly
May 4, 2026
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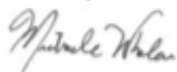
5. **Clarifying in its disclosure statements that some employers may not consider the Applied Bachelor's in Healthcare Administration and Innovation equivalent to a traditional 120-credit bachelor's degree (9.11).** The proposed disclosure statement regarding the University's 94-credit Applied Bachelor's degree would be strengthened by adding language regarding the potential consideration by employers of reduced-credit baccalaureate degrees.

The Commission expressed appreciation for the report prepared by Suffolk University and hopes that the evaluation process has contributed to institutional improvement. It appreciates your cooperation in the effort to provide public assurance of the quality of higher education.

You are encouraged to share this letter with all of the institution's constituencies. It is Commission policy to inform the chairperson of the institution's governing board of action on its accreditation status. In a few days we will be sending a copy of this letter to Robert C. Lamb, Jr. The institution is free to release information about the evaluation and the Commission's action to others, in accordance with the attached policy on Public Disclosure of Information about Affiliated Institutions.

If you have any questions about the Commission's action, please contact Lawrence M. Schall, President of the Commission.

Sincerely,



Michael Whelan

MW/kck

cc: Robert C. Lamb, Jr.

Attachment: Procedures for the Substantive Change Evaluation Visit
Public Disclosure of Information about Affiliated Institutions

Appendix B: Program Learning Objectives and Outcomes

Program Learning Objectives

Graduates of the healthcare administration and innovation major will be able to:

17. **Understand the Structure and Dynamics of the U.S. Healthcare System:** Students will be able to compare the foundations of US healthcare organization, financing, and delivery to international systems.
18. **Apply Interdisciplinary Knowledge to Healthcare Challenges:** Students will integrate concepts from healthcare management, sociology, operations, policy, and ethics to develop innovative solutions addressing access, quality, and equity.
19. **Drive Operational and Systems Improvement:** Using performance improvement methods (including Lean and Six Sigma), data analytics, and emerging technologies such as AI, students will make recommendations to transform service delivery and healthcare operations.
20. **Navigate Legal, Regulatory, and Policy Environments:** Students will apply legal and compliance frameworks—including HIPAA, fraud and abuse statutes, and informed consent—to ensure ethical and accountable healthcare practice.
21. **Advance Patient-Centered and Equitable Care Models:** Students will apply the Quintuple Aim framework to co-create care models that advance equity and health outcomes across diverse populations.
22. **Communicate, Collaborate, and Lead for Impact:** Students will demonstrate strong communication, teamwork, and leadership through interdisciplinary projects that produce measurable impact for healthcare partners.

Program Learning Outcomes

By the end of the program, students will be able to:

1. **Describe and compare healthcare systems and delivery models** in the U.S. and globally, with attention to structure, outcomes, and opportunities for innovation.
2. **Analyze healthcare challenges using data, systems thinking, and improvement tools** to identify inefficiencies and develop solutions that enhance performance and patient outcomes.
3. **Apply operational and technological innovations** (such as Lean, Six Sigma, AI, and care redesign) to improve patient flow, resource use, and clinical decision-making.
4. **Evaluate and design care models that address health inequities and social determinants of health**, and propose novel, sustainable approaches aligned with the Quintuple Aim.
5. **Interpret and apply regulatory frameworks** to ensure compliance while supporting innovative practices in healthcare organizations, research, and community settings.
6. **Lead consulting or applied projects with healthcare partners**, generating actionable, evidence-based recommendations through interdisciplinary teamwork and stakeholder engagement.

Appendix C: Course Descriptions and Learning Outcomes

[Link to folder containing course syllabi](#)

Course Descriptions and Learning Outcomes for Existing Major Courses

HLTH 301 Healthcare in the United States

This course provides an overview of the origin, organization, financing, and delivery of healthcare in the U.S. In this course, students will compare the performance of the healthcare system in the U.S. to other countries and understand the major components of the system and how they relate to each other. Moreover, students will explore critical issues and trends facing patients, providers, and healthcare delivery organizations and develop an understanding of recent policy and market changes that have influenced patient access, outcomes, and experiences while pushing for containing healthcare spending. This course is helpful for any student who is interested in working in the healthcare industry.

Learning objectives:

During this course students will:

- Analyze key forces in the society, economy, and political system that have shaped and are shaping the healthcare system.
- Demonstrate an in-depth understanding of the organization and delivery of health services in the United States, including key constituencies.
- Collaborate with classmates to synthesize information about a specific healthcare trend and deliver an effective presentation to share that information.
- Analyze key aspects of the healthcare environment and the implications for healthcare management and leadership.
- Describe the healthcare workforce and analyze the challenges it faces in meeting the current and future demand for health services.
- Analyze ethical dilemmas in healthcare.

HLTH 307 Innovative Healthcare Models

This case-based course will engage students in the analysis of varied models of care delivery in the U.S. and internationally. Cases will illuminate principles and frameworks for the design of efficient and effective models for caring for different populations within the contextual and financial constraints of different health systems and countries. Students will explore accountable care organizations, patient-centered medical homes, fully integrated health systems (such as Kaiser Permanente), equitable health systems with excellent patient outcomes (such as Spain's health system), and models which address the social determinants of health (such as the Camden Coalition or Commonwealth Care Alliance). This course is useful for any student interested in understanding the range and diversity of care delivery models operating worldwide.

Learning objectives:

During this course students will:

- Analyze care delivery models in the U.S. and internationally, evaluating their effectiveness, efficiency, equity, and alignment with population health needs.
- Apply principles and frameworks for care model design to assess how health systems address clinical, financial, and social determinants of health in varied contexts.
- Evaluate the role of organizational structures, such as accountable care organizations, patient-centered medical homes, and integrated health systems, in promoting high-quality and coordinated care.
- Identify opportunities for innovation in healthcare delivery by examining how novel models and cross-sector partnerships can improve outcomes, reduce costs, and advance health equity.

SOC 253 Sociology of Health and Illness

Provides students with an introduction to how social norms, structures, and practices shape experiences of illness and health. Among the topics covered are: health and the environment, the reasons some groups of people are less healthy than others, living with chronic illness and disabilities, and public debates surrounding issues such as performance enhancing drugs and sports, Attention Deficit Disorder and the HPV vaccine.

Learning objectives:

During this course students will:

- Understand the social construction of health and illness.
- Understand why morbidity rates vary.
- Understand the illness experience.
- Understand how social inequalities impact health and illness.
- Understand relationships between power and the treatment of illness.

Course Descriptions and Learning Outcomes for Proposed New Courses

HLTH 303 Healthcare Operations and Innovation

This course introduces students to the fundamentals of healthcare operations management, with a focus on improving patient flow, capacity, and resource utilization across clinical settings such as emergency departments, operating rooms, and outpatient clinics. Students will analyze real-world scheduling challenges, apply sequencing rules, and assess productivity using key performance indicators. This course also covers process improvement through Lean Six Sigma, healthcare supply chain management, and innovative approaches to redesigning operations. In addition, students will explore the growing role of artificial intelligence in optimizing scheduling, forecasting, and decision-making in healthcare delivery.

Learning objectives:

During this course students will:

- Analyze operational challenges across clinical settings to evaluate strategies to improve patient flow, capacity, and resource utilization.
- Apply scheduling techniques, sequencing rules, and key performance indicators to assess and enhance the efficiency of healthcare delivery processes.
- Use process improvement methodologies to identify waste, streamline operations, and support quality and efficiency goals.
- Evaluate the potential of artificial intelligence and emerging technologies to improve forecasting, scheduling, and decision-making in healthcare operations.

HLTH 305 Quality and Patient Experience

This course introduces students to the core concepts of quality, safety, and patient experience in healthcare. Students will learn how quality is defined, measured, and improved across different healthcare settings, and why it matters for patients, providers, and healthcare organizations. The course covers key topics such as building a culture of safety, driving continuous improvement, and aligning teams around quality goals. Special focus is placed on understanding the patient experience and exploring strategies to improve it as an essential part of delivering high-quality patient-centered care.

Learning objectives:

During this course students will:

- Demonstrate an understanding of the foundational concepts and language of healthcare quality, safety, and patient experience.
- Describe how quality, safety, and patient experience are defined, measured, and applied across healthcare settings.
- Analyze the role of leadership in fostering a culture of safety and continuous improvement.
- Identify strategies to align teams around shared quality goals.

- Interpret quality and safety data, identify patterns, and use data to inform decision-making.
- Evaluate strategies for using patient experience data to improve and enhance patient-centered care.

HLTH 309 Healthcare Law and Policy
(Undergraduate only section of LAW-2243)

The course introduces students to the United States health care system. The course will examine the law relating to health care institutions, (hospitals, managed care organizations, and other payers and providers) and selected health care programs such as Medicare and Medicaid. Specifically, the course examines how health care providers are reimbursed, the regulation of health care facilities, the tax status of health care institutions, fraud and abuse laws, the patient-doctor relationship, informed consent, and selected issues in bioethics. The casebook will be supplemented by current legal materials.

