



May 2, 2022

**Open Letter to North Dakota Governor Doug Burgum  
on MOU with Western Governors University**

Honorable Governor Burgum,

On behalf of the NDSU Faculty Senate, the Faculty Senate Executive Committee would like to express its concern related to the recent MOU signed between Western Governors University (WGU) and the community colleges in the North Dakota University System (NDUS). In this regard, we agree with the NDUS Council of College Faculties (CCF) that stated its disappointment with this arrangement in its April 11, 2022 letter addressed to you.

In addition to the concerns raised in the CCF letter, we want to underscore the threat this MOU poses to North Dakota's regional and business communities, as well as the state. We contend that ND students and future business and political leaders should be educated in the state by those who know North Dakota, its people, and its needs, and that ND resources should go to ND institutions rather than being syphoned away by out-of-state, online-only institutions with inadequate educational offerings and records.

**1. Enrollment, retention, and graduation rates.** The headline on the [WGU website prominently claims](#) that "*North Dakota community college graduates make great WGU students.*" The website entices ND students to apply to WGU: "*You started your educational journey at a North Dakota community college—now it's time to finish it at WGU.*" This is clearly an attempt to divert enrollments from four-year colleges in the NDUS system at a time when these institutions are enhancing their program offerings with partial or fully online components to attract and retain North Dakotans. Why would the state undermine these efforts by directing our students to an external educational entity? This MOU will have adverse effects on NDSU's, your alma mater's, and other NDUS institutions' ability to attract students to its various quality programs affirmed not least through NDSU's recently reacquired R1 status.

Further, you might be unaware of the controversy surrounding WGU's instructional offerings, which makes it an odd partner for NDUS. In 2017, the inspector general at the U.S. Department of Education (USDOE) [recommended that WGU return more than \\$700 million in federal funding](#), arguing that "*most of the courses offered by the online-only nonprofit university do not meet federal requirements for distance education*" particularly in regard to "*the 'inadequate' faculty role in its competency-based programs.*" In addition, the inspector general's audit indicated that WGU's courses did not "*meet requirements for regular and substantive interaction between faculty and students.*" It is unclear whether, and to what extent, WGU has addressed

these deficiencies. In fact, if graduation rates are any indication, WGU fares worse than most NDUS institutions on the [USDOE College Scorecard](#). For instance, on this scorecard, [NDSU boasts a graduation rate of 57%](#) compared to WGU's 49%. Therefore, one must question the rationale for sending our ND students to an institution at which they are less likely to succeed in accomplishing their educational goals.

**2. Quality of online instruction.** The COVID-19 pandemic has dampened the promise of online instruction as a substitute for in-person instruction. Barely two semesters into the pandemic, NDSU students and their parents expressed overwhelming support for a return to in-person instruction, willing to risk contagion to experience the contact with their instructors and the social environment they valued in in-person courses. [National](#) and [international](#) literature surveying the state of education during the pandemic has underscored and supported the view that online instruction is unlikely to produce better learning outcomes than in-person instruction. The former may complement and enhance, but not supplant the latter. Moreover, online offerings do not complement and enhance in-person instruction if the former *"courses offered by the online-only nonprofit university do not meet federal requirements for distance education."*

NDUS currently offers more than 300 online graduate and undergraduate programs delivered by qualified professionals in those fields. During the pandemic, NDSU and other NDUS institutions stepped up to innovate their curricula by offering hybrid courses and creating stand-alone or complementary online programs, designed to better serve ND students and communities. These efforts give our in-state institutions a competitive edge over online-only WGU. For instance, along with its in-person offerings, NDSU has positioned itself as a leading institution in online degree and certificate programs in such areas as computer engineering, health professions, teacher education, and human development and family science. These programs were designed by the same faculty experts who have developed and continue to refine the NDSU curriculum to serve our state's needs. Moreover, current hybrid and online programs draw undergraduate and graduate students from abroad, thereby increasing university enrollments and state revenue.

These programs are exactly the ones the partnership with WGU would undermine. Given these concerns, sending ND students to an online-only institution where our students are less likely to succeed (i.e., graduate – see point #1 above) is contrary to their and the state's best interests. Rather than outsourcing our prospective students, the state could be providing better support and funding for curricular innovation at NDUS institutions.

**3. Impact on local communities.** If local students are encouraged to enroll in online-only WGU and send their money out-of-state, the ND communities where they otherwise would live, spend money, pay rent, and work will suffer from diminished financial revenues, with repercussions for local businesses' bottom lines. In addition, local communities will be deprived of the immaterial, yet invaluable contributions these students could make if they attended NDUS institutions, such as participating in local labor markets and networking with community organizations. It is questionable whether WGU can genuinely offer programs that are better aligned *"with the needs of North Dakota businesses,"* as your recent statement quoted in the [Bismarck Tribune](#) reads, than NDUS's homegrown programs intricately linked to, and

designed in response to and to serve, first and foremost, the needs of our local communities. Unlike WGU, NDUS institutions are invested in the success and progress of their local communities, as well as in supporting North Dakota and its citizens.

In this context, NDSU offers a dynamic and comprehensive curriculum built over time to offer our students the academic preparation and practical skills they need to contribute to the local economy. The same holds for the rest of our peer NDUS institutions. In light of these concerns, we urge you to reconsider this agreement with WGU, and instead to prioritize and uphold the needs of NDUS institutions in their sustained efforts to attract, retain, prepare, and graduate our North Dakota students.

Respectfully,

***NDSU Faculty Senate Executive Committee***

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