



Bill Jacob
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Chair of the Assembly of the Academic Senate
Faculty Representative to the Regents
University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607-5200

February 27, 2014

AIMÉE DORR
PROVOST AND EXECUTIVE VICE PRESIDENT
UNIVERSITY OF CALIFORNIA

Re: Policies and Protocols for Professional Degree Supplemental Tuition (PDST)

Dear Aimée,

The Academic Council has discussed the proposed revised policy for proposing and approving Professional Degree Supplemental Tuition (PDST) and changes to PDST levels (Regents Policy 3103), and the accompanying set of Presidential Implementation Protocols for PDSTs. Given the substantial concerns expressed by Senate reviewers, the Academic Council is unable to endorse the proposed policy revisions at this time. We ask that the authors make additional revisions and return the policies to the Senate for a second round of review.

All ten Senate divisions and two systemwide committees (UCPB and CCGA) submitted comments. Graduate Councils provided the bulk of the commentary for the divisions and expressed substantive concerns that were echoed in the comments of the two responding Senate committees. The concerns centered on onerous reporting requirements, and confusion about how to differentiate self-supporting graduate professional degree (SSGPDP) programs from programs eligible to charge PDST. There were also more general philosophical concerns about the impact of high-fee professional and self-supporting programs on access, diversity, and UC's public mission. All comments we received are enclosed.

The comments reflect a tension between sectors of the university that want to open up the academic enterprise to more high-fee professional degree programs and eliminate administrative barriers to them, and sectors that are concerned about the impact of those programs on access and the public mission of the university. Faculty are also concerned that the policy will encourage state-supported professional degree programs to convert to self-supporting status in order to avoid the complex approval process required for PDST. This division highlights the lack of principles to distinguish PDST-eligible programs from SSGPDPs.

We suspect that it will not be possible to completely resolve these issues in this policy or the SSGPDP policy in part because the rapidly changing academic landscape makes policies into moving targets that are difficult to design. Hence, the University's policies should be grounded in

clear principles precisely in order to provide guidance in navigating changing landscapes. This context suggests that it is not practical for UCOP to treat the PDST policy and the SSGPDP separately. Instead, we believe that these two policies should both be reconsidered, with the potential goal of developing an integrated Fee-Based Professional Program Policy that will provide principled guidance over a number of years rather than requiring near-annual revision to reflect the details of new initiatives.

The concerns are summarized as follows:

I. Onerous Reporting Requirements:

Several reviewers criticized what they believe to be onerous, unrealistic, and costly Presidential Implementation Protocols. They feel that the data collection, analysis, and consultation required by the protocols to justify PDSTs and set PDST levels will be overly burdensome for some programs and campuses; that the consultation protocols for programs proposing to charge PDST for the first time are unnecessarily arduous and have unclear value; and that the 18-month lead time for PDST changes is excessive given the need for programs to respond quickly to job market trends. Some reviewers commented that the protocols would require campuses to establish new structures and policies related to loan forgiveness programs for students, placing an additional strain on campus resources and infrastructure. Some reviewers feel that some of the data collection requirements are unrealistic, because data about comparators' student debt and faculty compensation are often not publicly available. One reviewer noted that the accessibility and affordability reporting requirements overlap with existing reporting mechanisms. There were also concerns that the protocols could discourage leadership, innovation, and uniqueness in UC's professional degree programs that seek to implement supplemental tuition, especially with respect to programs that do not currently exist elsewhere. There was also a feeling that the added complexity, in the context of a challenging financial environment, could motivate state supported professional programs to apply for self-supporting status.

Reviewers called for more streamlined protocols or at least a streamlined process for units that do not wish to increase their PDST levels for the subsequent three-year period. They also requested clarification regarding whether the policy requires units to submit a proposal every three years, regardless of whether or not the PDST level changes, or if units could submit a proposal to establish a PDST level for a different amount of time (beyond three years).

II. Unclear Differentiation between PDST and SSGPDP Programs

Several reviewers remarked on a lack of differentiation in policy between PDST-eligible degree programs and self-supporting graduate professional degree programs (SSGPDP), namely a lack of clear guidelines or principles for classifying a program as a state-supported professional program or a SSGPDP. Reviewers felt there should be closer coordination between the SSGPDP and PDST policies and a clearer distinction between the kinds of programs that fall under each. Other reviewers commented on the specific definition of a PDST-eligible graduate degree program in section VIII (policy clause 7) of the Presidential Implementation Protocols. They felt the proposed definition should be reconsidered and revised. One noted that the definition's focus on licensure and certification may be too narrow, given that there are existing professional degree programs where that definition is not met. The definition should be broadened to encompass existing programs that do not lead to licensure but are traditionally understood to be professional degree programs, and should also allow the possibility that programs that may be theory- or research focused, in addition to training an individual for a particular job or career, could be included under specified circumstances.

III. Access, Diversity, and UC's Mission

Several reviewers commented on the extent to which PDST policy should continue to prioritize access for underrepresented and low-income students and whether this is a goal supported in the policy itself. Several reviewers agreed that access and diversity must remain at the forefront of the policy and commented on the potential negative effects of supplementary tuition on diversity and student debt. And while one reviewer applauded the “enhanced attention given to questions of access and diversity as compared to the current version of the policy,” another noted that the policy does not meet the challenge of ensuring access to a University of California with greatly expanded PDST and Self-Supported Programs.

Regarding the requirement that programs with PDSTs offer a loan forgiveness program for students who seek low-paying job opportunities, one reviewer noted that loan forgiveness programs are not an effective mechanism to ensure access to disadvantaged groups. Another expressed concern about the lack of a clear rationale requiring the financial aid strategy to include a loan forgiveness program.

Some reviewers expressed larger concerns about the impact of PDST programs on the UC mission; particularly as faculty anticipate additional SSGPDPs and PDSTs being proposed in the future. There were concerns that the PDST model itself functions as a barrier to low-income students. Some faculty are anxious that a larger shift from state-supported programs to tuition-supported programs could limit access to UC graduate education and damage academic quality. One reviewer noted that neither the PDST policy nor the SSGPDP policy discusses academic quality or academic outcomes. There is a feeling that a public university should not incentivize the conversion of existing academic graduate programs to graduate professional degree programs, nor should it necessarily follow the market set by private universities. Reviewers suggested that UC collect data to monitor the effect of increasing numbers of PDSTs and SSGPDPs on general access and on state supported programs.

IV. Shared Governance

The Senate reviews include some commentary about the consultation and shared governance processes outlined in the Presidential Protocols that we feel is notable enough to bring to your attention. There was concern about minimal Senate input into the review process of ongoing programs, particularly in evaluating requests for increases (or decreases) in PDST. The Protocols in VI.A.1, mention faculty consultation, but should explicitly mention the Academic Senate. One proposed revision is as follows:

VI.A.1 (c) Academic Senate Executive Committee (or its equivalent) and other appropriate faculty and affiliated faculty leadership.

Second, in Implementation Section VIII.B: no reference is made to Senate consultation, through CCGA, in the case of existing degree programs that apply to initiate PDST. The specified criteria (a, b, c) entail academic judgments, and should acknowledge the need for Senate consultation.

V. Other Comments

- Clarify the meaning of “institutional climate” in sections (4) of Policy 3103 and IV A) of the Implementation Protocols.

- Clarify the definition of “aspirational” in section III G-H and the intent of this section. It is not clear why aspirational comparators should be only rarely included in the set of comparator institutions. aspirational comparators help define the academic potential of a program and set a clear metric for determining if a program is achieving its potential.
- In Policy 3103 Section 4b.i., clarify where the financial aid funding will be administered.
- In Policy 3103 Section 4b.ii, clarify intent of provision about supplanting the 33% return to aid, how this supplanting would occur, and a rationale.
- In Policy 3103 Section 4b.iv, clarify the definition of “regularly” with regard to the evaluation and reporting of financial aid effectiveness.
- In Policy Section (4) b.i, b.ii and b.iii, clarify why the adjective “new” modifies “PDST revenue,” in the context of the 33% rule, or better, delete “new.”
- In Implementation section I.B, clarify the approval process for “substantive” changes to the implementation protocols. Add the word “prior” before “notification” in the last sentence.
- In Implementation Section V.F, require rather than encourage consultation with the Graduate dean about financial aid planning.
- In Implementation, clarify the inconsistent use of “multi-year” and “three-year: particularly in section V preamble; and VII.A.
- Clarify that the policy will keep the current provision that revenue from PDST programs remain on the campus.

