UNIVERSITY OF CALIFORNIA, ACADEMIC SENATE

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William Jacob Telephone: (510) 987-9303 Fax: (510) 763-0309

Email: William.Jacob@ucop.edu

Chair of the Assembly and the Academic Council Faculty Representative to the Board of Regents University of California 1111 Franklin Street, 12th Floor Oakland, California 94607-5200

February 7, 2014

AIMÉE DORR PROVOST AND EXECUTIVE VICE PRESIDENT UNIVERSITY OF CALIFORNIA

Re: Review of proposed revisions to the Self-Supporting Graduate Professional Degree Programs Policy

Dear Aimée:

The Academic Council discussed the proposed revision to the policy on Self-Supporting Graduate Professional Degree Programs at its meetings on January 29 and February 5. Council appreciates the consultative process that you led that generated the proposed revision, as well as the effort to address conversions and include new annual reporting requirements. Council also recognizes the need for and desirability of alternate funding mechanisms. However, multiple Senate divisions and committees identified fundamental issues that still require clarification. *Council unanimously agreed that the policy needs further revision to meet serious concerns and that another review will be necessary.*

Rationale for and Definition of a Self-Supporting Program

Nearly every response to the review expressed concern that the draft provides no principles for identifying the conditions under which it is appropriate to offer self-supporting professional degree programs. Specifically, by eliminating the four criteria, one of which must be met before a program can be approved for self-supporting status under the existing policy, the revision leaves no principle that distinguishes SSGPDPs from state-supported programs that charge Professional Degree Supplemental Tuition (PDST). Council does not insist that SSGPDPs be limited to programs offered in certain formats or on certain schedules as implied by the existing four criteria, but it feels that some set of conditions is essential before the policy can move forward. A robust discussion will be necessary before there is widespread agreement on what those conditions should be. Hence, Council's belief that another review is necessary.

The proposed revised policy offers no academic criteria for establishing SSGPDPs. There is significant concern that this silence may encourage programs to seek conversion from PDST to SSGPDP status for purely financial reasons. Council believes that academic decisions should not be driven solely by revenue potential (UCSB, UCPB). Any perception that they are could ultimately

cast doubt on the legitimacy of SSGPDPs, particularly conversions. The divisions also asked: What characteristics make a program "professional"? (UCM, UCSF) How can UCOP ensure that the policy will be consistently applied sans criteria? (UCR) Council strongly recommends outlining criteria that address these questions, as well as what distinguishes SSGPDPs from state-supported programs that charge PDSTs. Without such criteria, there are no guidelines to help evaluate whether a self-supporting program proposal is appropriate. In addition, Council supports the Berkeley Division's suggestion that the SSGPDP proposal be considered in conjunction with the policy on professional degree supplemental tuition.

Ensuring financial accessibility and diversity

Council strongly feels that in accordance with the University's public educational mission, SSGPDPs must be financially accessible. As UCSC notes, "There is a seeming contradiction between having a program financially supported completely by students and having a program that is accessible to a diverse group of students." Therefore, it is particularly important that policy set guidelines that programs have clear accessibility and diversity plans and include regular monitoring of the diversity of their student populations.

While the policy should not mandate specific targets or formulas, it should require a discussion of the demographic characteristics of students the program expects to serve, as well as diversity goals and a plan to achieve those goals. Council notes that students from various income levels could benefit from most programs. For instance, those working in non-profit organizations may be interested in Executive MBAs or law programs, and programs that cater to employed professionals should not overlook such potential students. Council supports Section O, in the policy, which requires proposals to specify financial accessibility goals and financial support plans for achieving those goals. (UCD, UCI, UCM, UCR, UCSD, UCSF, UCSC, CCGA) An expectation of some degree of return-to-aid might be one policy lever to achieve this, provided that it is flexible enough to allow for different structures based on careful review of the character of specific programs and their target audiences. Council concurs with CCGA's recommendation that student financial support be reported and monitored in a way similar to what is required by the proposed PDST policy.

Effect on existing state-supported programs and the role of faculty

Many Senate bodies expressed concern about the potential for SSGPDPs to divert faculty effort or department and campus funds from core state-supported programs. Mechanisms must be defined to ensure that SSGPDPs do not harm state-supported programs or faculty research productivity. CCGA suggests ensuring that new self-supporting programs do not duplicate existing state-supported programs.

