Section III: Colleges in crisis – a summation

There are several ways to view the crisis that colleges and universities find themselves in at this juncture. Private colleges are racing to the bottom with discounts and an "arms race" of luxury spending because they cannot meet their revenue targets. They are in a spend-or-die situation. The latest Moody's Report calls this situation "a failed business model" and notes that the number of domestic high school graduates peaked in 2007-08.

To illustrate:

- Bad business and cost model. Bill Bowen makes the analogy that our higher education model is like a string quartet. You can neither speed up how they play nor reduce the number in the quartet. Higher education cannot cling to a model and a culture that associates increasing scale with decreasing quality, especially in the Internet age, which is really all about scale.

- Declining domestic high school graduate populations are intensifying the competition for students in private colleges—colleges already challenged by diminishing demand owing from high tuition sticker prices. The response to decreasing demand here is: 1) Club Med-style "arms race" in spending, and 2) widespread discounting. Both strategies mortgage the future and when combined are deadly. Essentially we're spending more and charging less, and we won't change our cost model.

- State universities and community colleges are growing because they are getting a higher share of the (declining) college-bound student market. At the same time, higher education funding is one of the few discretionary parts of the state budgets and thus is vulnerable.   Especially vulnerable as states begin to own up to the massive health and retirement mandates they face.

The student debt of $1 trillion or more is a political crisis and a substantive one. States will continue to withdraw support from higher education while intensifying cries for accountability and cost control. Higher education has only two choices: reducing costs or raising prices. Public higher education's political capacity to raise prices will be limited, given its severe political consequences. Therefore, the inevitable conclusion is that the cost of operating colleges and universities must be brought down.

Colleges and universities, in the main, have dealt with financial challenges by assuming they are business cycle challenges. They address those with short-term palliatives such as across-the-board cuts, travel freezes, and salary freezes. These are designed to be "made up" when the good times return.

However, higher education is now facing structural economic change along with cyclical ups and downs. Some of the structural change relates to changing demand and the globalization of higher education (e.g., China, Saudi Arabia, others building universities worldwide); some relates to changing student preferences (shift in focus to getting a job more than a broad education); some has to do with the widespread acceptability of distance education and the emergence of new providers who are not saddled with campus costs or traditional cultures. Yet, much of it simply has to do with higher education reaching the limits of affordability. Potential students are now choosing other options.

However unpalatable, solutions reside in challenging the sacred cows, such as:

- Exposing and then managing the issue of "capacity" utilization—too much empty classroom space, laboratory space, the number of courses taught, etc.

- Exposing the realities of higher education's capital programs—one-time money from donors and states to build buildings that are not always needed but nonetheless must be maintained even as operating funds decline.

- Demanding extensive analysis of the relationship of arms race spending on enrollments.

- Understanding the financial and political cost of attrition. At some institutions, this is starting to be managed more systematically. Much more can be done.

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- Outsourcing in ways that *import* innovation.
- Using online technology tools and approaches to increase scale. Break the myth that small class size and quality are unalterably locked.

Higher education's failure to begin to question, revise, and alter the culture myths that hold us together is to sentence us to a death by a thousand cuts. We cannot withstand an eternity of 2 percent salary increases, positions taken away when vacancies occur, program consolidation, continued deferred maintenance, and more. This simply invites innovators from the outside to do what we are unwilling to do ourselves. Hence the Innovator's Dilemma and the challenge of incumbency.

Section IV: Top issues in higher education facilities

How the critical issues were identified

The premise of the Thought Leaders symposium is that facilities leaders have much to contribute to the major challenges facing higher education. This year participants felt they could offer unique leadership on the matter of rising costs.

Nine top issues were identified by symposium participants, along with critical questions for institutional dialogue. The questions are the heart of the exercise: They are intended to guide facilities managers and university leaders in the discussions at their own institutions. A major goal of the Thought Leaders series is to help individual colleges and universities assess where they stand and help them develop strategies for the future.

1. Align the programs and priorities of the institution with its mission and vision.

The Issue: Today's colleges and universities cannot be all things to all people—they must focus on their own mission and vision.

Strategies:

- Analyze the institution's programs to see how well they reflect the mission and vision of the college or university.
- Eliminate degrees, programs, or activities that no longer serve a purpose for the institution.
- Focus on those efforts that enhance the college's or university's distinctiveness.

Thought Leaders participants saw many institutions squandering their energies on efforts that distracted from their main purpose. Nonessential programs or majors might have had significance at one time, but in the current financial climate, colleges and universities cannot afford to maintain departments that attract few students or administrative offices that serve outdated roles.