Finally, some respondents have requested that any future proposed revisions be accompanied by more contextual material, an explanation of the reasons for and implications of the revision, and a redlined version of the relevant sections.

Sincerely,



Bill Jacob

Encl. (1)

Cc: Academic Council
Executive Director Winnacker
Senate Analysts
Senate Executive Directors



February 20, 2014

WILLIAM JACOB
Chair, Academic Council

Subject: Draft policy on professional degree supplemental tuition

Dear Bill,

On February 10, 2014, the Divisional Council (DIVCO) of the Berkeley Division discussed the draft policy on professional degree supplemental tuition (PDST), informed by reports of our divisional committees on Academic Planning and Resource Allocation, Educational Policy, Status of Women and Ethnic Minorities (SWEM), and Graduate Council.

The discussion in DIVCO echoed key points in the report of our Graduate Council, which is appended in its entirety.

Two additional issues came to the fore during our discussion. First, we joined SWEM in applauding the “enhanced attention given to questions of access and diversity as compared to the current version of the policy.” Second, we noted concern that the uniformity of expectations with respect to reporting does not reflect the variability of the size of the fees and programs covered by the policy. This underscores the need to think carefully about the “data collection, analysis and consultation requirements” as noted by Graduate Council in its commentary.

Sincerely,

A handwritten signature in cursive script that reads 'Elizabeth Deakin'.

Elizabeth Deakin
Chair, Berkeley Division of the Academic Senate
Professor of City and Regional Planning

Encl.

Cc: Nancy Wallace, Chair, Committee on Academic Planning and Resource Allocation
Ronald Cohen, Chair, Committee on Educational Policy

Nicholas Paige, Chair, Committee on the Status of Women and Ethnic Minorities
Mark Stacey, Chair, Graduate Council
Martha Winnacker, Executive Director, Academic Senate
Linda Song, Associate Director staffing Graduate Council
Linda Corley, Senate Analyst, Committee on Educational Policy
Diane Sprouse, Senate Analyst, committees on Academic Planning and Resource Allocation, and Status of Women and Ethnic Minorities



February 6, 2014

PROFESSOR ELIZABETH DEAKIN
Chair, Berkeley Division of the Academic Senate

*Re: Proposed changes to Professional Degree Supplemental Tuition (PDST)
policy and implementation protocols*

Dear Chair Deakin,

The Graduate Council (GC) discussed the proposed changes to PDST policy and implementation protocols at its February 3, 2014 meeting. Members appreciated the task force's work to create a standard protocol by which academic units could propose a PDST level and request changes, which includes ample opportunity for student and faculty input and provides a standard timeline for preparing and submitting the proposal. There was also support for the multi-year perspective that the proposed policy takes in the review of PDST requests, which provides predictability for students.

It was unclear to members, though, if units would be required to submit a proposal every three years, regardless of whether or not the PDST changes, or if units could submit a proposal to establish a PDST level for, say, five years. The policy and protocols ought to be clear on this point. If units must re-submit a proposal every three years even if the PDST does not change, then the policy and implementation protocols should be clear that failure to re-submit a proposal means the elimination of the PDST after three years.

Assuming that units must submit a PDST proposal every three years, members were concerned that the data collection, analysis and consultation requirements were so great as to require units to constantly be in a process of preparing a proposal or unintentionally encourages *pro forma* responses. An alternative would be to offer a streamlined process for units who do not want to increase their PDST level for the next three-year period or to lengthen the time period for submission of new plans beyond three years.

Members agreed that the 33% return-to-aid was appropriate, but noted that the details of how that financial aid is distributed necessarily varies between departments, schools and

campuses due to variations in students' financial need, or even in the ability to assess that need, and that this flexibility serves academic units well in admitting diverse and excellent cohorts of students. The GC thus believes that it is important that individual academic units continue to determine how they distribute financial aid among students.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Stacey', with a stylized, cursive script.

Mark Stacey
Chair, Graduate Council



OFFICE OF THE ACADEMIC SENATE
ONE SHIELDS AVENUE
DAVIS, CALIFORNIA 95616-8502
TELEPHONE: (530) 752-2231

February 25, 2014

WILLIAM JACOB, CHAIR

UC Academic Council
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RE: Professional Degree Supplemental Tuition (PDST) Task Force

The Professional Degree Supplemental Tuition Task Force draft proposed policy revisions were forwarded to all Davis Division of the Academic Senate standing committees and Faculty Executive Committees from the Schools and Colleges. Responses were received from the Committee on Planning and Budget and the Faculty Executive Committees from the College of Letters and Science, the College of Education, and the Graduate School of Management, as well as from Graduate Council.

Substantive comments were received from the Faculty Executive Committee of the Graduate School of Management, which I summarize below.

1. The Graduate School of Management noted that on page 9, Section VIII, (A), a blanket prohibition against charging PDST for programs offering a Doctor of Philosophy degree is unnecessarily restrictive. Some Doctor of Philosophy degrees are highly professional, and so the determination of whether a program offering a Doctor of Philosophy degree, or a Master's degree on a path to a Doctor or Philosophy degree, can charge PDST should be considered on a program-by-program basis. The Committee suggested that clause (A) be omitted or at least modified so as to accommodate the possibility of charging PDST.
2. The Graduate School of Management also noted that, though there is support for upfront financial aid assistance to socioeconomically disadvantaged applicants, clear rationales do not exist for requiring that the financial aid strategy include a loan forgiveness program for students seeking low-paying job opportunities. According to the Committee, loan forgiveness creates distorted incentives for students.
3. The appropriate levels of fees and PDST are set in comparison with those set by peer schools. In addition, however, there are two other important factors that are currently missing in the proposed protocols:
 - a. Peer schools may not be subject to a 33% revenue financial aid requirement
 - b. Peer schools may receive greater state support and thus may be able to charge lower PDST than a comparable program would need to

In addition to comparative fees, operating cost differentials and state support differentials also need to be taken into account when setting the PSDT fee levels.

4. In clause (4), b, (ii) of the Regents Policy 3103, it is unclear whether the word "supplant" (i.e., replace) should instead read "supplement."

The Committee on Planning and Budget (CPB) could not find anything in the proposed policy revisions that related PDST to the actual cost of delivering the program. The document states that the amount charged should allow the

unit to “achieve and maintain excellence so that these programs remain among the best in the country, public or private,” which is a very far ranging statement. CPB would not approve of PDST increases justified by the cost of hiring the very best faculty at, say, \$500,000 annual salary. When the document suggests consultations with students, what is going to convince any student that they need to spend an extra \$15,000 on tuition per year when their debt load is already going to be very high? Perhaps consultation with students would be more meaningful if programs would be required to provide students with detailed information about the cost per student of putting on the program.

Graduate Council accepted the recommendations of the Academic Planning and Development (APD) Committee on the draft proposed policy revisions, with the discussion noting that the process outlined in the proposal was somewhat cumbersome and lengthy with a strict timeline. The Council noted that this was probably necessary in light of assuring that the PDST is a well justified and rare occurrence.

The Davis Division of the Academic Senate looks forward to receiving an updated policy proposal addressing the concerns raised before the policy is finalized. Thank you for the opportunity to opine.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Bruno Nachtergaele', written over a horizontal line.

Bruno Nachtergaele, Chair
Davis Division of the Academic Senate
Professor: Mathematics



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February 20, 2014

William Jacob, Chair, Academic Council
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RE: Systemwide Review of Professional Degree Supplemental Tuition (PDST)

At its meeting on February 18, 2014, the Irvine Division discussed the two draft documents prepared by the University-wide Professional Degree Supplemental Tuition (PDST) Task Force, namely:

- (i) Regents Policy 3103: POLICY ON PROFESSIONAL DEGREE SUPPLEMENTAL TUITION, and
- (ii) Presidential Policy Implementation Protocols for Regents Policy 3103: Policy on Professional Degree Supplemental Tuition

The following comments were submitted by the Graduate Council and the Council on Planning and Budget.

