

Institutional Comments and Author Responses on Community College Baccalaureate Draft Report

June 10, 2014

During the time given to submit public comments, we received a total of twenty-two comments: nineteen comments from eleven institutions, one comment from a Texas State Representative, one comment from an advocacy group, and one comment from an economic development organization member.

Five of the comments mentioned that generally the report provided a thorough and balanced picture of the landscape. Many of the comments highlighted points already made in the report and expanded on these points with additional evidence and perspectives, but did not recommend specific changes to the report. However, several stakeholders noted concerns about the evidence in the report and/or specific points that were made, and suggested changes be made. In response to these comments and RAND's internal peer review process, we did make some changes to the report.

Below we detail some of the institutional comments, and some of the themes that came out of comments from multiple stakeholders. For each comment, the authors provide a response discussing the issue raised and noting whether changes were made in response to the comment(s).

Stakeholder Comment: Fifteen comments from ten institutions echoed information discussed in the report. The stakeholders summarized arguments presented in the report and provided additional perspective and detail, or voiced support for particular points raised within the report, but did not suggest or imply particular changes to the report.

Author Response: Most of these comments appeared to have been an effort to add another voice to an issue outlined fully in the report, and none of these comments suggested that changes be made to improve the discussion of the issue. We have informed stakeholders that they can submit full comments to the THECB if they would like their summary of issues within the report with additional perspectives to be seen in full.

Stakeholder Comment: Five stakeholders from five institutions focused on the concern that expanding Bachelor of Nursing programs to the community college level would inevitably exacerbate the clinical and faculty shortages that some regions currently experience.

Author Response: This potential issue was covered at length in the report, so we did not make any edits in response to the comment. It is true that any expansion of existing capacity will likely require additional faculty, as most institutions with existing BSN programs noted faculty shortages as the factor limiting current capacity. For community colleges that already or nearly meet faculty requirements, it is unclear whether expansion of RN-BSN programs would

necessarily exacerbate shortages any more than university expansion. Addressing nursing issues will certainly require an increased focus in the state on educating additional faculty.

On the point of clinical spaces, conversations with employers, institutions and experts in the field do not suggest that RN-to-BSN programs (the primary type of BSN program of interest to community colleges) would not place a significant additional burden on clinical spaces because the relatively few clinical hours required could largely be obtained in non-hospital settings or in hospitals where RNs are currently employed.

Stakeholder Comment: Six stakeholders from four institutions discussed a concern that the report was almost entirely based on qualitative data, and argued that there was a need for more data or empirical evidence to support arguments presented in the report.

Author Response: We agree that more quantitative data and more rigorous analyses could play a valuable role in informing decision-making around the issue. More quasi-experimental studies are needed to identify the impact of these programs relative to a counterfactual, and additional cost analysis would be useful in assessing relative costs of programs. Unfortunately, given time and budget constraints we were unable to conduct this additional research, and there is a lack of high-quality research on community college baccalaureate programs that we could rely on. We note in the Study Limitations section in Chapter 3 that the qualitative nature of much of the study is a weakness.

- **Data sub-comment 1: Three stakeholders from one institution argued that there is too much focus on mission creep given the evidence that baccalaureate programs represent a relatively small percentage of overall enrollment in the three community colleges in Texas and in community colleges with baccalaureate programs in other states.**

Author Response: As the stakeholders note in their comments, we do present the data on percentage of total enrollment accounted for by baccalaureate-pursuing students as evidence that may dispute notions of mission creep. However, the evidence is truly mixed, as many would argue that the number of programs may be a better measure of mission creep (Florida has more than 270 programs across 26 institutions). The number of programs may be more closely related to the amount of resources and institutional focus required to provide the program, rather than the number of students per program. In addition, the time horizon for mission creep may be longer than 10 years. The current evidence is not strong enough to suggest that concerns about mission creep can be dismissed. We did eliminate some of the repetition of mentions about mission creep in the report.

- **Data sub-comment 2: Two stakeholders, one from an institution and one from an external group, noted confusion in the report on the Health Information Technology (HIT) field analysis between HIT and Health Information Administration (HIA), and asked for additional detail and clarification to**

improve the discussion of the field. One stakeholder argued that there were needs for baccalaureate-degreed individuals beyond what was recognized in the draft, while the other stakeholder argued that while there was evidence of a need to improve the HIT pipeline, it is not clear more programs are needed.