Start this process by taking a close look at the institution's mission and vision. Make sure the mission deals with the questions of who is being served, how they are being served, and the unique aspects of the way they are being served. Let the process guide the analysis of programs and their purpose. Consolidating or eliminating programs is a painful process. Colleges and universities need to demonstrate to those within the institution—as well as within the community, state, and academia as a whole—that the decision is appropriate. It is not simply a matter of making the simplest or easiest cuts; it is a broader effort to focus on the organization's mission and vision.

At the same time, campuses should consider the needs of their state or region. Is there demand that is not being met? Can the institution shift its attention to strengthening academic programs that will serve both students and the community?

Finally, the most successful colleges and universities will be those able to communicate their distinctiveness and build on their strengths. Each campus needs a clear identity that sets it apart and justifies its worth; if higher education becomes commoditized and one institution is just as attractive as another, colleges and universities will have difficulty defending their tuition receipts and state allocations.

Questions for institutional dialogue:

- How well has the college or university defined its mission and vision? Have these statements been tied to specific learning outcomes or priorities?
- How does the institution prioritize academic programs? Do priorities reflect institutional goals?
- Which programs no longer fit the institutional mission? Can you justify their consolidation or elimination? Will you be able to achieve buy-in for this decision?
- What makes your campus distinctive? Can you articulate how you stand out? How well is this distinctiveness communicated? What is diluting this distinctiveness?

■ How well does the facilities plan reflect the mission and vision of the institution as well as its distinctive identity?

2. Build campus-wide understanding of the "arms race" between institutions on campus spending.

The Issue: Conduct a detailed examination of how competition and rankings are shaping institutional decision making to make informed choices for the future.

Strategies:

■ Honestly consider the importance of rankings to your institution.

■ Consider the "arms race" in terms of your college's or university's mission and vision and understand how the institution makes decisions about spending.

■ Identify the drivers of change that stem from changes in student expectations (different living quarters, health and wellness, etc.).

Almost everyone in higher education deplores the "arms race" triggered by college ranking systems and competition for superstar faculty and administrators, but no one seems to have a clear idea on how to stop the cycle. Few institutions believe they can simply walk away from the current system.

Assuming the "arms race" is here to stay, therefore, colleges and universities should take an honest look at how the system is shaping spending on their campuses. With a clear-eyed view of the implications of the "arms race," senior campus leaders can make more informed decisions on where to invest their time and money.

Colleges and universities should assess how important rankings are to the institution. How widely are rankings promoted in marketing materials to prospective students and parents? Do potential freshmen cite the rankings in their decision to apply? What would be the potential cost of a drop in rankings?

The quality of architecture makes a difference in student success, but the drive toward a quality environment is not merely competition to look better. For example, employer/industry expectations regarding

the skills of our graduates are pushing changes in science buildings. These buildings are costing more to deliver to the standards of the industry; this is not being driven by competition with our peer institutions.

Institutions also need to revisit their mission and vision and see how the "arms race" either supports or distracts from the institution's goals. If there is a conflict between the two, what is the process and what are the criteria for prioritizing the expenditure of finite funds?

Questions for institutional dialogue:

■ How important are rankings to your campus? How much do they drive enrollment? What would be the cost if rankings slipped? If rankings increased?

■ How much money does the college or university spend to maintain its current position?

■ Does spending to maintain rankings align with the institution's mission and vision? If conflicts arise between investments driven by rankings and those driven by the mission, what is the process for prioritizing spending?

Data Point:
The higher education "arms race"

What do college ranking systems really care about—and why?

"Rankings are not benign. They enshrine very particular ideologies, and, at a time when American higher education is facing a crisis of accessibility and affordability, we have adopted a de-facto standard of college quality that is uninterested in both of those factors. And why? Because a group of magazine analysts in an office building in Washington, D.C., decided twenty years ago to value selectivity over efficacy, to use proxies that scarcely relate to what they're meant to be proxies for, and to pretend that they can compare a large, diverse, low-cost land-grant university in rural Pennsylvania with a small, expensive, private Jewish university on two campuses in Manhattan."

—*Malcolm Gladwell, "The Order of Things: What College Rankings Really Tell Us," The New Yorker, February 14, 2011.*

3. Better utilize and manage space.

The Issue: Inefficient use of space squanders the institution's highest cost asset—its buildings and grounds.