There is an inherent tension between the Senate's role in guaranteeing the quality of all academic programs and the potential of SSGPDPs to divert resources from departments' core educational mission. As UCPB notes, involving ladder-rank faculty in SSGPDP teaching roles "can only be accomplished by sacrificing some existing activity. And if the courses are taught largely or entirely by non-ladder faculty there is a potential for sacrifice of academic quality."

There was no consensus on whether the policy should address faculty workload issues through buyout or overload teaching. But the Council strongly felt that the balance of Senate and non-Senate faculty in SSGGPDPs should be similar to that in related state-supported programs unless there is clear justification. This provides flexibility for programs that are mandated by accreditation agencies

or by the state to employ practitioners as instructors. (UCB, UCD, CCGA) Council also recommends that the policy explicitly require that Senate faculty retain oversight of SSGPDPs and that Senate faculty direct the programs in order to ensure their quality.

Finally, Council recommends that campus Graduate Divisions regularly assess the campus' overall portfolio of self-supporting programs in terms of their effect on the core academic mission. The Graduate Division should submit this report to the divisional Graduate Councils, as well as to the systemwide Provost and to CCGA.

Further Comments

The letters received by the Academic Council raised a number of additional issues that ought to be considered as the revision proceeds. Some of these issues may be resolved through implementation guidelines rather than policy, but nonetheless they deserve attention.

- Several respondents recommended that SSGPDPs should be subject to regular academic program reviews and that the Senate's authority over the approval and periodic review process should be explicated in greater detail. (UCLA, UCM, UCSF) Council concurs with UCLA's suggestion that new programs be initially reviewed within three years of their establishment and thereafter on the regular review cycle.
- The policy should make it clear that its policies set minimum standards expected of all SSGPDPs and that it does not negate any additional requirements a campus might choose to impose.
- Will the new policy apply to existing self-supporting programs? If so, how will it be phased in? (UCB, UCR)
- The policy should specify criteria that will clearly limit conversion to programs meeting those criteria, thereby clarifying that "infrequent and uncommon" is not merely a description, but a policy prescription. (UCSD, CCGA)
- A potential conflict of interest exists if the department or entity that could benefit from revenues generated by the self-supporting program has final oversight of that program. (UCPB)
- The clause in the previous policy stating that revenue from SSGPDPs may be directed toward core academic programs should be reinstated. (UCSD, UCSB, CCGA)
- What principles should guide fee setting? Should fees be set based on market criteria? Should infrastructure and pension and benefits costs be included in determining fee levels? (UCSB, UCEP)
- Will students in self-supporting programs be allowed to enroll in courses taught in state-supported programs and vice versa? How should tuition be assessed? (UCR, UCSF, UCSB)
- The policy should require that specific funding sources to cover the SSGPDP's start-up period be identified in the program proposal (UCR, UCSD), for program reviews (UCSD), and for exit paths in case of failure. (UCSB)
- The term "ladder rank faculty" should be replaced with "Senate faculty," as the latter includes all Senate faculty title series and is more applicable to the medical schools and other practice-oriented fields. (UCSF, CCGA)

Finally, several divisions have spent considerable effort developing their own campus policies on self-supporting programs. Council also recommends that UCOP examine these policies as a source of best practices.

Council recognizes and greatly appreciates the effort by the subcommittee of the Academic Planning Council that drafted the proposed policy revision. Council also appreciates the thoughtful comments offered by Senate bodies that opined. We hope that the next revision will take Senate comment into consideration and mitigate, if not resolve, the tensions identified in the policy.

Please do not hesitate to contact me with any questions.

Sincerely,

Bill Jacob, Chair Academic Council

Cc: Academic Council

Martha Winnacker, Senate Executive Director Todd Greenspan, Director of Academic Planning



January 28, 2014

WILLIAM JACOB Chair, Academic Council

Subject: Proposed Revised Self-Supporting Graduate Professional Degree Programs Policy

Dear Bill,

On January 27, 2014, the Divisional Council (DIVCO) of the Berkeley Division discussed the proposed revised Self-Supporting Graduate Professional Degree Programs Policy, informed by reports of our divisional committees on Academic Planning and Resource Allocation (CAPRA), Budget and Interdepartmental Relations, Educational Policy, and Graduate Council.