Graduate Council (GC)

The Graduate Council (GC) reviewed the Systemwide Review of Professional Degree Supplemental Tuition (PDST), and while members commended the efforts to maintain the accessibility and affordability of PDST programs and the modification to allow PDST levels to be approved at three-year intervals, they also agreed that the policy and implementation protocols are not an improvement over the current system. In fact, members felt that keeping the current system in place is preferable to making these changes. GC believes that the PDST policy and protocols is overly specified and unnecessarily laborious, and offers the following concerns and comments:

- The requirement to establish a set of at least three comparators and to keep track of indicators on comparators programs' does not seem feasible. Comparators may be more in line with accreditation or academic program reviews.
- Much of the information requested for comparators (e.g., average student debt, faculty compensation) is not publicly available and will be difficult to obtain. Supplying such information should not be mandated as requirement in the policy.
- The policy requires that PDST programs consult with students and faculty when determining proposed PDST levels. While GC agrees that faculty and student input is important and valuable, the policy does not specify how this information should be

- used. This guideline could lead to unreasonably high investments of time and effort required to obtain such input, and thus would render the process inefficient.
- The lead-time required to implement changes to PDST (18 months) is excessive. It requires that programs make long-term and unreliable future estimates. Given that PDST programs need to be responsive to trends on the job market, such long lead-times are contra-productive to students and faculty involved in such programs.
 - Accessibility and affordability are important goals, but the reporting required by the policy is excessive and overlaps with other reporting mechanisms already in place. Some members were also concerned about the punitive nature of the process if diversity goals are not met.

Council on Planning and Budget

- In sections (4) of Policy 3103 and IV A) of the Implementation Protocols, the meaning of “institutional climate” is unclear, as well as how one would “consider the impact” of it.
- The language in section IA of the Implementation Protocols is vague and self-evident.
- The data requirements of Sections III and IV of the Implementation Protocols are onerous and most likely unrealistic as to the public availability of all the requested data. Furthermore, in section IIIG the definition of “aspirational” is unclear, as is the intent of this section. Both require clarification. As written, some members felt that this section discourages leadership, innovation and uniqueness in UC’s professional degree programs that seek to implement supplemental tuition, especially with respect to programs that do not currently exist elsewhere. Most importantly, CPB suggests that the data requirements of these protocols be streamlined.

The Senate Cabinet agreed with the Councils’ comments and noted that there is a lack of a clear distinction between the Professional Degree Supplemental Tuition and the Self-Supporting Program policy.

The Irvine Division appreciates the opportunity to comment.



Peter Krapp, Senate Chair

C: Martha Kendall Winnacker, Executive Director, Academic Senate

25 February 2014

William Jacob, Chair, Academic Council
1111 Franklin Street, 12th Floor
Oakland, CA 94607-5200

Re: Professional Degree Supplemental Tuition Policy

Dear Bill,

Thank you for the opportunity to review the proposed Regental Policy for Professional Degree Supplemental Tuition and the Presidential Policy Implementation Protocols. Input on these revisions was solicited from the Graduate Council, the Committee on Planning and Budget and from all of the Faculty Executive Committees.

Several concerns were raised in the responses and in discussion by the Executive Board. The first was the potentially onerous burden of the reporting cycle. Although there was a real appreciation of the responsibility to explain any increase in professional degree supplements and the idea of multi-year planning, there was a suggestion from the Graduate Council that programs not seeking an increase might be better served by a longer cycle, perhaps every five years. Especially following the recent discussion on the proposed SSGPDP policy, there was substantial concern that there would be a preference for professional degree programs to pursue the self-supporting strategy rather than assume the more complicated requirements of this policy.

There was also concern about the time line – both for its length and for its timing. Although it fits well for the Regents' decision making, it fits less well in terms of the academic year, students considering applying to the program, and in launching new professional degree programs. Some timeline requirements seemed unclear and even mysterious. It would have been useful to know, for example, what the goal of the required webinar for new students would be.

Although we were pleased to see that student input is an important part of the review process, we were concerned that Senate input was relatively minimal. One of the places where this was most notable was in the absence of any reviews of the ongoing programs. At UCLA, many of the degrees that collect professional degree supplemental tuition are reviewed as part of the regular eight year review cycles; some others are reviewed by other accrediting agencies. It seems only logical that these reviews should be considered in evaluating requests for increases (or decreases) in the PDST. This would serve two purposes. The first would help to clarify the role of the Graduate Council in the process. The second and more important would help to emphasize the importance of the program's quality.

The latter point was one raised most often in relationship to the comparable programs / institutions. Although the document allows aspirational comparisons if an adequate explanation is offered, it seems to suggest that a strategy of making these programs better and more competitive may be less so. Certainly that is not a message this policy should send, even if unintentionally.

The FEC of the Henry Samueli School of Engineering and Applied Science, which was generally supportive of the proposals, suggested an editorial change that it felt would clarify the discussion on comparable institutions. Rather than the sentence, "Each PDST program is responsible for establishing and justifying a set of peer programs at other institutions", it proposes "Each PDST program is responsible for establishing and justifying the PDST on the basis of comparisons with a set of peer programs at other institutions."

There was general enthusiasm for the close attention to affordability and financial aid, as well as to the inclusion of student interests.

Sincerely,

A handwritten signature in black ink, appearing to read "Jan Reiff". The signature is fluid and cursive, with a small dot above the "i" in "Reiff".

Jan Reiff
Chair, UCLA Academic Senate, 2013-2014

Chair, UCLA Academic Senate

cc: Martha Kendall Winnacker, Executive Director, Academic Senate
Michael LaBriola, Principal Policy Analyst, Academic Senate
Linda Mohr, Interim CAO, UCLA Academic Senate
Serge Chenkerian, MSO, UCLA Academic Senate



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February 21, 2014

William Jacob, Chair Academic Council

RE: Merced Division Comments on the Systemwide Review of Professional Degree Supplemental Tuition

Thank you for the opportunity to review the proposed revised Policy on Professional Degree Supplemental Tuition and new Presidential Implementation Protocols. The proposed “Regents Policy 3103: Policy on Professional Degrees Supplemental Tuition” and “Presidential Policy Implementation Protocols for *Regents Policy 3103: Policy on Professional Degree Supplemental Tuition*” are intended to replace the existing “Regents Policy 3103: Policy on Professional Degree Supplemental Tuition” and “Regents Policy 3104: Principles Underlying the Determination of Fees for Students of Professional Degree Programs.” The Merced Division Council, Standing Senate Committees and School Executive Committees reviewed the policy and provided the following feedback.

The Committee on Academic Planning and Resource Allocation (CAPRA) conveyed that it appears the major proposed changes are in the implementation section, where the new policy is far more prescriptive than the old one and appears to require a great deal more administrative work by the campus to set and justify tuition. CAPRA infers that these much more detailed guidelines are intended to address perceived problems with the implementation of the existing policy. The committee also notes as UC Merced does not have professional degree programs in place at this time, these proposed changes do not hold significant implications for the campus.

The Graduate Council expressed the following questions and concerns about the new policy:

1. The academic and financial arguments for what type of programs fall under the PDST vs. SSGPDP policy are not clear.
2. Given recent issues with PDST fee increase approvals, many such programs may want to convert to SSGPDPs. Further articulation of how this will be handled would seem desirable.
3. With some PDST and SSGPDP programs anticipated to be coming on-line in future, how will the state-supported mission of the university and support of the state for the university, be impacted?
4. In line with Graduate Council’s recommendations for the SSGPDP policy, tracking mechanisms should be put into place to ensure monitoring and early rectification of any accessibility issues or impacts on parallel state-supported programs.

5. Consultation of the Academic Senate, through its standing committees, should be sought when existing State-Supported programs consider conversion to PDST status, to ensure it is an appropriate program for the PDST funding model. This is an academic question, rather than just a financial one, so senate consultation would seem to be appropriate and advisable.

No additional comments or concerns were received. We thank you for the opportunity to opine.

Sincerely,

A handwritten signature in black ink, reading "Ignacio López-Calvo". The signature is written in a cursive, flowing style.

Ignacio López-Calvo, Chair
Division Council

CC: Division Council
Senate Office

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ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON ACADEMIC PLANNING AND RESOURCE ALLOCATION
ANNE KELLEY, CHAIR
amkelley@ucmerced.edu

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MERCED, CA 95344
(209) 228-4369; fax (209) 228-7955

February 7, 2014

To: Ignacio López-Calvo, Chair, Division Council

From: Anne Kelley, Chair, Committee on Academic Planning and Resource Allocation *Anne Kelley*
(CAPRA)

Re: Systemwide Request to Review Professional Degree Supplemental Tuition Policy

The proposed "Regents Policy 3103: Policy on Professional Degree Supplemental Tuition" and "Presidential Policy Implementation Protocols for *Regents Policy 3103: Policy on Professional Degree Supplemental Tuition*" are intended to replace the existing "Regents Policy 3103: Policy on Professional Degree Supplemental Tuition" and "Regents Policy 3104: Principles Underlying the Determination of Fees for Students of Professional Degree Programs". It appears that the major proposed changes are in the implementation section, where the new policy is far more prescriptive than the old one and appears to require a great deal more administrative work by the campus to set and justify tuition. CAPRA can only infer that these much more detailed guidelines are intended to address perceived problems with the implementation of the existing policy.