Strategies:

- Make space management a priority at the highest levels of the institution.
- Clearly communicate space policies and goals to the entire campus community.
- Gather comprehensive data about space to support planning and decision making.
- Identify unproductive uses of space as well as the benefits of improving efficiency.

Colleges and universities have invested in their built environment for years—sometimes more than a century—and the campus stands as the physical embodiment of the institution itself. However, many campuses are underutilized and underproductive. Participants at the Thought Leaders symposium agreed that wiser decisions about space would make a real difference in the college or university budget.

Support at the highest leadership levels is critical to changing campus thinking on space. Senior facilities officers may need to educate campus leaders on the role of space and support them through the process of mastering the topic.

With space identified as a top priority, institutions can start to align their overall mission with their space policy and elucidate their space priorities. With space needs clearly outlined, the campus can better communicate its goals and enforce its policies. Space will always be a contentious issue, but achieving buy-in is easier if everyone understands the goals and how they reflect the values and mission of the institution.

Another important step is understanding what space you have and how it is used. Solid, reliable, in-depth metrics about space are critical. Institutions with robust space management systems track a wide number of variables and regularly perform visual audits to assess not only the size of classrooms and labs but also their quality.

Finally, institutions need to look at where space is being underutilized. Increasing the productivity of space

makes better use of the campus's investment, but it can also have other benefits. Scheduling classes year-round not only makes better use of facilities, it also helps students decrease their time to graduation.

Questions for institutional dialogue:

- Do the board, the president, and the chancellor see space utilization and management as a priority? How can senior facilities officers support them in understanding space issues?
- Does the institutional mission define the space policy? Or are the two in conflict? What would it take to align the space policies with institutional goals and vision?
- Is the space policy clearly defined? How well is it communicated? How can you improve support of your policies and goals?
- What kind of data is in place on space? What additional data do you need? Can you put into place a new system for gathering comprehensive space data, including assessments of quality?
- How do you measure the cost of space? Is cost data detailed enough for informed decision making?
- Can you identify space that is being underutilized? What sort of incentives could the institution offer to students, faculty, and departments to improve space utilization? What would be the ancillary benefits to better space management?

Data Point:
Space management and productivity

Classroom allocation as a cost issue

"Extensive data show that better allocation of academic space—i.e., which courses are scheduled in which classrooms at which times—is an overlooked yet vital cost issue. Better allocation of classroom resources—identifying and addressing primetime bottlenecks by focusing on room ownership, meeting pattern efficiency and last-minute cancellation, etc.—can postpone or even cancel entire expensive classroom construction projects."

—*Gene Hickok and Tom Shaver, "Higher Education Can't Wait,"* Inside Higher Ed, *April 26, 2013.*

4. Involve faculty in decisions about facilities and space.

The Issue: Colleges and universities need the input and support of faculty for space management programs to be successful.

Strategies:

- Understand the current culture of space at your institution.
- Develop concrete steps for shifting the culture and achieving buy-in from faculty.
- Ensure faculty can contribute and are heard.

Improving space management has to start at the top, but it must have the support of a wide base of faculty and staff if it is to succeed. Human beings are territorial about space; it is understandable that departments and professors cling to their offices and labs. The culture of space on most campuses has encouraged this kind of thinking. It is time, however, to change that culture and create a new philosophy of space. This is a challenge that will only be met with the engagement of faculty.

The most successful space and facilities programs are those in which all sides respect the input of one another. Faculty can contribute information about their needs; administrators can offer guidance on campus-wide goals and priorities; and space management staff can detail budgets, schedules, utilization, and efficiency. If the ground rules are clear and everyone is listening, the institution will have made major strides in addressing its space challenges.

Questions for institutional dialogue:

- How are faculty currently involved in the allocation of space? Is their role too limited or too large? What would need to change to achieve a balanced approach?
- Is there a process for seeking input from different units of the institution regarding space?
- What is the level of buy-in of space management policies from faculty? What steps need to be taken for all sides to reach an understanding and move toward agreement?

Data Point: Changing the culture of space

Steps to an effective approach

Phil Rouble, facilities planning specialist at Algonquin College, suggests the following steps to change the culture of space on campus:

- Ensure you have a transparent and up-to-date space inventory.
- Establish a space management committee, led by academic affairs but with cross-campus representation.
- Empower the space management committee to set clear targets for levels of space utilization.
- Assemble the deans or department heads periodically to review "utilization zone analysis"— a close look at how well individual spaces are achieving utilization targets.