The proposed revisions are rather complex, and we believe merit thoughtful consideration. The discussion in DIVCO raised a number of serious concerns, as described in CAPRA's commentary, which is appended in its entirety. We note that self-supporting graduate professional degree programs currently offered at Berkeley are consonant with our campus policy. Therefore, we request that the Office of the President clarify how the proposed policy revisions relate to our existing campus policy (http://grad.berkeley.edu/program_proposal/self_supported.shtml).

Our discussion also underscored two issues related to the review process. First, we believe that this proposal should be considered in conjunction with the policy on professional degree supplemental tuition (PDST) as the issues addressed in each are clearly linked. Second, the proposal does not provide any background information, explanation of the concerns the revision is intended to address, or rationale for revising the policy at this time. In addition, we did not receive a redline version to facilitate our review. Going forward, we request that proposals forwarded for review meet these basic expectations.

In sum, we decline to endorse the proposal at this time.

Sincerely, Elizabeth Deaken

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

Eric Talley, Chair, Committee on Budget and Interdepartmental Relations

Ronald Cohen, Chair, Committee on Educational Policy

Mark Stacey, Chair, Graduate Council

Martha Winnacker, Executive Director, Academic Senate

Linda Song, Associate Director staffing Graduate Council

Aimee Larsen, Manager, Committee on Budget and Interdepartmental Relations Diane Sprouse, Senate Analyst, Committee on Academic Planning and Resource

Allocation

Linda Corley, Senate Analyst, Committee on Educational Policy

CAPRA Responses to: 1) the draft "Self-Supporting Graduate Professional Degree Programs Policy" and 2) Draft for Circulation "Presidential Policy Implementation Protocols for Regents Policy 3103: Policy on Professional Degree Supplemental Tuition

CAPRA's main recommendation is that on the Berkeley campus, and other campuses with their own successful policies governing self-supporting graduate professional degree programs (SSGPDPs), campus rules continue to govern the operation of SSDPs on those campuses, with the new UCOP policy affecting only campuses that do not have their own campus-specific SSGPDP regulations.¹

We also ask that the two new draft policies be carefully linked to existing UCOP policies 3103² and 3104,³ so that it is very clear exactly which of the existing policies are being changed and why.

Several more specific comments include:

1. Relationship between UCOP Draft Policies and Existing UCB policies: Given the existence of the Final Report of the Task Force on Self-Supporting Degree Programs, November 6, 2010 for the University of California, Berkeley, it is important that the two new draft policies clearly state how the two policies are intended to coexist, and which should take precedence in the event of a conflict with existing University of California, Berkeley policies for Self-Supporting Degree Programs and Professional Degree Supplemental Tuition. The statement in the section, "Policy Text", "However, nothing in this Policy is intended to prescribe campus policy or pre-empt a campus's discretion with respect to how it distributes resources with the exception that disallowed fund sources may be used to fund SSGPDPs." (page 3) does suggest that the University of California, Berkeley's policies, at least with respect to the distribution of resources, would remain intact. However, a clearly worded statement reiterating the intent of the new policies with respect to existing campus policies for existing SSGPDP programs is needed.

Again with reference to the 2010 report of the Task Force on Self-Supporting Degree Programs and comparing what is said in it to the language of the new proposal, it remains unclear whether or not existing self-supporting programs separate the funding streams as clearly as the proposed policy mandates, especially as regards faculty compensation. It is important that analysis be done to determine how the new policy will impact existing (currently successful) programs and if there needs to be a phasing in of the new policy for

¹ Self-supporting graduate professional degree programs on the Berkeley campus are governed by the rules laid out in the Final Report of the Task Force on Self-Supporting Degree Programs, November 6, 2010 (http://grad.berkeley.edu/program_proposal/tfssdp_report.pdf). This policy was drafted with great care to ensure that SSGPDPs on the Berkeley campus meet the specific needs of the campus, and is operating very successfully.