As UC Merced does not have professional degree programs in place at this time, these proposed changes do not hold significant implications for the campus.

cc: CAPRA Members
DivCo Members
Senate Office

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ACADEMIC SENATE, MERCED DIVISION
GRADUATE COUNCIL (GC)
VALERIE LEPPERT, CHAIR

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5200 NORTH LAKE ROAD
MERCED, CA 95343
(209) 228-6312

February 14, 2014

To: Ignacio López-Calvo, Senate Chair

From: Valerie Leppert, Chair, Graduate Council (GC)

Re: GC comments on the Systemwide Policy on Professional Degree Supplemental Tuition

In response to DivCo's request, the Graduate Council reviewed the proposed revised Policy on Professional Degree Supplemental Tuition and new Presidential Implementation Protocols. The council's concerns and comments are summarized below.

Major questions/concerns about the new policy include:

1. The academic and financial arguments for what type of programs fall under the PDST vs. SSGPDP policy are not clear.
2. Given recent issues with PDST fee increase approvals, many such programs may want to convert to SSGPDPs. Further articulation of how this will be handled would seem desirable.
3. With more PDST and SSGPDP programs anticipated to be coming on-line in future, how will the state-supported mission of the university and support of the state for the university, be impacted?
4. In line with Graduate Council's recommendations for the SSGPDP policy, tracking mechanisms should be put into place to ensure monitoring and early rectification of any accessibility issues or impacts on parallel state-supported programs.
5. Consultation of the Academic Senate, through its standing committees, should be sought when existing State-Supported programs consider conversion to PDST status, to ensure it is an appropriate program for the PDST funding model. This is an academic question, rather than just a financial one, so senate consultation would seem to be appropriate and advisable.

Cc: Graduate Council
Division Council
Senate Office

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SANTA BARBARA • SANTA CRUZ

ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON RESEARCH
RUTH MOSTERN, CHAIR
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January 15, 2014

To: Ignacio López-Calvo, Chair, Division Council

From: Ruth Mostern, Chair, Committee on Research (COR)

A handwritten signature in dark ink, appearing to read "Ruth Mostern", is placed to the right of the "From:" line.

Re: Systemwide Request to Review Professional Degree Supplemental Tuition

COR appreciates the opportunity to review the documents pertaining to Professional Degree Supplemental Tuition but has no comments.

cc: COR members
DivCo members
Senate office

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ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON FACULTY WELFARE, DIVERSITY & ACADEMIC FREEDOM
RUDY ORTIZ, CHAIR
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February 10, 2014

To: Ignacio López-Calvo, Chair, Division Council

From: Rudy Ortiz, Chair, Committee on Faculty Welfare, Diversity, and Academic Freedom (FWDAF)

A handwritten signature in black ink, appearing to read "R. Ortiz", is placed over the "From:" line.

Re: Systemwide Request to Review Professional Degree Supplemental Tuition Policy

FWDAF appreciates the opportunity to review the policy on Professional Degree Supplemental Tuition but has no comments.

cc: FWDAF members
DivCo members
Senate office

UNIVERSITY OF CALIFORNIA, MERCED

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ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON ACADEMIC PERSONNEL (CAP)
RAYMOND GIBBS, CHAIR
gibbs@ucsc.edu

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MERCED, CA 95344
(209) 228-4369; fax (209) 228-7955

February 7, 2014

To: Ignacio López-Calvo, Chair, Division Council

From: Raymond Gibbs, Chair, Committee on Academic Personnel (CAP) *Raymond Gibbs*

Re: Systemwide Request to Review Professional Degree Supplemental Tuition Policy

CAP appreciates the opportunity to opine on this systemwide review item but has no comments.

cc: CAP Members
DivCo Members
Senate Office



CHAIR, ACADEMIC SENATE
RIVERSIDE DIVISION
UNIVERSITY OFFICE BUILDING, RM 225

JOSE WUDKA
PROFESSOR OF PHYSICS AND ASTRONOMY
RIVERSIDE, CA 92521-0217
TEL: (951) 827-5538
E-MAIL: JOSE.WUDKA@UCR.EDU

February 19, 2014

William Jacob, Chair, Academic Council
1111 Franklin Street, 12th Floor
Oakland, CA 94607-5200

RE: Senate review of proposed draft policy on Professional Degree Supplemental Tuition

Dear Bill,

The UCR Executive Committee reviewed the draft policy on Professional Degree Supplemental Tuition (PDST). The Council had several concerns and suggestions that I summarize below.

The greatest concern (Graduate Council, P&B) expressed was the lack of coordination between the supplemental tuition and self-supporting program policies, and the limited discussion of the implications these policies will have on the structure of the University of California. Council urges a thorough joint discussion of supplemental tuition and self-supporting programs, especially of the mechanisms that will ensure that the core mission of the institution will not be damaged by the adoption of the recent policy proposals. As it is Council is very concerned about the UC giving its imprimatur to exclusive programs that may erode the commitments to the UC to academic excellence and availability of education.

There were also concerns about the specific language presented.

The draft does not mention any consultation with the Senate, though consultation with faculty is included. We suggest adding to the policy the requirement that the Senate be consulted at those times where faculty consultation is elicited (Graduate Council). Also lacking is an expectation that the programs soliciting PDST should maintain the level of academic excellence expected from the University of California (P&B)

There were also serious concerns about the procedures described in the draft policy, which can become so onerous as to ensure a minimum or perhaps total absence of programs pursuing this program (BCoE). If the intent is to discourage units from requesting PDST, this is not the proper mechanism. There were also concerns that this policy could lead to a lack of uniformity within the UC system, leading to formally equivalent, but de facto tiered set of program. Related to this are concerns on the implications of PDST on state funding for professional degrees.

We appreciate the opportunity to comment.

Sincerely yours,
Jose Wudka
Professor of Physics & Astronomy and Chair of the Riverside Division

CC: Martha Kendall Winnacker, Executive Director of the Academic Senate
Cynthia Palmer, Director of UCR Academic Senate office

January 29, 2014

To: Jose Wudka, Chair
Riverside Division

From: Lynda Bell, Chair *Lynda S. Bell*
Graduate Council

RE: Graduate Council comments on Proposed Policy on Professional Degree Supplemental Tuition (PDST)

Graduate Council discussed the Proposed Policy on Professional Degree Supplemental Tuition (PDST) at its meeting on January 16, 2014. We benefitted from the detailed background provided to us from our CCGA representative, John Kim, on the current state of discussion at CCGA not only on this proposed policy but also on the general problems and potential overlap (and problems differentiating among) state-supported professional degree programs and self-supporting professional degree programs. We will say more on this general discussion below.

As for the current policy proposal before us, dealing with timelines and procedures for setting and altering professional degree supplemental tuition, Graduate Council members did not have much to say. We queried our members who are faculty in UCR's professional schools and they assured us that faculty do not really "care" much about these fee-setting processes; rather, they stressed, these are issues about which deans care a great deal, tending not to like too much regulation from above. By and large, however, the bulk of opinion expressed at the Graduate Council meeting is that centralized regulation of such fees is necessary and important, and that the financial aid aspects of the procedures is especially important to monitor.

Subsequently, John Kim, our CCGA representative also provided us with a summary of recent, point-by-point commentary on some aspects of the proposal at CCGA, as well as with an interlaced discussion of the currently circulating policy on SSP's that the discussion seems to have spawned. We provide these points here for your advice and note that Graduate Council supports these as well.

1. PDST Implementation Protocols (p. 1, Item I.B.): Require the President to notify the Academic Senate before changes can be made to the implementation protocols.
2. PDST Implementation Protocols (p. 9, Item VIII.B): Require the President to consult with the Academic Senate when deciding if a regular academic program can become a PDP.
3. SSP Policy (Section H): The CCGA calls for clearer wording for a PDP's conversion to an SSP. It requests the following wording: "Converting an existing state-funded program to SSGPDP [a.k.a. SSP] is regarded as exceptional. Special justifications must be given for a

conversion application to be approved. For example, clear and overwhelming evidence must be provided to demonstrate that the existing state-funded model is no longer feasible or has unduly restricted the development of the program.”