—Daniel Fusch, "Changing the Culture of Space Allocation," Higher Ed Impact*, Academic Impressions, December 8, 2011.*

5. Identify programs and facilities that need investment.

The Issue: The cost of neglected buildings, programs, and systems can quickly escalate. Institutions should seek out areas where investment is not being made, understand what is happening and why, and seek to reprioritize when investment is needed.

Strategies:

- Identify those buildings and systems that need new investment to remain useful to the institution.
- Use industry standards to gather data on the functionality and condition of buildings and determine the cost of renewal.
- Understand the cost of failing to invest in neglected buildings.

Recent financial pressures at colleges and universities have exacerbated a long-standing problem—that of neglected buildings, programs, and systems. The list of facilities that require significant upgrading and reinvestment is long and ever-growing, but administrative departments, academic programs,

and IT systems can also suffer from neglect. Allowing the campus to decay is a poor use of resources, so colleges and universities need to take steps to understand areas where attention is critical.

The first step is to identify at-risk structures or systems, but equally important is to quantify the cost of further neglect. The college or university needs to be clear on the cost of failing to make necessary investments. Will a building need to be demolished? Replaced? What will be the cost of relocating users?

Solid data is critical to this process. Institutions need to understand the condition of their facilities and how they are used. Industry groups have created tools to aid in this process, including the Facility Condition Index (FCI), developed in cooperation with APPA. The FCI is the ratio of deferred maintenance dollars to replacement dollars; it provides a straightforward comparison of an organization's key assets. Another key metric is the functional adequacy of the space—how well does the building fulfill its purpose? Conduct a gap analysis to determine what changes to make to increase a facility's functionality. The more hard data these analyses can produce, the better, since they will give institutions the information to objectively prioritize investments.

Data Point:
Facilities reinvestment

Taking a strategic, data-driven approach

"It is important to take a strategic approach, looking at the entire campus holistically. Any analysis, in order for it to be valid, must be based on accurate, objective data, including an understanding of current facility condition and remediation costs, functional adequacy, and demographics. Without access to detailed information regarding these issues, facilities managers and capital planners find it virtually impossible to decide whether buildings are worth the investment required to make them both useful and usable."

—Ray Dufresne, "Understanding Functional Adequacy and Facility Condition for Strategic Decision Making," Facilities Manager*, November/December 2012.*

Questions for institutional dialogue:

- What data is available about the functionality and condition of buildings? What would it take to get the institution the data it needs to make good decisions?
- What is the cost of continued neglect?
- Is there an objective system in place to prioritize investments? Can the institution defend its choices?
- Who are the champions, stakeholders, and decision makers for various at-risk buildings, programs, and systems?
- How do you evaluate your results?

6. Manage rising labor costs.

The Issue: Higher education facilities are confronting a loss of skilled labor and rising costs to hire skilled staff.

Strategies:

- Keep informed about the skilled labor market in your region to be prepared for upcoming changes.
- Evaluate the competitiveness of your institution and look for ways to increase your desirability to employees.

The facilities management industry as a whole and higher education in particular are confronting a looming shortage of skilled workers. The number of young people entering training or apprenticeship programs for skilled trades has declined dramatically. Meanwhile, those working in the trades today are reaching retirement age. More than 40 percent of construction workers, for example, are baby boomers, according to *Occupational Health & Safety Magazine*. As those staff move out of the workforce, not enough skilled trades people will be available to fill the gap.

As the market grows more competitive, higher education stands at a disadvantage. The financial strain on most campuses has reduced compensation, health care benefits, tuition assistance, and long-term job security. Where once colleges or universities were preferred workplaces, now they cannot compete against the private sector.

Institutional knowledge is also at risk. Older employees have often worked in the same position for years; they have grown to understand the quirks of existing buildings. As those staff members retire, they

will take with them decades of knowledge that facilities departments would be wise to try to capture. New employees will have a hard time picking up where their elders left off—many workers keep jobs for shorter periods today. An employee on the job for a year may only have begun to know the particulars of campus buildings and infrastructure.

Participants at the Thought Leaders symposium encouraged greater awareness about shifts in the labor market and more flexible HR policies to attract younger workers. Employees in highly competitive trades will soon be able to pick and choose where they work. More flexibility in policies, salaries, and advancement opportunities will help the institution attract critical staff. This flexibility can be difficult to achieve—public institutions must work under state hiring rules, while unionized campuses must deal with collective bargaining. Institutions need to have a clear sense of the roadblocks to flexibility and the stakeholders involved.