² http://regents.universityofcalifornia.edu/governance/policies/3103.html

³ http://regents.universityofcalifornia.edu/governance/policies/3104.html

⁴ http://grad.berkeley.edu/program_proposal/tfssdp_report.pdf

those programs that are currently structured differently from the proposed policy.

A final concern is that the Task Force report endorses ideas that are central to Berkeley Academic Senate concerns related to academic standards, which are not encompassed by the proposed UCOP policy. In particular, the Task Force report states that "The profile of faculty teaching in an SSGPDP must be similar to that in other programs in the school or college, in terms of the proportion of ladder-rank faculty..." The UCOP policy speaks of "comparable faculty" but defines it differently.

- **2. Comparable Faculty:** We ask for further clarification for Section F of the "Policy Text," which states "...the nature of certain practice oriented degree programs may warrant a higher proportion than usual of non-ladder faculty." (page 4). Since several existing SSGPDP programs on the Berkeley campus are explicitly designed to fund ladder faculty positions and to support a larger student body by funding the ladder faculty professoriate, it is not obvious why SSGPDPs would especially justify an expansion of the non-ladder faculty staffing of courses. Item F also appears to be at odds with statement D, again in the "Policy Text" stating that SSGPDP programs "are held to the same standards of quality as any other UC graduate professional degree programs" and to the University of California, Berkeley task force requirement, stated above, that the faculty teaching in state-supported and SSGPDPs should be equivalent.
- 3. Faculty Workload: We believe that further clarification is needed for section G of the "Policy Text." The statement, "Teaching in a self-supporting program does not constitute workload for purposes of State reporting," (page 4) is not clear as it stands. Is the proper interpretation of this statement that units must maintain careful accounting procedures to identify whether faculty time allocated to teaching in SSGPDPs represents either buyouts or additional compensation? An alternative interpretation is that the new policies are intended to introduce restrictions on a unit's ability to flexibly allocate faculty, who constitute a centralized resource within units, between the teaching needs and workload obligations of state-funded programs and SSGPDPs. The new policy appears to suggest that it will be more difficult to flexibly make such faculty time allocation decisions.
- 4. **Consultation:** We question the new requirement, stated in section O of the "Policy Text" that "...program characteristics and the level of student charges must be regularly sought from program stakeholders...Stakeholders must include students in and faculty from the program." (page 7) It is not clear why this policy is only applied to SSGPDPs, in stark contrast to similar tuition related decisions for state-supported masters programs, which are mandated to achieve the same level of quality and yet are not mandated to obtain student stakeholder consent on a regular basis. Since future student stakeholders are those that bear the consequences of such tuition decisions, it is not clear why current student stakeholders should be especially enfranchised to make decisions in which they have no financial stake (though we would be even more concerned if they did have a financial stake).
- 5. **Indirect Overhead Rate:** What is the reason underlying the idea that UC campuses should not be allowed to set their own internal overhead rate on SSGPDPs, and what is

the justification for UCOP's involvement in these internal decisions? Why shouldn't UCOP include these revenues along with all others in setting its overall tax on the UC campuses. Keeping the UCOP tax simple and establishing a single internal overhead rate at the level of the UC campuses allows for greater overall transparency.

- 6. **Financial Aid:** Paragraph 4bi of the draft implementation protocol for Regents Policy 3103 states 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."
 - a. We are, of course, supportive of ensuring access to a UC education. However, we are much less sure that this should apply to SSGPDPs, which are specifically designed to provide increased future earnings to their participants that will more than pay for the cost of the degree. In other words, the degree essentially provides its own financial aid.
 - b. Does "33 percent of new PDST revenue" refer to revenue in new SSGPDPs, or does this also apply to tuition increases in existing programs?
 - c. This condition directly conflicts with the goal of these programs to provide additional revenue to the University (for purposes including the provision of financial aid in other programs for which the financial payoffs to participants are less clear-cut), and could well make many or all of these programs no longer financially sustainable. What analysis has been done to ensure that this does not occur?

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

February 6, 2014

WILLIAM JACOB, CHAIR

UC Academic Council 1111 Franklin Street, 12th Floor Oakland, California 94607-5200

RE: Draft UC Policy: Self-Supporting Graduate Professional Degree Programs

The draft Policy on Self-Supporting Graduate Professional Degree Programs was forwarded to all Davis Division of the Academic Senate standing committees and Faculty Executive Committees from the Schools and Colleges. Responses were received from Graduate Council and the Committees on Research, Planning and Budget, and Elections, Rules and Jurisdiction, as well as from the Faculty Executive Committee from the College of Letters and Science.