4. SSP Policy (Section O): Make the financial models for PDPs and SSPs more alike, such that SSPs must also pay a financial aid “tax.”
5. SSP Policy (Section O): If item 3 above is not feasible, then SSPs should at least be required to collect the same accessibility data as is currently proposed for PDPs.

Finally, to be perfectly frank, we spent most of the time at our meeting on the general problem of proliferating documents regarding SSP’s and PDP’s, and the growing inability for all of us to differentiate between them adequately so as to have meaningful, productive discussion. Increasingly, Graduate Council members find it difficult to interpret exactly what is going on and to what issues we should (or should not) be paying specific attention. Thus, we wish to say emphatically at this point that we would value an overarching policy document on all issues regarding PDP’s and SSP’s from the Academic Planning Council (which Dean Childers assures us should be forthcoming in March).



February 5, 2014

To: Jose Wudka
Chair, Riverside Division Academic Senate

Fr: Kenneth Barish
Chair, Committee on Planning and Budget

Re: Review of the Proposed Policy on Professional Degree Supplemental Tuition

The Committee of Planning and Budget has reviewed UCOP's proposed revisions to the Professional Degree Supplemental Tuition (PDST) policy and implementation protocol. The revisions appear to largely add detail rather than significant policy changes, but a summary of any substantial changes to the policy should be included with the proposed revisions to help with the evaluation.

The committee did have the following comments:

- 1) It would be better to consider the PDST and SSGs together as an integrated plan and which clearly distinguishes the two.
- 2) The description of the characteristics of PDSTs should be more clearly defined (section VIII).
- 3) A statement emphasizing that academic excellence is a requirement (and of central importance) should be added.



Office of the Dean
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Fax 951.827.3188
www.engr.ucr.edu

January 30, 2014

TO: Jose Wudka, Chair
Riverside Division

FR: Akula Venkatram, Chair
Executive Committee, Bourns College of Engineering

RE: Proposed Policy on Professional Degree Supplemental Tuition

The Bourns College of Engineering Executive Committee discussed the drafts for Regents Policy 3103: Policy on Professional Degree Supplemental Tuition (PDST) and its Presidential Policy Implementation Protocols. BCOE supports the broad goals of the policy to allow an individual program to increase tuition to fund its growth if the demand for the program justifies it. However, the implementation of the policy raises several concerns:

1. The criteria that a program has to meet to gain approval to implement the policy, while very detailed, appear to be onerous enough to discourage a program from applying for supplemental tuition.
2. Implementation may eventually stratify the financial structure of professional programs in the UC systems and create different tiers of professional schools that may undermine the uniformity of high quality education among different UC campuses.
3. The policy does not explain explicitly whether the PDST revenue would affect the level of core UCOP funding for the professional programs.

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EXECUTIVE COMMITTEE:
COLLEGE OF HUMANITIES, ARTS, AND SOCIAL SCIENCES

RIVERSIDE, CALIFORNIA 92521-0132

February 3, 2014

TO: José Wudka, Chair
Academic Senate

FROM: Erica Edwards, Chair
CHASS Executive Committee

RE: Regents Policy 3103: Policy on Professional Degree Supplemental Tuition

The CHASS Executive Committee discussed the issues related to the Regents Policy 3103: Policy on Professional Degree Supplemental Tuition. The committee agreed with the two draft documents without comments.

Erica Edwards, Chair

UCR CHASS Executive Committee

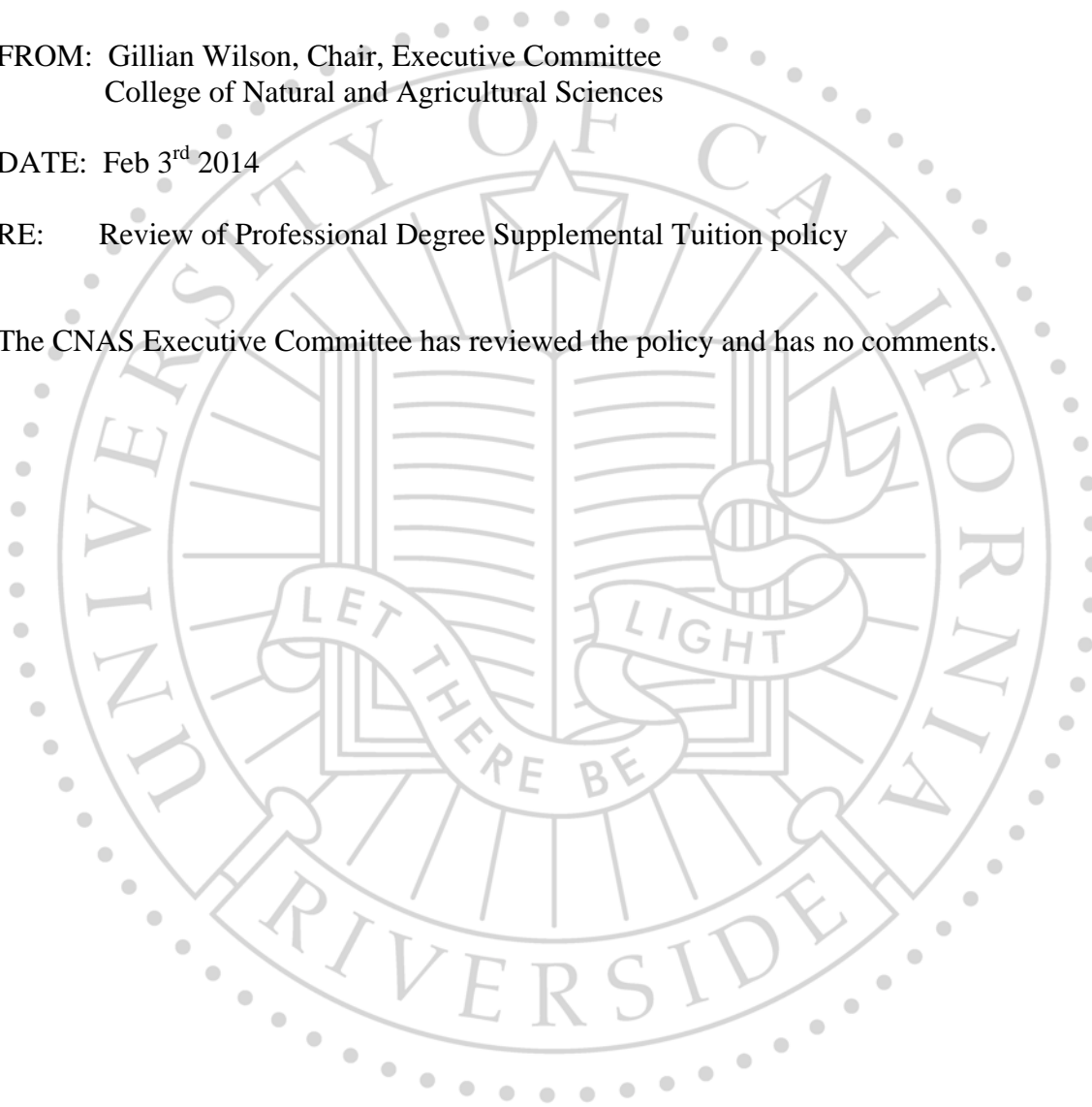
TO: Jose Wudka, Chair,
Riverside Division

FROM: Gillian Wilson, Chair, Executive Committee
College of Natural and Agricultural Sciences

DATE: Feb 3rd 2014

RE: Review of Professional Degree Supplemental Tuition policy

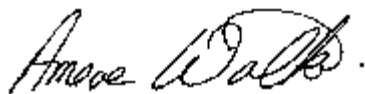
The CNAS Executive Committee has reviewed the policy and has no comments.



