



WRITTEN TESTIMONY FROM THE MIDDLE STATES COMMISSION ON HIGHER EDUCATION
Honorable Lynda Schlegel Culver, Majority Chair
Senate Education Committee
Commonwealth of Pennsylvania
October 12, 2026

Thank you to the members of the Senate Education Committee for inviting testimony from the Middle States Commission on Higher Education, a student-centered global institutional accreditor. I am Heather Perfetti, President and Chief Executive Officer. On behalf of the Commission, I appreciate the opportunity to provide information relevant to Pennsylvania's consideration of a reduced credit-hour baccalaureate credential model.

About the Middle States Commission on Higher Education

The Commission is a voluntary, nongovernmental institutional accreditor recognized by the United States Secretary of Education since 1952. We currently accredit more than 500 institutions, including institutions across the Commonwealth of Pennsylvania. As an institutional accreditor, we participate in the regulatory triad, where we serve as a quality assurance agency and as a gatekeeper for institutional eligibility to participate in Title IV federal student aid programs. We also work with state authorities, including the Pennsylvania Department of Education, to support institutional quality and integrity as well as accountability for the benefit and protection of students.

Accreditation Context for Emerging Credential Models

Institutions may consider alternative credential models in light of their missions and the needs of their students and communities. We evaluate whether institutions comply with applicable requirements, including state requirements related to credentials and curricula. When an institution proposes a different academic program or degree structure, the Commission considers the responsibilities of each member of the regulatory triad. As applicable, we confirm that the institution has obtained required approvals, whether state or federal. Our role is also to evaluate academic rigor, consistency with institutional curriculum-approval processes, and ensure transparent disclosure to students.

In practice, we would not allow an institution to offer a degree program that conflicts with applicable state law. We would also never preclude an institution from developing a program that complies with applicable law and our policies and procedures. We do not prescribe a minimum number of credit hours for a credential level and do not require baccalaureate degrees to total 120 credit hours. A three-year or reduced-credit-hour baccalaureate degree is evaluated on its design, quality, and compliance rather than on a fixed credit-hour total. If state law permits a credential proposed by an institution, we evaluate the program through the institution's regular accreditation cycle under the Commission's *Standards for*

Accreditation and Requirements of Affiliation, relevant policies and procedures, and applicable federal requirements.

We are deferential to each institution's mission and the students and communities it serves. This testimony is intended to encourage states and institutions to determine their approach to innovative, alternate credentials. We currently accredit institutions that offer such credentials, including institutions that operate both domestically and internationally. As state and federal requirements evolve, we will continue to evaluate emerging educational models with attention to academic rigor, student protections, affordability, and compliance with applicable law while partnering with our institutions and states to celebrate new, emerging innovative approaches.

Standards for Accreditation and Requirements of Affiliation

We apply our standards in the context of institutional mission and recognize that different models can support educational and operational quality. Our standards focus on student learning and expect institutions to design learning experiences that align with mission, support student learning outcomes and success, and provide appropriate services in a supportive environment. Our approach to accreditation allows our institutions to develop and assess new practices as their missions and communities evolve.

For reduced-credit-hour degrees, the relevant question is not whether a program contains a particular total number of credit hours. Rather, we evaluate whether the institution demonstrates that the curriculum, learning experiences, and credit assignments are appropriate to the credential awarded. We apply consistent expectations across institutional programs when evaluating academic rigor, curricular coherence, alignment with higher education expectations, and achievement of student learning outcomes while allowing institutional discretion in program design and delivery. Under this approach, institutions and states may establish new degree requirements.

Evaluation and Approval for Reduced-Credit-Hour Baccalaureate Degrees

While we evaluate an institution's academic portfolio through their regular accreditation review cycle, a separate approval process is not required solely because an institution adopts an alternative credit-to-degree structure, a three-year baccalaureate degree, or any other reduced-credit-hour program. With our accreditation, institutions remain responsible for everything offered in their name and for complying with applicable state law, system or institutional curriculum-approval processes, and any requirements of programmatic accreditors. Separate review by our Commission may be required if the program also triggers another category of substantive change under federal regulation (34 C.F.R. § 602.22) or the Commission's *Substantive Change Policies and Procedures*. For example, offering the program at an unapproved additional location may require review associated with that location. Otherwise, institutions have the ability already to offer these credentials if permissible by law.

Policy Considerations

As the Commonwealth of Pennsylvania considers legislation concerning alternative academic credentials, including three-year and reduced-credit-hour baccalaureate degrees, the following issues may warrant consideration:

- Terminology: Legislation should use *institutional accreditor* rather than *regional accreditor*. Federal regulations effective July 1, 2020, removed the regional designation to allow accreditors to reconsider their geographic scope.
- Accreditor roles: Legislation should consider how to account for institutional and programmatic accreditors because responsibilities and approval requirements differ.
- Variation in requirements: Although our Commission does not require separate approval solely because a credential uses fewer credit hours, other institutional accreditors may apply different requirements or may still be developing relevant policies or limiting these opportunities to pilot experiences.
- State licensure requirements: Programmatic accreditation and professional licensure requirements in Pennsylvania or other states may also affect program design and student eligibility. It will be critical to understand the implications for students who may pursue licensure within any jurisdiction and be prepared to ensure appropriate public disclosures.
- Institutional sectors: Policy discussions may include both two-year and four-year institutions. Although two-year institutions may not be authorized to award baccalaureate degrees in Pennsylvania, articulation agreements and other partnerships with four-year institutions may affect available student pathways.
- Student aid: Policymakers may wish to assess potential effects on eligibility for state and federal financial aid and other forms of financial support.
- Naming conventions: As these credentials are explored, it is important for students and employers to understand them. While our Commission would not be prescriptive on how states or institutions approach their naming, a designation that conveys distinctions among baccalaureate degrees may cause confusion and warrants additional considerations.

Concluding Remarks

In conclusion, as an institutional accreditor, we do not prescribe a single credential model. Institutions may consider three-year and other reduced-credit-hour credentials when those models are consistent with institutional mission, applicable law, accreditation requirements, and appropriate academic standards. We would neither require an institution to offer such a credential nor allow one that is not permitted by state law. A reduced-credit-hour credential can be consistent with our *Standards for Accreditation and Requirements of Affiliation* and related policies and procedures. Such credentials represent one of several models that policymakers and institutions may evaluate in relation to educational value, affordability, and workforce needs and not run afoul of institutional accreditation expectations with our Commission.

Thank you for the opportunity to provide this testimony and for your consideration.



Heather F. Perfetti, J.D., Ed.D.
President and Chief Executive Officer
Middle States Commission on Higher Education