Questions for institutional dialogue:

■ Is your campus experiencing a shortage of skilled labor? What are projections for the labor market in your region? Are there formal mechanisms in place to track this? Do you expect shortages and, if so, in what time frame?

■ What are the ages of your workers? When would you expect certain staff to retire? Do you have a mechanism in place to capture their institutional knowledge?

■ What factors determine labor costs on your campus?

■ How can you reach out to industry, trade schools, and community colleges to get the skilled workers you need?

■ How widespread is awareness of labor issues on your campus?

■ How flexible are your HR policies? Do candidates see your institution as a desirable employer? What would need to change in your policies to improve your desirability?

■ What barriers stand in the way of increasing flexibility? Who are the stakeholders involved? Are others within the institution willing to discuss ways of removing these barriers? If not, why?

Data Point:
Skilled-labor shortage

The declining competitiveness of higher education

"When I went to work for the university, I came out of industry. The people who recruited me said, 'We can't pay you what you are making now, but look at the benefits and look at the retirement and all these things that go with it.' That was a selling point—it has been for years—but those benefits are under attack. It makes it even more difficult to recruit and retain."

—Brooks Baker, associate vice president for facilities, University of Alabama at Birmingham, quoted in "Facilities Managers Discuss Major Challenge: An Aging Workforce," Chronicle of Higher Education*, July 17, 2012.*

7. Understand the challenges posed by increasingly complex buildings.

The Issue: New building systems offer enormous benefits to institutions but also come with new costs and operational problems.

Strategies:

■ Understand both the benefits and costs of complex building systems.

■ Work with vendors to try to simplify building management systems.

■ Keep up with training for employees as building management systems evolve.

New management systems give facilities managers a tremendous amount of control over buildings. Building management systems allow fine-tuning of electrical consumption, air flow, lighting, security, and advanced sustainability systems. These systems have astounding potential, but they are also difficult to operate and time consuming to master. Today's high-performance buildings must be as fine-tuned as race cars; fail to adjust systems correctly, and costs can suddenly skyrocket.

Managing these systems is a growing challenge for higher education facilities departments. Maintenance jobs that could once be performed by low-skilled

employees must now be handled by highly skilled, highly trained experts—experts who must stay abreast of new developments in the field yet remain familiar with legacy systems on campus. And while advanced systems are intended to cut costs by reducing energy consumption and streamlining processes, they often increase costs.

Participants in the Thought Leaders symposium urged senior facilities officers and associations such as APPA to take a stand against growing complexity and work with vendors to simplify systems. Others within the facilities industry are also calling for simplified and easier-to-manage systems. A 2002 article on the website GreenBiz.com, for example, urged manufacturers and vendors to develop next-generation building management systems that would consolidate data from different building systems, accommodate third-party analytic software, integrate a wide range of systems (including facility management systems, business systems, and smart grids), and present information in clear, intuitive dashboards. These sorts of systems can help make building management easier and less costly for campuses.

Questions for institutional dialogue:

- What are the complexities of building management systems on your campus? Are the benefits worth the costs?
- How can the facilities management industry work with vendors to reduce the complexity of systems and keep costs down?
- How can senior facilities officers use the information from building management systems most effectively?
- What sorts of training and education programs are necessary to keep staff current on building management systems?

8. Limit rising costs associated with complying with codes and regulations.

The Issue: Federal, state, and local codes have grown increasingly complicated and place a burden on higher education.

Strategies:

- Understand the cost of codes to your institution.
- Educate senior administrative leaders on the burden of codes, and present ways to influence the process.
- Join forces with APPA to influence the development of codes and standards.

Addressing building codes is a standard part of facilities construction and management. Codes have an important purpose in ensuring the health and safety of the public, but participants at the Thought Leaders symposium believe many codes have gone beyond this straightforward goal.

New codes, often developed with the input of manufacturer, labor, and insurance industry groups, raise operations and maintenance costs to an extent disproportionate to their value. In other words, the codes are making buildings more expensive without necessarily making them any safer.

Symposium participants believe the root of the problem is lack of involvement of higher education facility leaders in the code and standards development process. By coordinating with other industry groups and standards development organizations, education can make a case for its unique challenges and needs. For example, colleges and universities, unlike many other institutions, operate multi-building campuses with professional facilities staff onsite 24/7. Codes designed for single buildings without onsite staff can increase the burden on colleges and universities, which should be able to take advantage of the economies of scale that campuses provide.