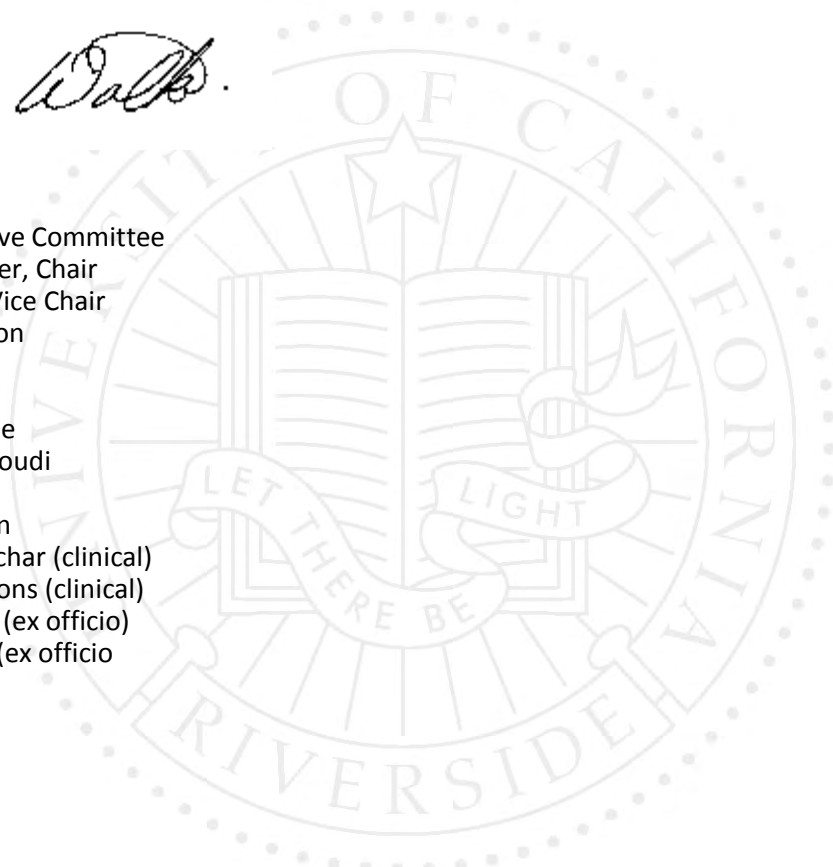
Division of Biomedical
Sciences
School of Medicine
Riverside, CA 92521
Tel (951) 827-5942

To: Jose Wudka
Chair, Riverside Division
From: Ameae Walker
Chair, SOM executive committee
Re: Professional Degree Supplemental Tuition policy

The SOM executive committee discussed the proposed supplemental tuition policy at its January 14th, 2014 meeting. The Committee had no concerns.



SOM Executive Committee
Ameae Walker, Chair
Paul Lyons, Vice Chair
Monica Carson
Iryna Ethell
David Lo
Christian Lytle
Ilhem Messaoudi
Neal Schiller
Emma Wilson
Mahendr Kochar (clinical)
Emma Simmons (clinical)
Richard Olds (ex officio)
Phyllis Guze (ex officio)





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Farid Chehab, PhD, Chair
Ruth Greenblatt, MD, Vice Chair
Paul Green, PhD, Secretary
Anne Slavotinek, MD, Parliamentarian

February 25, 2014

William Jacob, PhD
Academic Council Chair
University of California
1111 Franklin Street
Oakland, CA
william.jacob@ucop.edu

Re: Proposed Regents Policy 3103: Policy on Professional Degree
Supplemental Tuition (PDST)

Dear Chair Jacob,

The San Francisco Division of the University of California Academic Senate appreciates the opportunity to review proposed Regents Policy 3103: Policy on Professional Degree Supplemental Tuition (PDST) and the draft proposed implementation protocols document.

The San Francisco Division Graduate Council and the Faculty Councils of the Schools of Dentistry, Medicine, Nursing and Pharmacy reviewed the proposed revisions. The Faculty Councils did not provide comment on the draft policy. Graduate Council raised a concern about how programs with Professional Degree Supplemental Tuition (PDST) will be differentiated from Self Supporting Graduate Professional Degree (SSGPDP) programs.

We look forward to working with you and our colleagues to provide the Academic Senate response to UC leadership regarding the proposed revisions.

Sincerely,

A handwritten signature in black ink, appearing to read "Farid Chehab", is written over a faint, circular seal of the University of California.

Farid Chehab, PhD,
Chair, UCSF Academic Senate



ACADEMIC SENATE
Santa Barbara Division
1233 Girvetz Hall
Santa Barbara, CA 93106-3050

(805) 893-2885
<http://www.senate.ucsb.edu>

Kum-Kum Bhavnani, Chair
Deborah Karoff, Executive Director

February 19, 2014

Bill Jacob, Chair
Academic Senate

RE: Policy on Professional Degree Supplemental Tuition-Proposed Revisions

Dear Bill,

The UCSB Division distributed the revisions to the Professional Degree Supplemental Tuition Policy to the following groups: Council on Planning and Budget (CPB), Graduate Council (GC), Council on Research and Instructional Resources (CRIR), Committee on Diversity and Equity (CDE), and the Faculty Executive Committees from Engineering, Bren, Letters and Science, Education, and Creative Studies. As you may know, UCSB has just received approval (Spring 2013) for our first professional degree program, and thus consider ourselves to be in an especially unique position to comment on the draft policy. The following chose not to opine: Council on Research and Instructional Resources (CRIR), Engineering Executive Committee, Letters and Science Executive Committee, and College of Creative Studies Executive Committee. We summarize the comments from the groups who chose to opine.

Graduate Council (GC) urges that, given the lack of clarity in the policy and the implementation criteria, the documents be revised and distributed for a second review. Their main concern is the "lack of stated principles for determining whether a program should be offered as a state-supported professional program or a self-supporting graduate professional degree program (SSGPDP)". This is critical, they suggest, so that there may be a consistent approach to the development and review of new professional degree programs.

Quoting Regents Policy 3103: Policy on Professional Degree Supplemental Tuition:

- *Section 4b.i. requires that "Current base levels of institutional financial aid shall be maintained and an amount equal to at least 33 percent of new PDST revenue shall be dedicated to financial aid for students in programs charging PDST."*

GC asks where the financial aid funding will be administered.

They also ask, in light of Regents' Policy 3103:

- *Section 4b.ii. states “Campuses reserve the discretion to supplant the 33 percent of new PDST revenue financial aid requirement with other fund sources not specifically designated for student financial support.”*

What would be the rationale for establishing such an arrangement?

- *And, in light of Section 4b.iv., which requires that “Campuses will regularly evaluate and report on the effectiveness of these financial aid measures.”*

GC asks, how often is regularly, and by what process?

Graduate Council raises further questions, following its close reading of the *Presidential Policy Implementation Protocols for Regents Policy 3103: Policy on Professional Degree Supplemental Tuition*. Each of their questions is underlined following the relevant paragraph in the policy.

- *Section I.B states that “Per the Policy, changes in these protocols can be made at the discretion of the President or his/her designee and only after consultation with students, faculty, and administrative leadership per the following: (1) For substantive changes, the convening of a systemwide and representative task force is needed; and (2) Minor or technical changes can be made at the discretion of the President or his/her designee with notification to student, faculty, and administrative leadership.”*

There is no indication of who determines whether the changes are substantive or not, and what the approval process is for substantive changes to the implementation protocols.

- *Section II.C notes that Chancellors will review PDST proposals and supporting plans, and submit proposals as revised to the Office of the President.*

Will there be review by any other agencies (Graduate Division, Academic Senate)?

They also make the following suggestion regarding the arrangement of the different sections:

- *Section III could be rearranged for clarity. For example, B and F could be combined or at least placed in succession and C and D could be combined.*
- *Section V.F notes that “Financial aid planning should be discussed during student and faculty consultation. Program faculty and students, and well as the campus graduate dean, are encouraged to assess a program’s financial aid strategy.”*

Consultation with the Graduate Dean should be required rather than encouraged.

- *Section V.I.C covers the consultation protocols for programs proposing to charge PDST for the first time, including existing or new programs. V.I.C. (2) states that “New programs or programs charging PDST for the first time may not have apparent direct or obvious student or faculty cohort to provide consultation. In these cases, programs should seek consultation with graduate academic and professional students and faculty in closely related established programs or groups who are reasonable approximations of the program student and faculty population. Additional stakeholders, such as future employers, should also be consulted.”*

Such a requirement seems overly burdensome for program initiators, and the value of this exercise for new programs isn't entirely clear.

Finally, GC suggests that the Regents consider adding a second date for their review of PDST proposals, specifically to discuss PDST for new programs, in order to ensure that recruitment and the implementation of new programs is not hampered due to the one Regents' meeting a year policy at which PDST is discussed.