Learning objectives:

During this course students will:

- Describe the key laws, regulations, and oversight bodies that govern healthcare organizations and professionals in the United States, including HIPAA, fraud and abuse statutes, and patient consent laws.
- Analyze how healthcare organizations manage legal and regulatory risk while upholding patient protections, ethical standards, and compliance requirements.
- Explain the roles and responsibilities of federal and state agencies in regulating healthcare delivery and enforcing standards.
- Evaluate the legal obligations and accreditation requirements of various healthcare stakeholders, including hospitals, insurers, pharmaceutical companies, and researchers in both academic and industry settings.
- Apply legal and regulatory principles to real-world scenarios involving patient rights, provider responsibilities, research protections, and nonprofit healthcare governance.

HLTH-300 Healthcare Administration Internship

See Appendix E for details

The internship enables students to learn about important aspects of healthcare by working in a healthcare organization. For all students, the internship provides networking opportunities for future career development. The internship requires each student to complete 120 hours of supervised work in a healthcare organization and complete a reflection assignment.

Learning objectives:

During this course students will:

- Apply healthcare administration knowledge in real-world contexts
- Demonstrate ethical, inclusive, and culturally competent practice

- Communicate and collaborate effectively in professional teams
- Reflect on career fit and professional growth through experiential learning

HLTH 401 Healthcare Capstone: Innovation and Impact

This capstone course provides students with the opportunity to apply the interdisciplinary knowledge and skills developed throughout the healthcare major to real-world challenges in healthcare delivery, access, and innovation. Working in small teams, students will partner with healthcare organizations or community-based groups on a semester-long consulting project. Under the guidance of a faculty mentor, students will engage in problem identification, stakeholder analysis, solution design, and the development of actionable recommendations. Projects will be guided by the principles of the Quintuple Aim—improving population health, enhancing the patient experience, reducing costs, supporting care team well-being, and advancing health equity. Students will strengthen their skills in project management, business communication, and evidence-based analysis. The course culminates in formal presentations to project partners and invited guests from the healthcare sector.

Learning objectives:

During this course students will:

- Integrate interdisciplinary knowledge and skills to analyze real-world healthcare challenges through a team-based consulting project.
- Apply project management, stakeholder analysis, and evidence-based decision-making to design solutions that address organizational or community healthcare needs.
- Develop actionable recommendations aligned with the principles of the Quintuple Aim, including improving population health, enhancing patient experience, reducing costs, supporting care team well-being, and promoting health equity.
- Identify and apply innovative approaches to healthcare problem-solving.
- Demonstrate professional communication and presentation skills through the preparation and delivery of formal project reports to healthcare partners and stakeholders.

Learning Outcomes for Shared Undergraduate Core Courses (Part of Suffolk's General Education Requirements)

A. Writing: WRI-101, SBS-110

The writing learning goals are introduced through Suffolk's [first year writing program](#). Recent assessment results on written [communication](#) can be found on the results page for Institutional Results and Assessment.

Learning Goals

Upon graduation from Suffolk, successful students will be able to communicate effectively in diverse contexts, put their education into practice, and engage in lifelong learning. More specifically, successful graduates will be able to:

- Understand academic writing as a revision-based process.
- Understand the rhetorical situation and other elements in composing an expository essay.
- Display critical thinking in academic writing.
- Understand academic work as a recursive process of inquiry, using writing and research to form new questions and pursue existing enduring questions.
- Understand genre expectations for some research-based writing contexts within the university.
- Understand how to read and think critically about different social and cultural perspectives in the texts they study and understand how these perspectives are a part of larger ongoing conversations.

B. Math: MATH 128 or higher

The course or courses taken to fulfill the math learning goals will depend on the student's preparation and declared major. Information about the math placement exam can be found [here](#).

Learning Goals

Upon graduation from Suffolk, successful students will:

- Understand descriptive, quantitative information and data given in a variety of formats.
- Understand the foundations (at the college level) of how to employ the thinking skills of scientific and mathematical analysis to solve problems.
- Know how to draw, analyze and convey meaningful quantitative conclusions.
- Understand descriptive, quantitative information and data given in a variety of formats.
- Know basic mathematical skills needed to work with quantitative information.
- Understand the foundations (at the college level) of how to employ the thinking skills of scientific and mathematical analysis to solve problems.
- Be open to dealing with quantitative material in life and other courses.

C. Social, Cultural, and Global Perspectives: SCGP Elective

SCGP/Perspectives learning goals are introduced through courses offered from a number of different departments, [Recent assessment results](#) can be found on the results page for Institutional Results and Assessment.

Learning Goals

Upon graduation from Suffolk, successful students will demonstrate an awareness of diverse perspectives and people, an understanding of why things are the way they are in terms of contexts and history, and an ability to adapt to and work in circumstances involving individual differences. More specifically, successful graduates will be able to:

- Understand the mechanisms through which social, cultural or global differences are perceived, understood and constructed.
- Understand the role of power in creating conflict over differences within the changing historical and cultural contexts.
- Analyze how competing perspectives of diverse communities influence change within a social, cultural or global context.

D. Science, Technology, and Engineering Requirement: BIO 114/L114 Organismal Biology OR Introduction to Human Biology (New course, not yet formally approved)

BIO-114/L114 Organismal Biology

Rigorous introduction to organismal biology emphasizing evolution, phylogenetics, form, and function. This is an introductory course required of all biology majors and minors, and some non-biology science majors. This course is not recommended for the non-science student.

Laboratory sessions include a series of laboratory experiences in evolution, diversity, anatomy and physiology.

Introduction to Human Biology (Course number TBD)

Our bodies are machines that tell a story. This course explores the evolution of the human career by understanding the body's history and quirks and how the body controls and sustains itself. Other topics include disease processes that derail the body's normal function and how cultural and demographic changes affect individual and population health.

Learning Goals

Upon completing this course students will understand that the STE disciplines involve a manner of inquiry and a process and are not just content.

- Upon completing this course students will know the skills required to locate and understand scientific/technical literature.
- Upon completing this course students will understand the relationship between natural science and technology, the implications of scientific discoveries, and the potential of the STE disciplines to address problems of the contemporary world.
- LAB COURSES ONLY: Upon completing this course students will understand the process of science.

E. Creativity and Dynamic Innovation: SBS 104

Courses in Creativity and Innovation are drawn from many different disciplines at Suffolk. The learning outcomes for this requirement will be fulfilled in SBS 104 rather than in one of the traditional CI courses.

Learning Goals

Upon graduation from Suffolk, successful students will recognize and foster creative vision, meet and respond to ambiguity and risk in a variety of contexts, and cultivate the knowledge and skills necessary to engage in innovation and collaboration across disciplines. More specifically, successful graduates will understand that:

- We all have the potential to be creative.
- Problems can be solved in creative ways.
- Collaboration cultivates creativity.
- Risk-taking and resilience are important elements in the creative process.

SBS-100 Pathways to Success – Navigating Your First Year at Suffolk University

SBS 100 engages students in a series of activities, discussions, and programs on campus to explore their interests and strengths and learn how courses and co-curricular experiences together help them achieve their goals. Students also develop innovation, team, and presentation skills, get involved on campus, and learn about campus resources and services that aid in a successful college experience.

Learning Goals

Students will:

- Develop strategies to support a successful transition to Suffolk University.
- Utilize campus resources effectively to support academic and personal growth.
- Cultivate introductory, practical skills to support successful entry into the professional world.

Course Descriptions and Learning Goals for Courses That Fulfill General Education Requirements

SBS-104 Innovative Teaming

Teams and entrepreneurial thinking are critical to the success of organizations. This course offers a compelling view into team dynamics – what makes teams succeed and fail and how to work effectively in a team environment. You will focus on building effective teams, managing relationships in teams, and addressing team challenges. As an entrepreneurial thinker, you will develop your skills to analyze market needs, detect opportunities, and creatively design solutions to solve problems. Your journey includes networking in the field and introducing the tools you will need for success, including design thinking, business models, venture funding, and pitching.

Learning Goals

Students will:

- Understand how teams function and how they are structured.
- Understand the importance of diversity in a team especially with regard to effective teamwork.
- Gain insight into the dynamics that make teams successful.
- Know how to recognize the characteristics of an entrepreneurial mindset and how they apply to both new ventures and existing organizations.
- Understand and apply techniques for generating new ideas.
- Know how to present new business/ product/ service ideas effectively in different contexts.

*This course will also fulfill the learning goals of the CI requirement.

SBS-110 Introduction to Business Communications

Excellent communication skills (both oral and written) are top requirements for professional roles. To succeed in a professional role and to effectively leverage future communication technologies and media, you must be a critical reader, have strong foundational writing and editing skills, and be able to effectively incorporate data and support evidence for persuasive story telling. In this course, you will learn to write effectively for business by: focusing on your audience, purpose, and tone; learning to design various business documents; revising and refining your writing and improving your professional vocabulary; and by crafting strong ideas and arguments that incorporate support evidence and data visualization.