Author Response: We have made substantial edits and additions to this section to provide additional detail and clarify the need for baccalaureate-degreed individuals in health information fields. We conclude that while there is some need for baccalaureate-degreed individuals, these needs might be met through the existing programs in HIA, health administration for individuals who want to hold administrative positions, and through nursing and IT degrees for individuals who want to pursue graduate degrees in the more technical health information fields.

- **Data sub-comment 3: One stakeholder from one institution requested that more data be included on: the proportion of BSN enrollees/graduates that are out-of-state enrollees, and the graduation rates of generic BSN versus RN-to-BSN students.**

Author Response: We now include a footnote when discussing online degree production to note that of UT Arlington's 2012 graduates, about 400, or 20%, come from out of state. This means that total graduates should be reduced accordingly to estimate the number of new Texas graduates. We did not have an estimate of the total number of online RN-to-BSN enrollees, as we cannot distinguish delivery method in the data we have, but we expect that overall, this would reduce BSN production numbers by approximately 600 graduates per year.

While we agree that it would be useful to better understand the differences between BSN and RN-to-BSN programs, we have decided not to include average graduation rates because they are not directly comparable. RN-to-BSN programs have a different time span and student populations with different characteristics, and without controlling for these differences the graduation rates will provide an incomplete picture of the outcomes.

- **Data sub-comment 4: One stakeholder from one institution requested that additional data on the success of the pilot institutions in Texas should be included to provide support.**

Author Response: We describe the prior study in Chapter 2, and include the mentions of pilot college programs wherever we thought that the evidence was relevant. We decided not to make any changes to address this comment.

Stakeholder Comment: Six stakeholders from six institutions suggested alternatives that they believed to be more appropriate than community college baccalaureate expansion.

- **Alternatives sub-comment 1: Four stakeholders from four institutions suggested strengthening partnerships between university and community**

colleges as an alternative to expansion of community college baccalaureate degree programs.

Author Response: We agree that this is an alternative that should be strongly accounted for in any policymaking around community college baccalaureate expansion, and give this substantial attention in the report. We did not think that changes were warranted in response to the comment.

- **Alternatives sub-comment 2: One stakeholder argued that expanding tuition and scholarship support would be a stronger alternative and provide greater access to higher education opportunities for students.**

Author Response: Financial aid certainly plays a critical role in supporting student access and expanding enrollments in Texas, and if community college baccalaureate programs are simply a means to increase overall enrollment, they should be considered against alternatives like financial aid. However, to the degree that community college baccalaureate expansion is intended to meet other needs, like a need for additional capacity and a better match of programs to workforce needs, financial aid may not be an appropriate policy to meet these needs. Given a large amount of content to cover, we necessarily limited the discussion in the paper to policies that could also meet these needs of capacity expansion and improved workforce preparation. We therefore did not make any changes in response to this comment.

- **Alternatives sub-comment 3: A stakeholder from a large community college system suggested that the focus be directed at apprenticeship programs as an alternative to expanding community college baccalaureate programs.**

Author Response: Similar to financial aid, this policy may be valuable for some purposes, including improved workforce preparation. It may not be as well-suited for increasing capacity and increasing overall enrollment and completion. Given a large amount of content to cover, we necessarily limited the discussion in the paper to policies that could also meet all three needs. We therefore did not make any changes in response to this comment.

Stakeholder Comment: Three stakeholders from three institutions noted that expanding community college baccalaureate programs showed a lack of efficiency and would inevitably raise costs for students.

Author Response: As we argue in the report, we do not think the evidence is conclusive on this issue. The key issues here are duplication and relative costs of programs. With regard to duplication, if programs are being created where universities already have additional capacity, then it may be true that these programs are creating inefficiencies given they are drawing from a fixed pool of incoming students and not bringing in new populations of students. In the case where expansion is required by either a community college or a university, we must compare relative costs. Community colleges may require significant upgrades that outweigh the lower per-unit cost of community college programs, and in this case university expansion is likely to

be more efficient. However, in cases where university programs would be more costly to create or expand based on capacity-building and per-unit costs, community colleges may be more efficient. We believe that this issue requires further study to provide more concrete data on relative costs. A full cost analysis was not included in this study because of program differences at the colleges that currently have BAT programs and a lack of standardized data related to program costs.

Stakeholder Comment: Three stakeholders from three institutions believed that the expansion of community college baccalaureate programs would have little to no impact on universities in terms of increased competition or reductions in resources.