The Council on Planning & Budget "endorses sensitivity to the potential negative effects of supplementary tuition on diversity and student debt, but feels that the detailed financial data stipulated in this regard may be too onerous. All programs must meet normal expectations both in terms of academic excellence and diversity. We feel that a requirement for consultation with students and faculty in the process of requesting supplementary tuition should remain in the proposal, but that the micro stipulations as to how this be done would be best left to the units requesting the supplementary tuition."

The Committee on Diversity and Equity reviewed the Professional Degree Supplemental Tuition Draft and were pleased that diversity issues were carefully addressed during the drafting of the policy. However, CDE is concerned that the lack of concrete goals may not allow PD programs to meet the diversity desires stated in the policy.

The Bren School Faculty Executive Committee (FEC) recommends changing, in the first sentence, "shall" to "may" as the present wording is too prescriptive in a policy that requires considerable flexibility. They suggest the first sentence read as follows: "Professional Degree Supplemental Tuition (PDST) may be assessed to students enrolled in designated graduate professional degree programs in order to achieve and maintain excellence so that these programs remain among the best in the country, public or private."

The consensus from the Education Faculty Executive Committee is to support the policy but to consider revisions in light of the critiques from Council of Vice-Chancellors. There is also a concern amongst the Education FEC members that this policy could result in a lowering of funding of programs at the University level if departments are assumed to collect additional fees and tuition.

Given the substantive concerns expressed by Graduate Council, and the other concerns referred to, above, the UCSB Division recommends that revisions be made to the policy and a second review take place shortly thereafter.

Thank you for the opportunity to comment.

Sincerely,



Kum-Kum Bhavnani, Chair
Santa Barbara Division



OFFICE OF THE ACADEMIC SENATE

9500 GILMAN DRIVE
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TELEPHONE: (858) 534-364
FAX: (858) 534-4528

February 22, 2014

Professor William Jacob
Chair, Academic Council
University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607-5200

Subject: Proposed Revisions to the Implementation Protocols and Draft Policy on Professional Degree Supplemental Tuition

The proposed revisions to the Regents Policy 3103 on Professional Degree Supplemental Tuition (PDST) and the accompanying Presidential Policy Implementation Protocol for Regents Policy 3103 were sent to the appropriate Divisional committees for review and comment and were discussed by email and at the February 10, 2014 Senate Administration Council meeting. Our comments and proposed clarifications are described below.

Our primary concern about the policy and implementation protocols is that they fail to provide sufficiently clear guidelines about how it will be determined if a new program is eligible for PDST or if it should be classified as a self-supporting graduate professional degree program (SSGPDP). This was also the case for the SSGPDP policy reviewed in January 2014. It is critical that these policies either provide clear guidelines for discriminating between PDST or SSGPDP programs, or, if this is not possible, that they directly address the challenges faced in making a clear distinction between these two types of programs, so the conversation can be shifted to finding potential solutions to this issue. The failure to resolve this matter could lead to problems during implementation and unnecessarily delay the launch of new degree programs.

We anticipate that it might prove difficult to develop and gain systemwide agreement about how to classify programs as either a PDST or SSGPDP, given the movement towards nontraditional modes of instructional delivery and distance learning in both state-supported and self-supported degree programs. Indeed, aside from the traditional PDST programs (such as the M.D.), UCSD Senate Council members were unable to reach a consensus about how to accurately classify new programs as SSGPDP or PDST. Should it be the case that the appropriate systemwide groups also fail to reach a consensus, we recommend that the policy be modified to specify that the initial judgment about whether a new program is to be proposed as a PDST or SSGPDP be made at the campus level and then,

if it is judged likely to be PDST eligible, that the proposal be forwarded to UCOP for a final decision.

It is not clear why aspirational comparators should be only rarely included in the set of comparator institutions. The inclusion of aspirational peer institutions within a larger set of peer institutions would illustrate the academic potential of a program and set a clear metric for determining if a program is achieving its potential. Aspirational institutions might also prove useful when setting the level of PDST, as it could illustrate how this might change in the future, should the program consider investing additional funds in order to reach its academic potential.

The table in the Implementation Protocols indicates that the Academic Senate should be consulted during the setting or changing of PDST levels, but this is not clearly specified in the text. Indeed, if the faculty executive committee is meant to specify the Academic Senate Executive Committee (or its equivalent), then it would appear that Senate engagement in this decision is optional due to the use of “or” in the phrase “...executive committee or other faculty leadership”. We recommend that Section VI.A.1 be changed to read:

(c) Academic Senate Executive Committee (or its equivalent) and other appropriate faculty and affiliated faculty leadership.

The current policy specifies that revenue from PDST programs remain on the campus, but the new policy does not specify the disposition of such revenues. Although one might reasonably expect that nothing has changed in this regard, it would be best if the policy were clear on this point.

Thank you for the opportunity to comment on this policy and implementation guidelines.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kit Pogliano". The signature is fluid and cursive, with the first name "Kit" written in a slightly larger, more prominent script than the last name "Pogliano".

Kit Pogliano
Chair
Academic Senate, San Diego Division

cc: Divisional Vice Chair Gerry Boss
Divisional Director Ray Rodriguez
Executive Director Martha Winnacker



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February 20, 2014

William Jacob, Chair
Academic Council

Re: Professional Degree Supplemental Tuition (PDST) Policy Proposal

Dear Bill,

The Santa Cruz Division has reviewed the proposed Regents Policy 3103: Policy on Professional Degree Supplemental Tuition (PDST). Our Committees on Affirmative Action and Diversity (CAAD) and Planning and Budget (CPB) along with our Graduate Council (GC) responded with significant concerns.

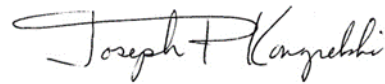
One primary concern was that of access, with the committees agreeing that accessibility must remain at the forefront of the PDST policy. The current proposal pays a high degree of attention to the need to monitor and evaluate PDST programs' accessibility to people of lesser economic means, but falls short of ensuring access in a world of greatly expanded PDST and Self-Supported Programs (SSP). While appreciative of the policy's recommendations for financial assistance, we point out that the PDST model itself functions to discourage low-income students from even applying. Studies have suggested that the presence of financial aid does little to encourage low-income applicants in the face of "sticker shock" from the cost of tuition. In light of this, GC suggested that the policy include the implementation of the systematic collection of data on access to these programs. This data, along with an established methodology for analysis, would allow the University to comprehensively assess the overall impact of the shift from state-supported to tuition-supported programs on accessibility to UC graduate education. This suggestion was derived from correspondence between the systemwide Coordinating Committee on Graduate Affairs (CCGA) and the Office of the President (UCOP) in June 2008. As an additional check, the campus committees charged with promoting diversity of the student body ought to participate in the review of individual programs and the overall state of access to PDST (and SSP) programs.

Another common concern from our committees centered on the campus infrastructure assumed by this policy. In the vein of accessibility, the policy calls for establishment of loan forgiveness programs for students. Our campus is not prepared for such an arrangement even at the campus-wide level, much less at the level of individual programs. We currently handle only "front-end" aid (e.g. fellowships) and this policy would require our campus to develop new structures,

policies, and procedures for “back-end” aid (e.g. loan forgiveness). Beyond the infrastructure concerns, we question the value of loan forgiveness programs that would necessarily have to be funded either by decreasing “front-end” aid or by increasing PDST. The goal to “develop and maintain strategies and resources that will enable graduates to pursue lower-paying public interest careers” is laudable, but loan-forgiveness programs—and the burdensome implementation associated with them—are not necessarily the most effective means of promoting access to disadvantaged groups. Campus-level infrastructure is assumed elsewhere in this policy. For example, the process for requesting PDST—including the necessary documentation justifying fee increases—comes with an excessive administrative burden.

This assumed infrastructure disadvantages younger campuses (like ours) that are only now beginning to flesh out the academic offerings with significant PDST program enrollments. Equally damaging is the higher bar for approval of PDST laid out in this policy. The procedures for justifying fee increases, such as the requirements that most comparator institutions be public and the discouragement of aspirational comparators, are cumbersome when approval is for only a maximum of three years. Also, it would be very desirable to reduce, as much as possible, the requirements for Regents’ approval of fee increases. Our campus was harmed last year when several of our new programs’ fee schedules were put on hold pending Regental approval of existing fee increases. That hold impaired roll-out plans and financial viability. Since Self-Supporting Programs (SSP) are instead approved by the President, there will be pressure, here as well as on campuses with existing SSPs, to convert programs that might better remain as PDSTs.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Konopelski". The signature is fluid and cursive, with the first name "Joe" and last name "Konopelski" clearly distinguishable.