Learning Goals

- Students will understand the expectations of communication in the workplace.
- Students will develop confidence as business professionals, to write and speak clearly, concisely, and effectively for the audience and purpose.
- Students will learn that composing a successful document frequently takes multiple drafts, with varying degrees of focus on generating, revising, editing, and proofreading.
- Students will develop awareness of ethical, legal, cultural, and global issues affecting business communication.

*This course will also contribute to the learning outcomes of the writing requirement.

BLE-216 Business Ethics and Law

Business Ethics is applied ethics. Explores the roles and responsibilities of business in a global society. Teaches models of ethical decision-making that incorporate multiple points of view, including diverse cultural worldviews and legal perspectives. Incorporates strategies to voice values when constrained by workplace pressure. Addresses factors that contribute to and constrain ethical behavior in and by organizations. Students apply concepts to current business problems, such as anti-trust, artificial intelligence, accounting fraud, deceptive advertising, and environmental dumping. There is also a self-development aspect to this course, as students are encouraged to clarify and define their values, understand how those values may be challenged at work, and practice ways to stand up for and give voice to their values in different scenarios.

Learning Goals

Students will know/understand:

- Why it pays to be ethical in business.
- What ethical issues commonly arise in business.
- The three primary ethical decision-making frameworks – utilitarianism, deontology, and virtue ethics -- and how to use them.
- The processes of generating solutions to ethical dilemmas.
- The relationship between law and ethics.
- Strategies that facilitate giving voice to deeply held personal values.
- Ethical stakeholder analysis.
- Ethical norms can vary across countries.
- The emerging ethical implications of artificial intelligence in the business context.

STATS-250 Applied Statistics

Application of statistical analysis to real-world business and economic problems. Topics include data visualization, measures of central locations and dispersion, probability and probability distributions, estimation and hypothesis testing, and regression. The use of Excel is emphasized throughout the course.

Learning Goals

Students will:

- know how to recognize and interpret quantitative information.
- understand the theoretical basis of quantitative reasoning.
- understand the practical application of quantitative data analysis.

*This course includes some of the learning outcomes formerly addressed in ISOM-201.

Course Descriptions and Learning Goals for Business Core Courses

SBS-101 Business Foundations

This course introduces students to foundational concepts in business, including functional areas, the life cycle, competition, stakeholders and ethical considerations. Students develop critical thinking by learning and using a problem solving process through a business situation analysis model to analyze various situations that confront managers and founders of small, medium, and large organizations. Students will also develop tools for analysis, allowing them to critically view business in a new and thoughtful way. The class culminates with student- teams presenting a detailed analysis and recommendations to a panel of executives and persuading them that the recommended strategy is not only feasible, but also practical for the stakeholders involved.

Learning Goals

Students will:

- Demonstrate a comprehensive understanding of the nature and purpose of business, including its functional areas and how they are connected.
- Demonstrate a comprehensive understanding of the role of stakeholders in a dynamic global landscape shaped by social and technological changes.
- Demonstrate the ability to form aesthetic judgments about forms or examples of business decision making.
- Apply effective problem-solving processes in real-life business cases, utilizing critical thinking and analytical skills to identify, evaluate, and articulate feasible and compelling business opportunities.
- Collaborate effectively within student teams to conduct in-depth analyses and generate well-supported business recommendations.
- Culminate in the delivery of persuasive presentations that demonstrate the feasibility and scalability of proposed strategies for all stakeholders involved.
- Formulate and express business arguments in aesthetics ways (both orally and in writing).
- Demonstrate a high level of professionalism, equipped with the skills and knowledge necessary to excel as a business professional.
- Develop AI skills to enhance critical thinking for business analysis and decision-making processes.

*This course includes some of the learning outcomes formerly addressed in SIB-101 and MKT-210.

EC-101 Applied Microeconomics

This course introduces students to foundational principles of microeconomic theory, with an emphasis on applications of concepts to management decision-making in specific industry and market settings. It describes and analyzes the interaction of supply and demand and the behavior of the prices of goods, services. It explains the determinations of costs, output, strategic pricing, cost-benefit analysis, and governance by firms under conditions of perfect and imperfect competition in a global economy. In addition, it

describes the supply and demand for factors of production and the impact of taxes and government regulation and intervention on firms and consumers.

Learning Goals

Students will:

- understand the interaction and relationships among people, institutions and the social environment.
- understand the role of theory and research in social science analysis.
- know how to apply a social science approach to the study of the social world.
- understand how learning and experiences inside and outside the classroom are connected and interdependent.

*This course includes some of the learning outcomes formerly addressed in MKT-210.

EC-102 Global Macroeconomics

This course examines the workings of the national and the global economy. It will describe the determination of Gross Domestic Product, the problems of unemployment, inflation, and the determination of economic growth. It will also describe and analyze the determination of the country's exchange rate, the balance of payments, and international borrowing and lending. A particular focus will be on understanding economic fluctuations (booms, busts, and recessions) in the domestic economy and its effects on other economies. It will analyze the role of the government and the effects of government spending and taxation on the economy. Furthermore, it will describe and analyze the determination of the quantity of money and interest rates in the economy and the role of the country's central bank. It examines the basis and pattern of international trade and the effects of a country's trade policy on the economy.

Learning Goals

Students will:

- Understand, and critically evaluate macroeconomic issues.
- Analyze the effects of the government economic policies.
- Develop a capacity to read and understand real world macroeconomic issues as presented in the media.
- Apply economic reasoning to real world macroeconomic problems that arise at both the national and international level.
- Recognize the close relationship between conceptual reasoning in economics and economic policymaking.

ACCT-201 Acct For Decision Making I

Introduces students to the accounting cycle, the financial statements, and the theory underlying accounting as information. Provides users of accounting information with a basic understanding of how to appraise and manage a business. Addresses current accounting topics, including relevant ethical, ESG, and international issues found in the financial press.

Learning Goals

Students will:

- Know how to record a business's transactions and prepare a set of financial statements.

ISOM-210 Management Information Systems

This course examines the rise of information-enabled enterprises and information technologies/information systems (IT/IS) as key enabler of businesses and social changes globally. The students will learn how to effectively use IT/IS to support strategic planning, provide a competitive advantage, decision support, managerial control, operations, and business process integration in the digital economy. The course also looks at the role of emerging technologies in shaping organizations and examines the IT/IS-related issues of ethics, privacy, piracy, and security in the information society.

Learning Goals

Students will:

- Understand the need for constant innovation by evaluating applications of information systems to support strategic planning.
- Understand how information systems infrastructure and services are managed by applying cloud computing solutions and evaluating different options.
- Analyze how businesses use e-commerce to support business processes and decision-making by creating a website for an online business and evaluating its performance.
- Understand how businesses use databases and data mining to support business processes and decision-making by creating a database and performing data analysis.
- Evaluate how businesses use enterprise systems to support business processes and decision-making by implementing business operations in an ERP environment.
- Understand how businesses use supply chain management (SCM) and customer relationship management (CRM) systems to support business processes and decision-making by executing related tasks in an enterprise solution.
- Identify and analyze ethical and security challenges facing IS practitioners by evaluating the security risks and developing protection plans and offering privacy policies.

MGT-217 Organization Behavior

This course explores the application of sociological, psychological, and anthropological concepts in domestic and international business settings. Attention is given to the study of human behavior in organizational settings, the organization itself, and human interactions.

Learning Goals

Students will:

- Understand the relevance of organizational behavior to both business and yourself.
- Develop a better understanding of how individual employees operate within the workplace.

- Understand the importance of interpersonal dynamics.
- Gain insight into organizational processes.

SBS-298 Tackling Global Wicked Problems

SBS-298 will focus on addressing wicked problems, understanding the challenges they pose, and working towards creative solutions. SBS-298 will integrate freshman level business skills giving students a forum for practicing business decision-making in the context of solving global social challenges. Students will consider problems that the private sector can solve with innovation and focus on “no further harm.” Potential solutions such as these are hotly debated and give the perfect setting to practice recognizing and evaluating facts, ideas, opinions and arguments. Students will define the goals, interests and concerns of multiple stakeholders using research skills, entrepreneurial thinking, public policy, and other skills developed during their freshman and early sophomore years. Using storytelling and data visualization, students will pitch their solutions. Students will work in an experiential and collaborative learning environment as they develop the skills and knowledge to identify, conceptualize, and working on a wicked problem. Students can apply the skills built here on their major classes in subsequent semesters.

Learning Goals

Students will:

- Identify the ways in which system components interact to create the social challenge.
- Understand the components needed to structure a manageable and achievable team project.
- Understand a range of ways that data and research can be used to creatively and pragmatically solve a pervasive challenge or wicked problem.
- Think critically about complex challenges.
- Understand a variety of ways to present findings persuasively.
- Demonstrate the ability to form aesthetic judgments about forms or examples of business decision-making for solving complex problems.
- Formulate and express business arguments that aesthetically balance the trade-offs and tensions among stakeholders.

*This course includes some of the learning outcomes formerly addressed in SIB-101 and MKT-210.

ISOM-319 Operations Management

Introduces concepts and tools for managing operations in manufacturing and service organizations that transform inputs such as raw materials or customer orders to create goods or services. This course addresses strategic, tactical, and operational issues in operations strategy, product and process design, quality management, statistical process control, capacity management, supply chain management, inventory management, lean operations, and waiting-line models. By blending analytical methods and case studies, this course empowers managers to tackle operational decisions in global and local business environments.