Author Response: We added a sentence to reflect this perspective in the section on “unnecessary competition.” For certain arguments like this one, evidence is required to make an absolute conclusion, and there is unfortunately insufficient evidence on the impact of these programs on universities so we relied primarily on stakeholder perspectives. We made every effort to provide a balanced set of perspectives when the evidence was insufficient to suggest the most likely scenario.

Stakeholder Comment: Three stakeholders from three institutions thought the state workforce needs for bachelor degree nurses are currently being met in the state of Texas.

- **Nursing sub-comment 1: Two stakeholders from two institutions thought that online BSN programs served the state workforce needs for bachelor degree nurses in the state of Texas.**

Author Response: We did provide evidence to suggest that online degree programs have rapidly expanded, though it is unclear whether the programs have fully saturated the market. It is likely true that a large number of new online programs may not be needed. However, some of the community colleges and employers we spoke with noted demand for additional programs. In addition, the state may see some advantage to a range of online and face-to-face RN-to-BSN programs (and generic BSN programs) to cater to a range of needs and preferences among potential enrollees and to ensure that programs maintain sufficient quality. These stakeholders did not suggest any specific changes to the document, and we believe that the evidence was provided appropriately in the paper without drawing conclusions beyond what was contained in the data.

- **Nursing sub-comment 2: One stakeholder from a health science institution believes that successful statewide nursing initiatives built on industry relationships are currently meeting BSN workforce needs in the state of Texas.**

Author Response: We agree that it is important for any new policies around nursing program expansion to accommodate, compliment, and build on existing state initiatives, and we note this

in the report in Chapter 7. However, the evidence we received from employers, community colleges, and most universities suggested that demand for baccalaureate-degreed nurses is not being sufficiently met, particularly in urban areas with large numbers of magnet hospitals. We decided not to make any changes to the report in response to this comment.

Stakeholder comment: A stakeholder in the nursing field expressed a concern that the lack of national accreditation at community college nursing programs that could hinder the ability for BSN students to achieve higher levels of education.

Author Response: We have added a sentence to make the point that national accreditation may be useful, however, most MSN programs in Texas require individuals be licensed nurses who graduated from a SACS-accredited institution, but do not necessarily require an individual to come from a nationally accredited nursing program. In addition, if accreditation is viewed as important, the same standards should be held for both four-year and two-year institutions. Nearly 70 percent of community colleges do have national accreditation for their nursing programs, and approximately 10 percent of university nursing programs that do not have national accreditation. National accreditation is one means to provide quality assurance for programs, and should be considered as a standard for program approval, as we suggest. We did hear some opposition to setting national accreditation as a standard in our discussions with both four-year and two-year institutions, with institutions arguing that national accreditors are in turmoil, making the process difficult, and that national accreditation is prohibitively costly and time consuming.

Stakeholder Comment: A stakeholder noted that applied baccalaureate programs can help provide career and educational pathways that can entice greater numbers of students into careers in fields like those described in the oil and gas industry.

Author Response: We did not hear this justification in the field, so while we did not include it in the revised report, we wanted to ensure that it was listed here.

Stakeholder Comment: A stakeholder suggested that more clarity on the roles of community colleges and universities and the types of degrees is needed.

Author Response: We have made some revisions to the report to provide additional clarification on the current educational landscape in Texas, including a more prominent discussion of institutional roles and more detailed information on applied degree programs. Chapters 1 and 2 now include discussions of these issues.

Stakeholder Comment: A stakeholder stated that an additional self-study requirement for community college baccalaureate program approval would be unnecessarily prohibitive.

Author Response: We do mention that this requirement "would involve added expense, time, and effort on the part of community colleges." However, we do not have data to measure whether the costs are "unnecessarily prohibitive." Some or all of the pilot colleges provided self-

studies and maintain self-sustaining programs, suggesting that the requirement was not so prohibitive as to prevent the sustainability of programs.

Stakeholder comment: An economic development stakeholder submitted one letter of support in favor of community college baccalaureate expansion.

Author Response: This note did not require any specific changes, but we thought it important to share with the THECB.

In addition to these changes, we made other changes in response to RAND's quality assurance process, including:

- Slightly modified the study objectives and research questions to improve clarity and consistency.
- Reorganized Chapter 2 to provide an overview of higher education issues in Texas, including information on institutional missions and applied degrees. Moved the study framework and research questions to Chapter 3. These changes helped reduce repetition of these topics later in the report.
- Clarified key terms like "unmet need," "field," and "applied degree."
- Added more straightforward and conclusive statements on the workforce findings.