APPA has taken several steps to enable the education sector to influence the development of codes and standards at both the national and international level, and has been successful in leading efforts to change standards, through the efforts of the APPA Standards and Codes Council. The mission of the Council is as follows:

- **To promote codes and standards awareness and education among member institutions.** The Council seeks to make APPA members aware through a variety of means of the codes and standards that impact the institutional mission.

■ **Determine the impact of existing and proposed standards and codes on educational institutions.** The Council regularly evaluates emerging and existing standards and codes produced by national and international standards bodies, as well as government and regulatory agencies, in order to assess their relevance and support to the educational facilities environment, as well as evaluating the resource and financial impacts of compliance.

■ **Influence standards and code development process and outcomes.** To accomplish this objective, the Council actively engages in the standards development and review process among government agencies, standards developing organizations, and others.

■ **Set parameters on standards and codes on behalf of the education sector, and seek pragmatic solutions to the standards needs and requirements of educational institutions.** APPA's Standards and Codes Council seeks to ensure that the safety and well-being of students and the entire campus community remain first and foremost.

Thought Leaders participants urged senior facilities officers to get involved in efforts to shape code development through APPA and/or their institution. Facilities officers need to get a solid sense of what codes are costing their campus and then make the case for change to senior campus leaders. With the support of campus leadership, facilities leaders will be able to make progress reducing the cost of codes.

Questions for institutional dialogue:

■ What standards and codes are impacting higher education costs?

■ Who are the key decision makers at the institution who need to understand the challenge of onerous codes and can support the involvement of facilities officers with the issue?

■ How can senior facilities officers shape and influence standards and codes?

■ How can institutions pool their efforts or coordinate the investment of resources on standards and code development through the APPA Standards and Codes Council initiative?

9. Reduce the cost of unfunded mandates on the institution.

The Issue: The number of regulations and mandates on colleges and universities raises costs and places a burden on the institution.

Strategies:

■ Examine the cost of regulations on your campus.

■ Work with other institutions to lobby for less burdensome state and federal requirements.

Higher education is one of the most regulated industries in the United States. Administering financial aid, admitting foreign students, and conducting research all fall under complicated laws and regulations, many of which also have detailed reporting requirements. States also impose their own regulations, many of which, colleges and universities complain, overlap with federal requirements.

The result is a widespread sense that regulations are out of control. Particularly in today's higher education environment, where the pressure is on institutions to be productive and efficient, time and money spent filling out federal forms is burdensome.

In a recent survey of more than 2,000 higher education officials by the U.S. Department of Education's Advisory Committee on Student Financial Assistance, outrage boiled over. More than 85 percent of officials found regulations under the Higher Education Act burdensome; many specific regulations were cited that, respondents said, would yield significant cost savings if eliminated. Frustration at changing and evolving regulations is particularly high.

Participants at the Thought Leaders symposium agreed with the sentiments expressed in the survey and believe that reducing the regulatory burden will help institutions cut costs and improve efficiencies.

No one campus can change the regulatory environment. Reducing the burden of unfunded mandates will require the cooperation of the leaders of numerous institutions. However, individuals within higher education can start the conversation on their campuses by examining the role and cost of mandates. Reliable figures about the cost of individual regulations can give campus leaders evidence to lobby for

reductions in the regulatory burden on colleges and universities.

Questions for institutional dialogue:

- What unfunded mandates are increasing the cost of higher education?

- What are the costs of individual mandates? Is the benefit worth the cost?

- How can your campus partner with others in higher education to encourage the elimination or reduction of regulatory requirements?
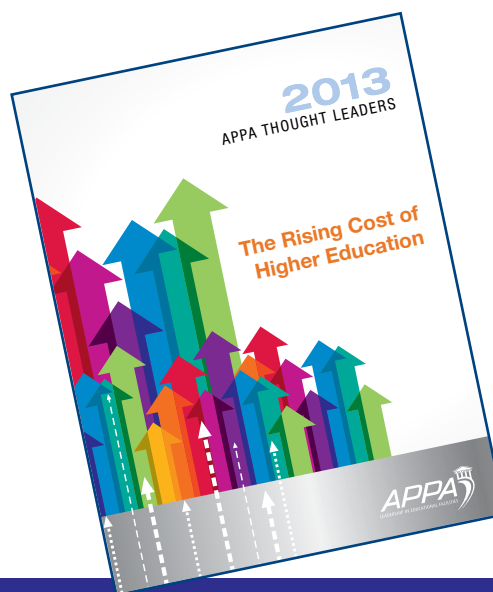
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