Learning Goals

Students will:

- Understand the principles and concepts of Operations Management (OM).
- Use a systems approach to OM decisions.
- Understand the analytical methods for OM decisions.
- Understand trends and innovations in OM.
- Develop communication skills. for OM decisions.

*This course includes some of the learning outcomes formerly addressed in ISOM-201.

SIB-429 Strategic Management

This course covers and integrates administrative processes and decision making under uncertainty in business areas of marketing, accounting, management, finance, personnel, and production. It also focuses on strategic and policy issues from the viewpoint of senior management in both domestic and international corporations. Case discussions help develop the conceptual framework for analysis and implementation of strategy and policy decisions.

Learning Goals

Students will:

- Understand external and internal factors as related to strategic management of the firm.
- Be able to formulate competitive strategy.
- Be familiar with the integration of functional areas.
- Understand practical managerial implications.

*This course includes some of the learning outcomes formerly addressed in SIB-101.

FIN-200 Business Finance

This course is a study of the functions of business finance. It focuses on basic financial principles such as time value of money, risk and return tradeoffs, and asset valuation.

Learning Goals

Students will:

- Understand how market rates of return determine the time value of money.
- Understand and know about various corporate securities such as stocks and bonds.
- Understand how required rates of return are established in the markets and how they are related to underlying level of risk.
- Know how investment projects are analyzed using various investment evaluation criteria.
- Understand the concept of incremental cash flows and how they determine the value of a project.
- Understand how weighted average cost of capital (WACC) is determined and used in project evaluation.

Appendix D: Curriculum for Students Transitioning to 124 Credit Degree in Management with Healthcare Systems and Innovation Minor

- Coursework for 94 credit degree in Healthcare Administration and Innovation fulfills coursework for minor
- Students must complete three required Management courses and three additional Management electives
- All prior Suffolk coursework will count towards the 45 credit residency requirement for the 124 credit degree

FOURTH YEAR REQUIREMENTS:

	FALL SEMESTER	SPRING SEMESTER	
COURSE #1	MGT-305 Negotiations (3)	MGT-419 Management Consulting Project (3)	
COURSE #2	MGT-322 Managing Across Differences (3)	Management elective (3)	
COURSE #3	Management elective (3)	Management elective (3)	
COURSE #4	Free elective (3)	Free elective (3)	
COURSE #5	Free elective (3)	Free elective (3)	
CREDITS:	15	15	= 30

Appendix E: Internship Requirement for the Proposed 94-credit Applied Bachelor's in Healthcare Administration and Innovation

Overview and Logistics

Given the applied nature of this degree, the required internship ensures that every student gains hands-on, supervised experience in a healthcare setting, allowing them to integrate academic learning with real-world practice.

HLTH-300: Healthcare Administration Internship

Credits: 3

Duration: 120 minimum on-site hours

Prerequisites

Prerequisite for: HLTH Capstone Course

Site Selection and Approval

Internships may be conducted in partnership with a broad set of approved healthcare organizations, including but not limited to:

- Hospitals and integrated health systems
- Community health centers
- Long-term care and rehabilitation facilities
- Public health departments
- Healthcare consulting firms
- Health insurance providers
- Behavioral health organizations
- Biotech and healthcare startups

All internship placements must be approved by the HLTH-300 faculty instructor, and confirmed by the submission of a learning agreement signed by the student, site supervisor, and the instructor.

Modality

All internships will be conducted **in person**, with limited exceptions for hybrid models that include clearly defined and approved remote project components. Remote-only internships are not permitted unless extraordinary circumstances are approved by the Department Chair.

Timing

Students can complete their internship requirement any time after their first year and before their final semester, with a suggested timing in their second year of the three-year program. HLTH-300 will be offered Fall and Spring semesters, with opportunities for students to complete their internship during the summer.

Supervision Requirements

Each internship site must designate a qualified **Site Supervisor** who:

- Has at least 3 years of experience in a healthcare administrative or supervisory role
- Provides direct mentorship, training, and weekly check-ins with the intern
- Completes a formal end-of-internship assessment of the student's workplace performance through the Suitable/NACE evaluation tool

Support for Securing Internships

Given its location, history, and recent investments in career-related staffing and resources, Suffolk is well-positioned to support all students in identifying and securing internships that fulfill the program's academic and professional objectives. The Assistant Director of the [Healthcare and Wellness Career Community](#) will serve as a dedicated liaison for students pursuing careers in healthcare administration and innovation, this role provides one-on-one advising and structured guidance on internship search strategies, timelines, and readiness, in close collaboration with faculty in the Department of Healthcare Administration. This advisor, supported by their colleagues in and the resources of the Center for Career Equity, Development & Success, works closely with recruiters, alumni, and industry leaders in the healthcare sector to identify and support pipelines for internships and full-time hires.

Students will have structured support through each phase of the internship process; from clarifying their interests and goals, to preparing application materials, to identifying and applying to targeted opportunities. The timing of the internship within the program structure is flexible; students who do not secure a position on their first attempt will have continued access to additional advising, tailored support, and an expanded search window, ensuring that all students are able to meet the internship requirement.

Suffolk's location in downtown Boston offers students a broad and consistent supply of internship opportunities across clinical, community-based, public, and private sector healthcare organizations. In addition, the university maintains robust employer partnerships and a strong alumni network in the region, bolstered by decades of collaboration with leading healthcare organizations through our established Master of Healthcare Administration program. These relationships provide both direct opportunities and indirect referral pipelines for undergraduate students seeking internship placements.

While individual internships may not always reflect a student's precise post-graduation setting, placements are selected to ensure alignment with core healthcare administration competencies and to offer meaningful, supervised experiences that support both academic integration and professional development. The program's structure, staffing, and institutional partnerships ensure that internship placement will be feasible for all eligible students throughout the academic year.

Internship Learning Goals and Assessments

The internship requirement is designed to achieve the following learning outcomes:

1. Apply healthcare administration knowledge in real-world contexts

Students will apply theories, tools, and concepts from healthcare administration coursework to real-world challenges, supporting daily operations and contributing to decision-making within a healthcare organization.

Assessment:

- Supervisor evaluation: Supervisor indicates student met or exceeded expectations in the behavior-based assessment questions correlated with critical thinking, professionalism, communication, and teamwork.
- Reflection assignment: Student clearly connects specific tasks and responsibilities to relevant academic concepts and frameworks, demonstrating applied understanding.

2. Demonstrate ethical, inclusive, and culturally competent practice

Students will recognize and navigate ethical challenges, model professional conduct, and collaborate effectively across lines of race, culture, socioeconomic status, and professional background in healthcare environments.

Assessment:

- Supervisor evaluation: Supervisor indicates student met or exceeded expectations in the behavior-based assessment questions correlated with equity & inclusion and professionalism.
- Reflection assignment: Student thoughtfully discusses how awareness of their own and others' social identities shaped their workplace interactions and contributed to culturally competent, equity-minded practice.

3. Communicate and collaborate effectively in professional teams

Students will communicate clearly and professionally in both interpersonal and formal contexts and contribute effectively to collaborative teams involving diverse stakeholders within a healthcare setting.

Assessment:

- Supervisor evaluation: Supervisor indicates student met or exceeded expectations in the behavior-based assessment questions correlated with communication and teamwork.
- Reflection assignment: Student analyzes how collaboration with professionals from diverse roles shaped their understanding of effective teamwork, including listening, adapting communication styles, and managing conflict.

4. Reflect on career fit and professional growth through experiential learning

Students will assess their skills, values, and goals in relation to the healthcare management profession, and articulate how their internship experiences inform their ongoing career development.

Assessment:

- Student's self-evaluation: Student provides a reflective and evidence-based assessment of their skills and growth, demonstrating alignment between self-perception and supervisor feedback.
- Reflection assignment: Student meaningfully reflects on how the internship confirmed, challenged, or refined their professional interests, and outlines next steps in their career development strategy.

Student Expectations and Deliverables

In addition to successfully completing a minimum of 120 hours of supervised work at their internship site, students enrolled in the Healthcare Management internship will engage in a structured set of deliverables designed to ensure academic integration, professional development, and measurable learning outcomes.

Learning Contract

At the outset of the internship, students will complete a Learning Contract in collaboration with their site supervisor and HLTH-300 faculty instructor. This document will articulate individualized learning goals tied to the program's defined learning outcomes and to the core competencies of healthcare administration. The contract establishes a shared understanding of expectations and serves as a basis for end-of-experience evaluation and reflection.

Supervisor Evaluation and Self-Evaluation

To assess professional development and behavioral growth, students and their supervisors will both complete a validated internship evaluation tool developed by Suitable, a nationally recognized career readiness platform. This instrument assesses demonstrated behaviors aligned with the eight NACE Career Readiness Competencies, including communication, critical thinking, equity & inclusion, and teamwork. The triangulation of student self-assessment and supervisor evaluation provides meaningful insights into growth areas and readiness for the workplace.

