**TOPIC: Degree Authorization: Concordia University, St. Paul – Request for Provisional Authorization**

**PREPARED BY: Heather DeLange, Office of Private Postsecondary Education**

1. **SUMMARY**

This agenda item recommends Provisional Authorization for Concordia University, St. Paul (CSP) to operate in Colorado pursuant to the Degree Authorization Act (§23-2-101 et seq.).

1. **BACKGROUND**

The Colorado Commission on Higher Education (CCHE) has statutory responsibility for administration of Title 23, Article 2 of the Colorado Revised Statutes, commonly referred to as the Degree Authorization Act (DAA). The Act sets out the terms by which the Commission may authorize accredited private colleges and universities, out-of-state public colleges and universities, and seminaries and bible colleges to operate in Colorado.

The DAA outlines the Department’s jurisdiction over private education programs available to the residents of the state of Colorado. The DAA establishes standards to (1) prevent misrepresentation, fraud, and collusion in offering educational programs to the public and (2) protect, preserve, foster, and encourage the educational programs offered by private educational institutions, which meet generally recognized criteria of quality and effectiveness as determined through voluntary accreditation.

Provisional authorization is the authorization level for institutions, new or new to Colorado, which have been evaluated by Department staff under Commission procedures and authorized by the Commission to enroll students, offer instruction, graduate students, and award degrees under the condition that the institution is continuously seeking and is making satisfactory progress toward accreditation at the local site. Institutions with provisional authorization are required to renew annually and must receive accreditation at the Colorado site within three years of initial authorization.

Concordia University, St. Paul is a Minnesota based private not for profit, religious institution offering comprehensive and coeducational educational programs. The programs include a traditional 4-year Bachelor of Science in Nursing (BSN) at the St. Paul, MN campus, and an accelerated track (16-month) Bachelor of Science in Nursing (ABSN) degree offered at the St. Paul campus and at a Portland, OR campus. CSP now seeks authorization to offer the 16-month ABSN in Colorado. CSP ABSN students in Oregon and Minnesota have high first-time pass rates on the NCLEX-RN licensure exam. The university is institutionally accredited by the Higher Learning Commission since 1959 and will undergo its next reaffirmation of accreditation in 2027-2028.

Concordia University, St. Paul has a direct relationship with another Colorado authorized institution, Platt College. Platt College has been operating in Colorado for decades but has made the decision to close its doors. Upon the authorization of Concordia University, St. Paul, Platt College students will become Concordia University students and will complete their program under the new institution. Those Platt College students will be treated as if there is no change, in fact, several Platt College instructors are remaining and will become Concordia University instructors. The approved teach-out plan seeks to avoid unintended consequences for the students.

Programmatically, the University’s nursing program is accredited by the Commission on Collegiate Nursing Education (CCNE). The University must obtain authorization from Colorado before it can include and seek approval from the accrediting agencies. The University plans to seek approval at the Higher Learning Commission’s fall meeting, which will aid the transition and streamline the Platt College students’ program to avoid any disruption.

1. **STAFF ANALYSIS**

As required by the Degree Authorization Act, CSP submitted the required documents concerning its organization, programs, faculty, accreditation, and finances. Department staff contracted an evaluation team to review the application materials. The team provided a few recommendations, which are binding in terms of requiring a response from the institution. The institution provided its response to the areas of concern and the team provided a favorable recommendation for the provisional authorization of the University to establish a campus in Colorado. The evaluation team commented that they found the proposal to be strong overall.

The proposal to establish a location in Colorado will be simplified for the University as they will take over the lease from Platt College. Platt College recently moved its campus to a new site, 5660 Greenwood Plaza Blvd., Ste. 100N Greenwood Village, CO 80111, which will serve the incoming University and the students well.

Pursuant to statute, new institutions new under the Degree Authorization Act shall execute a bond or other surety instrument to provide indemnification to any student that the Commission finds to have suffered loss of tuition or any fees as a result of any act or practice that is a violation of statute. CSP officials are working to obtain a bond pursuant to the requirement.

1. **STAFF RECOMMENDATIONS**

**Staff recommends the Commission approve provisional authorization for Concordia University, St. Paul to offer its Accelerated Bachelor of Nursing program in Colorado under the Degree Authorization Act.**

**STATUTORY AUTHORITY**

**C.R.S. §23-2-103.3 Authorization to operate in Colorado – renewal**

(1) (a) To operate in Colorado, a private college or university shall apply for and receive authorization from the commission. A private college or university shall obtain a separate authorization for each campus, branch, or site that is separately accredited. A private, nonprofit college or university shall submit with its application verification of nonprofit status, including a copy of the institution's tax-exempt certificate issued by the Colorado department of revenue.

(b) After receiving an application, the department shall review the application to determine whether the private college or university is institutionally accredited by a regional or national accrediting body recognized by the United States department of education. The department shall not recommend and the commission shall not approve an application from a private college or university that, in the two years preceding submission of the application, has had its accreditation suspended or withdrawn or has been prohibited from operating in another state or that has substantially the same owners, governing board, or principal officers as a private college or university that, in the two years preceding submission of the application, has had its accreditation suspended or withdrawn or has been prohibited from operating in another state.

(2) To operate in Colorado, a private college or university shall be institutionally accredited on the basis of an on-site review by a regional or national accrediting body recognized by the United States department of education; except that a private college or university may operate for an initial period without accreditation if the commission determines, in accordance with standards established by the commission, that the private college or university is likely to become accredited in a reasonable period of time or is making progress toward accreditation in accordance with the accrediting body's policies. The commission may grant a provisional authorization to a private college or university to operate for an initial period without accreditation. The private college or university shall annually renew its provisional authorization and report annually to the commission concerning the institution's progress in obtaining accreditation.