Joe Konopelski, Chair
Academic Senate
Santa Cruz Division

cc: Kimberly Lau, Chair, Committee on Affirmative Action and Diversity
Dan Friedman, Chair, Committee on Planning and Budget
Bruce Schumm, Chair, Graduate Council

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COORDINATING COMMITTEE ON GRADUATE AFFAIRS (CCGA)
Donald Mastronarde, Chair
djmastronarde@berkeley.edu

ACADEMIC SENATE
University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607-5200

January 21, 2014

ACADEMIC COUNCIL CHAIR WILLIAM JACOB

Re: Senate Review of Draft Policy on Professional Degree Supplemental Tuition (PDST)

At its meeting of January 8, 2014, CCGA discussed at length the two related revised policies (SSGPDP and PDST) along with their implementation protocols. SSGPDP had also been discussed at the previous meeting and several times during the period when the task force was working on the revision.

CCGA appreciates very highly the effort of all involved in the two task forces and compliments them on the great improvement in clarity and specificity that has resulted.

In general, CCGA members have a strong attachment to the values of public education and regret the fact that more extensive use of these alternative funding mechanisms has become necessary. They nevertheless recognize the new realities with which the University has to cope and accept their responsibility, on behalf of the Academic Senate, for assessing and ensuring the high quality of UC graduate degrees of all kinds.

CCGA's major anxieties continue to center around (1) the difficulty or impossibility of distinguishing between PDST-eligible and SSGPDP-eligible programs; (2) the possibility that there may be a significant number of programs that choose to convert from PDST to SSGPDP; and (3) the question on whether UC can maintain its commitment to providing very wide access to the highest levels of education when more and more programs move toward charging market-driven fees (this commitment has important implications for state support of UC).

The remainder of this memorandum comments on the PDST documents, but it should be considered in conjunction with the parallel memorandum on the SSGPDP documents.

Most of the points we want to raise are small details of exact wording or intention.

POLICY p. 2, Item (4) b.i (also ii and iii): we find it confusing that the adjective "new" is included in these sentences ("of new PDST revenue"). The 33% rule applies whether the PDST is being newly proposed or has been in existence for some time, and it applies equally to the first approved level of PDST and to any increased amount that may be approved subsequently. Can this adjective be deleted?

POLICY p. 2, Item (4) b.ii: it was not immediately clear to many of us what is the intention of the provision about "supplanting" the 33% of PDST revenue intended for financial aid. We conjecture that this allows for some shuffling of expenses from one source to another, but we are uncertain why the supplanting funds are not directly applied to the (non-financial aid) expenditures toward which the supplanted 33% PDST revenue is apparently being redirected. The latter method seems to us to be a more transparent accounting process.

IMPLEMENTATION, p. 1, Item I.B: we would prefer to see the word “prior” added before “notification” in the last sentence. We concede the propriety of making minor or technical changes without convening a task force, but believe that prior notification is necessary to ensure that those with an interest in the policy agree that the change is minor or technical before it becomes effective. Perhaps this was the intention, but if so, it would be clearer if “prior” is added.

IMPLEMENTATION, p. 1, Item II: we note that the policy rightly uses the indefinite term “multi-year” and leaves it to the implementation protocols to establish the “three-year” cycle for planning. CCGA members understand why “multi-year” appears in the heading of item II, but are not sure why in a few later places the phrase “multi-year” appears instead of “three-year” (which is used many times from this point onward). Are those usages (Item V preamble; VII.A) deliberate?

There is one issue that we regard as more significant, since it impinges on shared governance.

IMPLEMENTATION, p. 9, Item VIII.B: we agree with the philosophy behind determining eligibility on a program-by-program basis (once Ph.D. and Master’s degrees on the way to Ph.D. are excluded, as in VIII.A). The Academic Senate, through CCGA, would be involved in assessing appropriateness when a new PDST degree is proposed, but this policy makes no reference to consultation of the Academic Senate in the case of existing degree programs that apply to initiate PDST. The criteria (a, b, c) specified seem to us to be ones that entail academic judgments, and we would like to see acknowledgment of the need for consultation. It is not only a matter of shared governance, but of keeping the administration and CCGA on the same page in thinking about the problem of distinguishing “professional” degree programs.

Sincerely,

A handwritten signature in black ink, reading "Donald J. Mastronarde". The signature is written in a cursive, flowing style.

Donald Mastronarde, Ph.D.
Chair, CCGA

Copy: Martha Winnacker, Academic Senate Executive Director
Prof. John Kim, CCGA Lead Reviewer
Clare Sheridan, Principal Policy Analyst, Academic Council
Todd Giedt, Academic Senate Associate Director



UNIVERSITY COMMITTEE ON PLANNING AND BUDGET (UCPB)

Donald F. Senear, Chair

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February 20, 2014

WILLIAM JACOB, CHAIR
ACADEMIC COUNCIL

Re: Professional Degree Supplemental Tuition

Dear Bill,

The University Committee on Planning and Budget (UCPB) has discussed the [proposed revised policy](#) for the proposal and approval of PDSTs and changes to PDST levels ([Regents Policy 3103](#)), along with a separate set of Presidential Implementation Protocols. The revised policy incorporates a set of principles for PDSTs currently in [Regents Policy 3104](#).

In general, UCPB found the revisions of current policy to be reasonable; however, the implementation protocols seem quite complicated and even problematic in some places, and this is also true of the existing policy.

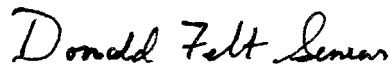
The policy continues to require units charging PDSTs to submit multi-year plans that describe intended uses and provide specific market- and program-based justifications for PDST revenue. One of the main differences between the old and revised policies seems to be that under current policy, units are required to submit multi-year plans for PDSTs once every three years, but the Regents only approve one year of it at a time. Under the proposed policy, multi-year plans would be submitted as they are now, but the Regents would approve the full three year plan at once and not have to do an action each year. Under both policies, if a program proposes a higher fee than what they had submitted under the multi-year plan, they must resubmit a new multi-year plan. These changes seem useful to UCPB to the extent that they reduce the public attention on annual PDST approval and reduce the workload on the campuses by making approvals a three year cycle and not an annual effort, which will also allow programs to better plan by avoiding having fee actions at the last minute.

UCPB also supports the policy's continued emphasis on access and financial support to ensure affordability to diverse groups, to the extent that it asks programs charging PDSTs to emphasize affordability and access to low income groups, to achieve low debt outcomes, and to consider loan relief for graduates who pursue low-paying public interest jobs.

The main discussion at UCPB concerned the definition of graduate degree programs that are eligible to charge PDST in section VIII (policy clause 7) of the Presidential Implementation Protocols UCPB supports the apparent effort to limit the range of programs that might be considered as a professional degree program; the definition should not be so broad that it provides an incentive for every program to claim that it is professional. However, we are also concerned that the proposed definition's focus on licensure and certification may be too narrow, given that there are existing professional degree programs where that definition is not met. It may be necessary to explicitly grandfather some existing programs. But we also recommend that the definition be reconsidered and revised. One goal should be to broaden the definition to encompass existing programs that do not lead to licensure but are traditionally understood to be professional degree programs. Business administration is a prominent example. The definition should also allow the possibility that programs that may be theory- or research focused, in addition to training an individual for a particular job or career, could be included under specified circumstances. An example of such a program might be a focused MS degree within an engineering department.

In addition, UCPB found that reviewing this policy side by side with the self-supporting graduate professional degree policy (SSGPDP) presents the Senate with a useful opportunity to consider larger issues related to the role of high fee market-aligned programs in the university's overall mission. UCPB would like to echo some of the concerns it expressed in its recent SSGPDP letter. Namely, we are concerned that: there is little in either policy about academic quality or outcomes; that the university should not incentivize the conversion of existing academic graduate programs to graduate professional degree programs; and that a public university should not necessarily follow the market but offer a lower cost option than a private university for a similar program.

Sincerely,

A handwritten signature in black ink that reads "Donald Felt Senear". The signature is written in a cursive, flowing style.

Donald Senear
UCPB Chair

cc: UCPB
Martha Winnacker, Senate Executive Director