Post-Internship Reflection Essay

Upon completion of the internship, students will submit a reflective essay that synthesizes their experience. The reflection will address how they:

- Applied academic concepts in a real-world healthcare setting
- Engaged ethically and inclusively with diverse stakeholders
- Contributed to professional teams and navigated interpersonal dynamics
- Evaluated their own growth, strengths, and areas for improvement
- Reflected on career fit and clarified future goals within the field of healthcare management

This combination of workplace experience, structured goal setting, validated competency assessment, and critical reflection ensures that the internship is a high-impact, academically grounded learning experience that meets both institutional standards and national best practices for experiential education.

Risk Management and Student Support

Suffolk University maintains robust risk management protocols and student protections to ensure that internship placements are safe, compliant, and educationally appropriate. These procedures are coordinated jointly by the Career Center, the Office of Risk Management, and relevant academic departments.

Mandatory Pre-Placement Training

All students must complete HIPAA training, Title IX and sexual misconduct prevention training prior to beginning their internship. These trainings ensure students understand their rights, responsibilities, and best practices for working in regulated environments, particularly within healthcare settings.

Site Vetting and Compliance

All internship sites are reviewed and approved by Suffolk University staff to ensure compliance with state and federal labor laws, including proper classification under the Fair Labor Standards Act. Sites must provide a safe work environment, appropriate supervision, and meaningful educational value aligned with the student's learning goals.

Liability Coverage

Suffolk University includes internship-related liability insurance in its institutional coverage plan. This protects both the student and the University in the event of an incident or injury during an approved internship experience.

Procedures for Student Concerns

Students who experience harassment, discrimination, unsafe conditions, or other significant concerns at their internship site will have the training and resources required to report the issue promptly to the Career Center or HLTH-300 faculty member. In such cases, students may request reassignment or withdrawal from the site without academic penalty, and the university will respond in accordance with established Title IX and student safety protocols.

Ongoing Monitoring and Support

Throughout the internship period, students remain in regular contact with their HLTH-300 faculty member, ensuring ongoing monitoring and a direct line of support. Site supervisors are also provided with clear expectations and a point of contact at the university in the event of questions or concerns.

Together, these safeguards reflect Suffolk University's commitment to student well-being, legal compliance, and educational quality across all internship placements, with particular attention to the regulatory and ethical demands of healthcare environments.

Appendix F: Program Faculty

In cases where the match between the faculty member's field of expertise and the proposed program is unclear, additional information on qualifications may be requested.

Name <i>If faculty member has not yet been hired, write: Not Yet Hired.</i>	Degree and Field	Title	Indicate full-time or part-time faculty status in the proposed program
Example: Apple, Thomas	Ph.D. in Criminal Justice	Assistant Professor	Full-time
Al-Amin, Mona	Ph.D. in Risk, Insurance, and Healthcare Management	Associate Professor	Full-time
Martelli, Peter	Ph. D. in Health Services and Policy Analysis	Associate Professor	Full-time
Agnew, Jim	MBA, working professional in the healthcare field	Lecturer	Part-time
Hao, Yan	Master's Healthcare Administration, working professional in the healthcare field	Lecturer	Part-time
Serpico, John	MBA, working professional in the healthcare field	Lecturer	Part-time
Motl Taylor, Ann	Master's Healthcare Administration, working professional in the healthcare field	Lecturer	Part-time

Appendix G: Budget Projections

This appendix contains a comparison of financial projections comparing the costs and revenues of starting a new 3-year program with starting a new 4-year program over the initial five years of the program, if both programs have the same enrollment and retention rates. We consider both a low enrollment option (10 students) and a high enrollment option (30 students). In the low enrollment case, the projection for year 2 of the program is an enrollment increase to 20 students per year over the next four years of the program. In the high enrollment case, we assume a steady enrollment of 30 students over the initial five years of the program.

Retention projections were based on an average of historical retention and graduation data (from 2015-2018). These projections assume that all students graduate in the standard time frame for the degree, either three or four years, though based on the same historical data, roughly 10% of Suffolk students will require additional time to earn their degree.

Predicted Retention and Persistence	
Year 1 to 2	74.3%
Year 2 to 3	64.4%
Year 3 to 4	59.4%

These budget projections were made using the current predicted trends in tuition, aid, and compensation.

Table G.1: Budget Projections for a 94-Credit Program, Initial Enrollment of 10 Students

Table G.2: Budget Projections for a 124-Credit Program, Initial Enrollment of 10 Students

Table G.3: Budget Projections for a 94-Credit Program, Initial Enrollment of 30 Students

Table G.4: Budget Projections for a 124-Credit Program, Initial Enrollment of 30 Students

Table G.1: Budget Projections for a 94-Credit Program, Initial Enrollment of 10 Students

3 year					
	FY 2027 (Year)	FY 2028 (Year+1)	FY 2029 (Year+2)	FY 2030 (Year+3)	FY 2031 (Year+4)
3 year Program					
Enrolled Fall or Spring (Year)	10	7	6	-	-
Enrolled Fall or Spring (Year+1)	-	20	15	13	-
Enrolled Fall or Spring (Year+2)	-	-	20	15	13
Enrolled Fall or Spring (Year+3)	-	-	-	20	15
Enrolled Fall or Spring (Year+4)	-	-	-	-	20
Total 3 year Program	10	27	41	48	48
Tuition revenue	489,260	1,373,841	2,169,638	2,641,680	2,747,328
Scholarship aid	(303,341)	(824,305)	(1,258,390)	(1,479,341)	(1,538,504)
Net tuition revenue	185,919	549,536	911,248	1,162,339	1,208,824
Compensation	15,000	15,000	15,000	15,000	15,000
Comp - Adjunct expense	-	-	34,399	71,558	111,633
Marketing	200,000	150,000	50,000	50,000	50,000
Program expenses	5,000	5,000	5,000	5,000	5,000
	220,000	170,000	104,399	141,558	181,633
Operating surplus/(deficit)	(34,081)	379,536	806,849	1,020,781	1,027,191
fixed	215,000	165,000	65,000	65,000	65,000
revenue per student	18,592	20,353	22,226	24,215	25,184
variable per student	500	185	961	1,595	2,430
Fixed / Rev-Var	12	8	3	3	3

Table G.2: Budget Projections for a 124-Credit Program, Initial Enrollment of 10 Students

4 year					
	FY 2027 (Year)	FY 2028 (Year+1)	FY 2029 (Year+2)	FY 2030 (Year+3)	FY 2031 (Year+4)
3 year Program					
Enrolled Fall or Spring (Year)	10	7	6	5	-
Enrolled Fall or Spring (Year+1)	-	20	15	13	12
Enrolled Fall or Spring (Year+2)	-	-	20	15	13
Enrolled Fall or Spring (Year+3)	-	-	-	20	15
Enrolled Fall or Spring (Year+4)	-	-	-	-	20
Total 3 year Program	10	27	41	53	60
Tuition revenue	489,260	1,373,841	2,169,638	2,916,855	3,434,160
Scholarship aid	(303,341)	(824,305)	(1,258,390)	(1,633,439)	(1,923,130)
Net tuition revenue	185,919	549,536	911,248	1,283,416	1,511,030
Compensation	15,000	15,000	15,000	15,000	15,000
Comp - Adjunct expense	-	-	34,399	71,558	111,633
Marketing	200,000	150,000	50,000	50,000	50,000
Program expenses	5,000	5,000	5,000	5,000	5,000
	220,000	170,000	104,399	141,558	181,633
Operating surplus/(deficit)	(34,081)	379,536	806,849	1,141,858	1,329,397
fixed	215,000	165,000	65,000	65,000	65,000
revenue per student	18,592	20,353	22,226	24,215	25,184
variable per student	500	185	961	1,444	1,944
Fixed / Rev-Var	12	8	3	3	3

Table G.3: Budget Projections for a 94-Credit Program, Initial Enrollment of 30 Students

3 year					
	FY 2027 (Year)	FY 2028 (Year+1)	FY 2029 (Year+2)	FY 2030 (Year+3)	FY 2031 (Year+4)
3 year Program					
Enrolled Fall or Spring (Year)	30	22	19	-	-
Enrolled Fall or Spring (Year+1)	-	30	22	19	-
Enrolled Fall or Spring (Year+2)	-	-	30	22	19
Enrolled Fall or Spring (Year+3)	-	-	-	30	22
Enrolled Fall or Spring (Year+4)	-	-	-	-	30
Total 3 year Program	30	52	71	71	71
Tuition revenue	1,467,780	2,645,916	3,757,178	3,907,485	4,063,756
Scholarship aid	(910,024)	(1,587,550)	(2,179,163)	(2,188,192)	(2,275,703)
Net tuition revenue	557,756	1,058,366	1,578,015	1,719,293	1,788,053
Compensation	15,000	15,000	15,000	15,000	15,000
Comp - Adjunct expense	-	-	34,399	71,558	111,633
Marketing	200,000	150,000	50,000	50,000	50,000
Program expenses	5,000	5,000	5,000	5,000	5,000
	220,000	170,000	104,399	141,558	181,633
Operating surplus/(deficit)	337,756	888,366	1,473,616	1,577,735	1,606,420
fixed	215,000	165,000	65,000	65,000	65,000
revenue per student	18,592	20,353	22,226	24,215	25,184
variable per student	167	96	555	1,078	1,643
Fixed / Rev-Var	12	8	3	3	3

Table G.4: Budget Projections for a 124-Credit Program, Initial Enrollment of 30 Students

4 year					
	FY 2027 (Year)	FY 2028 (Year+1)	FY 2029 (Year+2)	FY 2030 (Year+3)	FY 2031 (Year+4)
3 year Program					
Enrolled Fall or Spring (Year)	30	22	19	18	-
Enrolled Fall or Spring (Year+1)	-	30	22	19	18
Enrolled Fall or Spring (Year+2)	-	-	30	22	19
Enrolled Fall or Spring (Year+3)	-	-	-	30	22
Enrolled Fall or Spring (Year+4)	-	-	-	-	30
Total 3 year Program	30	52	71	89	89
Tuition revenue	1,467,780	2,645,916	3,757,178	4,898,115	5,094,004
Scholarship aid	(910,024)	(1,587,550)	(2,179,163)	(2,742,944)	(2,852,642)
Net tuition revenue	557,756	1,058,366	1,578,015	2,155,171	2,241,362
Compensation	15,000	15,000	15,000	15,000	15,000
Comp - Adjunct expense	-	-	34,399	71,558	111,633
Marketing	200,000	150,000	50,000	50,000	50,000
Program expenses	5,000	5,000	5,000	5,000	5,000
	220,000	170,000	104,399	141,558	181,633
Operating surplus/(deficit)	337,756	888,366	1,473,616	2,013,613	2,059,729
fixed	215,000	165,000	65,000	65,000	65,000
revenue per student	18,592	20,353	22,226	24,215	25,184
variable per student	167	96	555	860	1,310
Fixed / Rev-Var	12	8	3	3	3

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Innovation Proposal Completeness Review — Suffolk University
Applied Bachelor of Science in Healthcare Administration and Innovation

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	☒	Met	Standard 1, p. 7	Met
Massachusetts-based institution with physical presence in the Commonwealth for a minimum of six consecutive years	☒	Met	Standard 1, p. 7	Met
Operated continuously by the same governing entity for a minimum of six consecutive years	☒	Met	Standard 1, p. 7	Met
Not under any investigation or corrective action by the Commonwealth, federal government, or relevant oversight bodies	☒	Met	Standard 1, p. 7	Met
Application Requirements (610 CMR 16.05)				
Payment of Required Fees	☒	Incomplete. Invoice created to request payment.	Payment received on May 26, 2026	Met
LOI Requirements (610 CMR 16.06 and 16.07)				
Demonstrate the institution's eligibility under Section 16.04	☒	Met	Standard 3, p. 17	Met
Identify where the proposed initiative may be inconsistent with Board regulation(s) or policies, and confirm consistency with all other applicable regulations	☒	Note: p. 14 will need to be updated to reflect current status	Standard 3, p. 17; Executive Summary, p. 1	Met (initial page 14, identified on page 17 of updated proposal)
State the purpose and intent of the initiative and the intended innovation it is intended to advance	☒	Met	Standard 1, pp. 7–10; Executive Summary, pp. 1–4	Met

Provide converging evidence to support there is a problem to be solved through innovation	☒	Met	Standard 1, pp. 8–10; Standard 2, pp. 11–14;	Met
Provide evidence to support efficacy of proposed innovation, including analysis of experiences of other institutions offering similar proposals	☒	Met	Standard 1, pp. 8–9; Table 1.1, p. 9; Standard 2, pp. 13–14	Met
Confirm and describe how the initiative is consistent with the institution's mission	☒	Met	Standard 1, pp. 7–8, 10; Standard 2, p. 11	Met
Describe how the initiative fulfills a demonstrated need and/or provides one or more defined benefits to existing or potential students	☒	Met	Standard 2, pp. 11–14; Standard 5, pp. 23–24; Executive Summary, pp. 1–4	Met
Include an analysis of the proposal's alignment with academic and workforce needs	☒	Additional information needed. Provided: information on regional/statewide labor market; provide evidence including references to workforce development plans (e.g. MassHire Regional Blueprints) showing market need and market research.	Standard 2, pp. 11–13 (BLS, Projections Central, MassHire Blueprint citations 11–15); Executive Summary, p. 1–2	Met - Addressed in Standard 2, pp. 11–13.
Demonstrate the financial, human, physical, information, and technological resources required for the pilot and evidence of sufficient resources to begin and sustain the initiative	☒	Met	Standard 7, pp. 26–29; Appendix G, pp. 64–68	Met
Identify potential risks to students and present risk mitigation strategies	☒	Risks identified: (1) Core curriculum under review; (2) Students transferring will only get 2 courses credited toward the major; (3) Students internally transferring to a major outside SBS may require additional time; (4) Depth of learning outcomes relative to traditional programs (p. 18); (5) Federal aid eligibility post-graduation (p. 20).	Standard 4, pp. 18–19 (internal transfer, residency); Standard 5, pp. 23–24 (federal aid, transition); Standard 9, pp. 32–34 (disclosure statement); Standard 4, p. 18 (pre-matriculation credits, AP, IB, CLEP, military, dual enrollment)	Met – Addressed in Standard 4 (pp. 18–19), Standard 5 (pp. 23–24), and Standard 9 (pp. 32–34).

		Clarifications needed: Pre-matriculation credit articulation (dual enrollment, Early College, AP, military credit, credit by examination, PLA) not fully addressed.		
Address degree or certificate nomenclature, ensuring clarity and avoiding confusion with other programs	☒	Will use the nomenclature Applied Bachelor in Healthcare Administration and Innovation	Standard 9, p. 32; Executive Summary, p. 4; Disclosure Statement, p. 34	Met
Provide proposed marketing materials with clear and conspicuous disclosures, including pilot nature and cost	☒	Met	Standard 9, pp. 32–34; Proposed Disclosure Statement, pp. 34	Met
Describe how the institution intends to secure informed consent of students participating in the pilot program	☒	Incomplete — 'Advisors will also counsel students on the implications of the degree for graduate school or employment.' (p. 20). Formal disclosure statement does not mention whether a student's signature is required.	Standard 9, p. 32; Disclosure Statement, p. 34 (affirm electronically or in writing at time of major declaration)	Met – Addressed in Standard 9, p. 32 and p. 34.
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)	☒	Met	Executive Summary, pp. 3–4; Standard 8, pp. 30–31	Met
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	☒	Met	Standard 8, pp. 30–31; Standard 2, p. 13	Met
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	☒	Met	Standard 3, pp. 15–17	Met

administrative and fiduciary control over the initiative, including academic programming (16.06(2)(c))				
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))	☒	Met	Standard 4, pp. 18–22; Standard 6, p. 25; Standard 8, pp. 30–31; Appendix B, p. 41	Met
Additional LOI Requirements				
Proposals should describe how the institution will ensure equitable access for all students to educational experiences within the context of the innovation initiative	☒	Met	Standard 5, p. 23; Executive Summary, p. 1	Met
If proposing an undergraduate degree program, describe the general education requirement, including its goals and outcomes	☒	Met	Standard 4, pp. 18–21; Appendix C, pp. 47–51; Executive Summary, p. 2	Met
If a degree program, include procedures and arrangements for independent work, paid or unpaid internships, or clinical placements, if applicable	☒	Additional information needed: No information included about whether internships are paid or unpaid.	Standard 4, p. 22; Appendix E, pp. 58–62; Executive Summary, p. 2 (paid internships anticipated; Summer Career Development Stipend for students unable to secure paid placement)	Met – Addressed in Standard 4, p.22 and Appendix E, pp. 59-62.
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.	Appendix F, p. 63 (faculty table with degrees and titles provided; full Faculty Form for instructional staff to be submitted separately)	Met – Suffolk noted three full-time faculty and four part-time faculty supporting the program.

Name/Affiliation	Comments	Response
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.
James Pearson, Professor and Chair of the Philosophy Department, Bridgewater State	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.	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, we 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.
Kevin Young, Associate Professor of History, UMass Amherst	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	The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.

<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. 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 our review, we 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 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 our review, we 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</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>

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 our review, we 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.

<p>Siobhan Mei, Lecturer, Manning College of Information and Computer Science, UMass Amherst</p>	<p>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.</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 our review, we 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>
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Kim MacInnis, Chair and
Professor of Sociology,
Bridgewater State

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."

Please see response to Comment #3 and response to Comment #9.

Melissa LaBelle, Visiting Assistant Professor of Secondary Education & Educational Leadership, Bridgewater State University

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.

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 our review, we 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.

Diana Fox, Professor &
Chair, Anthropology
Department, Bridgewater
State University

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.

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,
we 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.

Seth Meyer, Canton, MA

Generally opposed-will create two-tier system and make students less competitive in job market with a lack of a well-rounded education

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>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 our review, we 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>
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Melissa, Winchell,
Associate Professor,
Secondary Education &
Educational Leadership,
Bridgewater State
University

Generally opposed-would weaken bachelor's degree in MA,
would create a two-tier education system

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 seeks 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 our review, we 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>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 our review, we 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>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>

Daniel Price, Professor of
Criminal Justice,
Westfield State University

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."

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 our review, we 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 comments #3 on financial barriers.

James E. Leone,
Professor, Department of
Health and Kinesiology,
Bridgewater State
University

Expressed formal opposition specifically to Suffolk's proposed applied bachelor's in Healthcare Administration as an educator and medical provider-fails to meet regulatory standards for innovation and consumer protection and fails to prepare students for continued study or high level occupations, stripped down degree will leave students with gaps in knowledge, in a "closed loop-forced to remain at Suffolk for graduate study because their undergraduate credits are not transferable elsewhere." Creates long-term financial and professional risks for most vulnerable students and is an "unproven experiment on students, trading academic substance for enrollment growth."

Please see response to Comment #9. Further, the proposed pilot program was approved by Suffolk's external accreditor (NECHE) pending BHE approval through NECHE's innovation pathway.

Justin L. Golub, Biology
Department Chair, MCLA

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.

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 our review, we 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>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 should 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 our review, we 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 comments #2 and comments #4 on financial barriers.</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.</p>	<p>Please see response to Comment #3.</p>

Rachel Trousdale,
Professor of English,
Framingham State
University

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."

Please see response to Comment #3 regarding financial barriers. Further, 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, we will apply these guiding principles alongside our 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.

<p>Cynthia Prehar, Framingham, MA</p>	<p>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.</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 our review, we 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>John Dempsey, Westfield State University</p>	<p>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."</p>	<p>The general opposition expressed in the comment is noted.</p>

Catherine Benincasa, West Hatfield, MA	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	The general opposition expressed in the comment is noted. Also see Comment #21.
Jane Sancinito, Associate Professor of History, University of Massachusetts-Lowell	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"	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 our review, we 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 comments #2 and comments #4 on financial barriers.

<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. 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, we 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.</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 #27.</p>

Lynn Shelley, Professor and Chair, Westfield State University	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!"	The general opposition expressed in the comment is noted.
Aruna Krishnamurthy, Professor of English, Fitchburg State University	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.”	The general opposition expressed in the comment is noted.

Patrick Young, Associate
Professor of History,
UMass Boston

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."

The general opposition expressed in the comment is noted.

<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>

Amy Springer, Amherst, MA	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.	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.
Evelyn Perry, Professor, English Department, Framingham State	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.	Please see response to Comment #3.

Nancy Herman-Centers,
Day Lecturer, English
Dept, Bridgewater State
University

“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.”

Please see response to Comment #3.

Joya Misra, Distinguished
Professor, Department of
Sociology & Public Policy,
UMass Amherst

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.

Please see response to Comment #3.

<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 Higher Education's Degree Regulations for Pilot Proposals on Innovation.</p>

<p>Kate Ashworth, Atteboro 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. Ultimately will lead to a two-tiered education system causing harm to students who can least afford</p>	<p>Please see response to Comment #3.</p>

Lisa Bergson, Associate Professor, Public Relations, Bridgewater State University

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.”

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, we 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.

<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 Proposals on Innovation.</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. 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 degrees.</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. We further recognize 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, we will
apply these guiding principles alongside our 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 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.

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 our review, we 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. We aim 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 students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic standards.

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 our review, we 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 our review, we 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>Daniel Mulcare, President, Salem Chapter, Massachusetts State College Association, Professor, Politics, Policy, and International Relations Department, Salem State University</p>	<p>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."</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 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 our review, we 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>
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<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 our review, we 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>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 the rigor or scope of what students are expected to know and be able to do.</p>

Rachelle A Dermer,
Associate Professor, Film
and Video, Fitchburg
State University

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."

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 problem-solving in ways that complement, and in some cases enhance, traditional classroom-based learning.

<p>Olivia Rossetti, Associate Librarian, Fitchburg State University</p>	<p>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."</p>	<p>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>
<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 our review, we 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>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 the rigor or scope of what students are expected to know and be able to do.</p>
<p>Mahmoud El-Hashash, Bridgewater State University</p>	<p>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.</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Steve Greenberg, Bridgewater State University</p>	<p>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."</p>	<p>The general opposition expressed in the comment is noted.</p>

<p>Reid Parsons, Professor of Environmental, Geographic & Public Health Sciences, Fitchburg State University</p>	<p>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.</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.</p>
<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 the rigor or scope of what students are expected to know and be able to do.</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>

Matthew Savage, Performing Arts Professor, Bunker Hill Community College	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.	The general opposition expressed in the comment is noted.
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 #3 and Comment #9.

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 recognize that thoughtfully designed reduced-credit pathways can expand access to high-quality applied baccalaureate degrees without compromising academic standards. 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, 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 distinction lies in curricular design, not in the rigor or scope of what students are expected to know and be able to do.

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 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 our review, we 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.

Glynn Lloyd, President and Founder, City Fresh Foods

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."

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. We expect 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 thinking and problem-solving in ways that complement, and in some cases enhance, traditional classroom-based approaches.

<p>Todd C. Harris, Associate Professor of Management, Bridgewater State University</p>	<p>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."</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. We expect 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 thinking and problem solving in ways that complement, and in some</p>
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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 our review, we 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 #81 through Comment #176.

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, we 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.

Jakari Griffith, Associate
Professor of
Management,
Bridgewater State
University

As an educator, academic administrator, citizen, and taxpayer, I 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.

<p>Rebecca Metcalf, Professor of Mathematics, Bridgewater State University</p>	<p>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."</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. 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 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</p>
<p>Steven Edwards, Professor, English Studies, Fitchburg 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 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.</p>

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, we will apply these guiding principles alongside our 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 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

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, 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 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.

Emelia Cooper, Senior
Academic Advisory,
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. 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. 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 careful testing of innovations designed to improve postsecondary student experiences.

Taylor Hall, Associate Professor, School of Social Work, 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. 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, we will apply these guiding principles alongside our 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 our review, we also expect pilot proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education. This approach helps ensure that

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 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. 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 #71) - "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 #71.</p>

Asha Nadkarni, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See #71) - "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 #71.
Nicole LeBlanc, Leominster Public Schools	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See #71) - "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 #71) - "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 consistant with NECHE naming and distinction guidance.
William Hibbard, East Sandwich, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See #71) - "Lowered expectations will yield lowered outcomes."	Please see response to Comment #71.
Mary Kate Keyes, UMass Lowell	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See #71) - "Diminishing the number of credits needed to earn a bachelor's degree diminishes the value of this degree."	Please see response to Comment #71.
MSP Kurland, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See #71) - "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 #71.

Limari Rivera, Fitchburg, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See #71) - "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.
Carol Sharick, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See #71) - "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."	Please see response to Comment #71.
Teresa Cheung, Salem, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See #71) - "Why create a underclass of poorly educated people? This will widen the skills gap exacerbate social and economic disparities."	Please see response to Comment #71.
Kelly Morgan, Fitchburg State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts"petition (See #71) - "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."	Please see response to Comment #71.

<p>Joya Misra, UMass Amherst</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.</p>
<p>Lisa Gim, Fitchburg State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71. Further, Per Section 16:06 (2e), the proposal speaks to nomenclature and is consistant with NECHE naming and distinction guidance.</p>
<p>Lanier Sammons, Maynard, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "90-credit degrees make use a less educated populace, reduce economic mobility, and cut the heart of higher education in the process."</p>	<p>Please see response to Comment #71.</p>
<p>Margaret Johnson, Bridgewater State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "This is hugely concerning. Do we want graduates who are less prepared for this complex world?"</p>	<p>Please see response to Comment #71.</p>

Rebecca Bailey, Reading, Submitted via "Protect the Value of the Baccalaureate Degree in Please see response to Comment #71.

MA

Massachusetts" petition (See #71) - "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."

Cheryl Luongo, Melrose,
MA

Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.

<p>Jen Meagher, Amesbury, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "Invest in education and our collective future. Stop feeding this horrendous gap in haves and have nots. What a terrible world we are creating."</p>	<p>The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.</p>
<p>Avon Lewis, Arlington, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "I am appalled at this plan. If you want to offer a three year degree, offer it, but it is not a bachelors. "</p>	<p>Per Section 16:06 (2e), the proposal speaks to nomenclature and is consistent with NECHE naming and distinction guidance.</p>
<p>Kevin McCarthy, Fitchburg State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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"</p>	<p>Please see response to Comment #71.</p>

<p>Mahmoud El hashash, Quincy, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71.</p>
<p>Paul Fredette, Bridgewater State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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. "</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Katie Dube Vaughn, Tyngsborough, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "Please do not accept 90 degree bachelor credit for educators."</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Gail Marrella, Bridgewater State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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. "</p>	<p>Please see response to Comment #71.</p>

<p>John Sylvia IV, Worcester, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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! "</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Linda LeBlanc, Winchendon, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71.</p>
<p>Lisette Espinoza, Amesbury, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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. "</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Lorenz Glaser, West, Newton, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.</p>

Deborah Henson, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.
Sarah Fisher, Lowell, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71) - "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 #71) - "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 #71.
Noreen Mitchell, Burlington, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "Please protect the value of a bachelors degree and do not water down the requirements of earning one. "	Please see response to Comment #71.
Christopher Maggio, New Bedford, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71) - "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 #71) - "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 #71) - "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 #71) - "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 #71. 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 #71) - "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 #71.

<p>Rala Cocco, Fitchburg, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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. "</p>	<p>Please see response to Comment #71.</p>
<p>Brian Payne, Kingston, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.</p>
<p>Halcyon Mancuso, Newton, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71) - "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 #71.</p>

<p>Patricia Bowers, West Bridgewater, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "Please do not water down qualifications for teaching degrees in MA."</p>	<p>Please see response to Comment #71.</p>
<p>Marianna Ritchey, Greenfield, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.</p>
<p>Siobhan Mei, UMass Amherst</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71.</p>
<p>Bethany Hall, Bridgewater State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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!"</p>	<p>Please see response to Comment #71.</p>

John Gambino, Beverly, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.
Anna Penner, UMass Boston	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "Please don't diminish students education. They and later generations will suffer for it. "	The general opposition expressed in the comment is noted.
Chalet Seidel, East Hampton, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."	The general opposition expressed in the comment is noted.

<p>Lynn Shelley, Florence, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.</p>
<p>Daniel Welsh, Fitchburg State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.</p>
<p>Sarah Buttenwieser, Northhampton, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "Please keep education valuable and fund it so it's viable."</p>	<p>The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.</p>

<p>Jason Hyatt, East Falmouth, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "I oppose 90 credit bachelor degrees. Instead, make associates degrees available outside of community college."</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Erika Briesacher, Auburn, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71.</p>
<p>Ellen Martins, Westford, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "Massachusetts should lower financial barriers, not expectations. I strongly oppose the 3 year baccalaureate degree."</p>	<p>The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.</p>
<p>Kristen Sonntag, Bridgewater State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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!"</p>	<p>Please see response to Comment #71.</p>

<p>Rob Lorenson, Middleboro, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.</p>
<p>Heather Urbanski, Fitchburg, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71. 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 #71) - "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 #71) - "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 #71) - "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 #71.</p>

<p>Shanadeen Begay, Ayer, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71.</p>
<p>Morgan Grey, Centerville, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>The comment concerning funding is beyond the scope of the proposal; the general opposition is noted.</p>
<p>Robert Maloney, Massachusetts College of Art & Design</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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. "</p>	<p>Please see response to Comment #71.</p>
<p>Randi Zanca, Northbridge, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71.</p>

Jeb Booth, Salem State University	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."
Jane Sancinito, Lowell, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "This is a terrible idea that will continue to devalue BA degrees with employers"

<p>Paul Johansen, Pittsfield, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71.</p>
<p>Regina Daus-Haberle, Lexington, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71.</p>
<p>Susanne Chuku, Longmeadow, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71.</p>
<p>Patrick Young, UMass Lowell</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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. "</p>	<p>Please see response to Comment #71.</p>

Paulina Borrego, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.
Chris Weeks, Greenfield, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.
Julie Boss, Jamaica Plain, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.
Rachel Trousdale, Belmont, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.
Laura Vish, West Roxbury, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71) - "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 #71. 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 #71) - "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 #71.

Betsy Miller, Salem, MA

Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71) - "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 #71.
Jennifer McGrath, West Springfield, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.
Nancy Herman-Centers, Brockton, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.
Carolyn Villanova, Pittsfield, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "I am a retired teacher. "	The general opposition expressed in the comment is noted.

<p>Matt Greene, Bridgewater State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "College is more than training for a job. Students should take more courses to become well-rounded, empathetic people. "</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Jo Ann Florek, Westfield, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."</p>	<p>Please see response to Comment #71.</p>
<p>Sandra Rothenberg, Framingham State University</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "This is detrimental for students and everyone and everything at Massachusetts State Universities."</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Stephanie Cardon, Massachusetts College of Art & Design</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "This is a race to the bottom. We are already undereducating compared to other countries. "</p>	<p>The general opposition expressed in the comment is noted.</p>
<p>Kerry Costello, Boston, MA</p>	<p>Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "Do Not water down our Degree requirements! We can do better than that!!!!!!!!!"</p>	<p>Please see response to Comment #71.</p>

Diana Fox, Bridgewater
State University

Submitted via "Protect the Value of the Baccalaureate Degree in
Massachusetts" petition (See #71) - "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 #71.

Stephen Russell,
Pepperell, MA

Submitted via "Protect the Value of the Baccalaureate Degree in
Massachusetts" petition (See #71) - "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 #71.

Heather Reed, UMass Amherst	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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."
Carole Bott, Framingham, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "As a retired teacher who was also an adjunct professor, please do not sacrifice the intellectual integrity of a college education. Thank you. "
Jennifer Sherman, Hingham, MA	Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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?"

Ivana George,
Bridgewater State
University

Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.

Margarita Perez,
Worcester State
University

Submitted via "Protect the Value of the Baccalaureate Degree in Massachusetts" petition (See #71) - "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 #71.

Zachary Lee, Film &
Video Coordinator,
Fitchburg State University

Strongly opposed to both reduced credit bachelor proposals. Argues that the proposal respond to the cost of education but ignore the actual value proposition of higher education. Contends that many student 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.

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 our review, we 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

Irina Seceleanu,
Professor of
Mathematics,
Bridgewater State
University

Submitted a four page document opposing Suffolk's proposal for a 94-credit applied bachelor's degree in Healthcare Administration and Innovation. Noted curricular gaps and non-equivalences between traditional programs and the proposed pilot program, concerns for students transitional pathways in and out of the proposed pilot program and that the assurance of "any time" was unexamined, and that the cheaper credential is targeted at the student who can least afford the hidden costs.

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. Furthermore, 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. The Innovation Regulation enables institutions to explore these approaches in a structured and controlled manner, supporting the careful testing of innovations designed to improve postsecondary student experiences.

<p>Joseph Nardoni, Professor of English and Creative Writing, Middlesex Community College</p>	<p>Strongly opposed - Argues that the proposed program is "structured to hide its marketing focus and other drawbacks, among wich are defining students as customers or consumers, and their education as a commodity." Contends that the program is designed to primarily meet the needs of the for-profit health care industry rather than preparing students to critically examine or improve healthcare systems.</p>	<p>The pilot framework is designed to ensure that new models are tested carefully, evaluated rigorously, and advanced only when they demonstrably serve students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic integrity. Pilot programs submitted to the Board are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. As part of our review, we expect proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education, helping to ensure that students remain competitive across a range of post-completion pathways. 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 recognize the value of incorporating high-impact practices—such as project-based learning, internships, and employer-aligned experiences—which can deepen critical thinking and problem-solving skills and complement, and in some cases enhance,</p>
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George Kalogeris,
Professor Emeritus,
Suffolk University

Strongly opposed - States that there is no advantage for the students or the University's reputation.

We 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 our review, we 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.

Joseph Adelman

Strongly opposed - Argues that it would diminish the value of a bachelor's degree and would create a two-tiered system in which graduates of traditional four-year programs are viewed more favorably. Contends that the solution to affordability challenges is greater support and resources for students, not a reduced credit degree that weakens academic quality.

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 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, we 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.

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.

The pilot framework is designed to ensure that new models are tested carefully, evaluated rigorously, and advanced only when they demonstrably serve students well. Thoughtfully designed reduced-credit pathways may expand access to high-quality applied baccalaureate degrees without compromising academic integrity. Pilot programs submitted to the Board are held to the same expectations for student learning outcomes as traditional baccalaureate degrees. As part of our review, we expect proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education, helping to ensure that students remain competitive across a range of post-completion pathways. 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 recognize the value of incorporating high-impact practices—such as project-based learning, internships, and employer-aligned experiences—which can deepen critical thinking and problem-solving skills and complement, and in some cases enhance, traditional classroom-based approaches.

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. 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, we will apply these guiding principles alongside our 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 our review, we expect proposals to give careful consideration, where appropriate, to prerequisites for graduate and professional education, helping to ensure that students remain competitive across a range of post-completion pathways. 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 recognize the value of incorporating high-impact practices—such as project-based learning, internships, and employer-aligned experiences—which can deepen critical thinking and problem-solving skills and complement, and in some cases enhance, traditional classroom-based approaches.

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 these pilots we do 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, we 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.

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.

We agree that Massachusetts must continue to uphold the highest standards in higher education. 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. Furthermore, we 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. The Innovation Regulation enables institutions to explore these approaches in a structured and controlled manner, supporting the careful testing of innovations designed to improve postsecondary

Brad Freeman, Vice
President for Government
Relations, AICUM

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, work-force 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."

Comment noted. It should also be noted tha 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, we will apply these guiding principles alongside our commitment to consumer protection when making approval determinations. Additionally, 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.

<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. Contends that the value of higher education extends beyond career preparation.</p>	<p>Please refer to Comment #9 concerning student risk. 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, we 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>
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