The following summarizes responses received:

Graduate Council noted that graduate teaching should not be performed on an overload basis as a standard practice, regardless of whether or not the faculty member is compensated. This principle holds for all graduate programs regardless of funding method. Graduate Council was particularly concerned about whether diversity would be monitored for these programs outside of the standard program review process. Another concern was the treatment of financial accessibility. Graduate Council discussed the desirability of setting a default percentage of total tuition and fees due to financial aid from all sources.

Graduate Council also noted that Item F, regarding Comparable faculty, should clarify that the appropriate share of non-ladder faculty will vary depending on the educational objective of the program. The external and internal pressures for units and advanced degree programs to divert or convert human and infrastructural resources from existing graduate programs to SSGPDPs was also identified as a concern by Graduate Council. Additionally, Graduate Council believes the impact of the SSGPDs on existing undergraduate and graduate programs should be examined, as these potential effects did not seem sufficiently considered in the documentation received. The modifications from current policy were not completely clear, and Graduate Council would have appreciated that these changes be highlighted to facilitate its analysis of the proposed changes.

The Committee on Planning and Budget agreed with the overall draft Policy. However, the Committee noted that the Policy was not clear as to whether Item F, Comparable faculty, under Section III indicates that the teaching record in a SSGPDP course will be part of the merit and promotion process. If so, that should be more explicitly stated in the Policy.

The Davis Division of the Academic Senate appreciates the opportunity to respond to the draft UC Policy on Self-Supporting Graduate Professional Degree Programs (SSGPDP).

Sincerely,

Bruno Nachtergaele, Chair

Davis Division of the Academic Senate

Professor: Mathematics

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Office of the Academic Senate 307 Aldrich Hall Irvine, CA 92697-1325 (949) 824-2215 FAX

January 24, 2014

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

RE: Systemwide Review of the Revised Self-Supporting Graduate Professional Degree Programs (SSGPDP)

At its meeting of January 22, 2014, the Irvine Divisional Academic Senate reviewed the proposed revisions to the Revised Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy. The following Councils and Committees commented on the proposal and suggested the following modifications.

Graduate Council (GC)

The Graduate Council reviewed the proposed revisions and suggested the following:

- The policy should explicitly state that professional doctorates are eligible to exist as self-supporting programs.
- UCOP's fee template is not being used consistently across the system. According to the template, medical schools would never be able to sustain a self-supporting program based on the metrics of the template and therefore the use of the template is unbalanced. GC recommends that this inconsistency be addressed.
- While GC does not support a policy that specifies a percentage that should be returned to aid, it does believe that an accessibility plan should be addressed in the policy guidelines.

Council on Planning and Budget

The Council limits its views by and large to financial considerations with regard to the proposed policy revision, recognizing that other councils and committees may have concerns about, for example, the integrity of the academic mission.

While some clarification of what precisely constitutes a professional self-supporting graduate program and distinguishes such programs from other self-supporting programs is in order, we find that UCI's guidelines on the establishment of self-supporting programs are sufficiently capacious to render this lack of clarity irrelevant for our purposes. That is, UCI's guidelines cover all self-supporting graduate programs, of which professional self-supporting programs – whatever they are determined to be – are a subset.

Because the proposed policy enables and does not prescribe the establishment of new self-supporting graduate professional programs or the conversion of state-funded programs into the same, we do not find that it unduly imposes policy on the campus. UCI's guidelines, including financial guidelines and review procedures, which are in fact more restrictive than the current proposed UCOP policy revisions, would remain in force. Those financial requirements that are articulated in the proposed policy are, moreover, in keeping with UCI's current guidelines and policies (e.g., those regarding compensation for faculty).

If the proposed policy is adopted, UCI will need to update and revise its guidelines on self-supporting programs to ensure that the language of the two documents is consistent. For example, the proposed policy limits the terms "tuition and fees" to state-funded programs and uses "charges" for self-supporting programs; UCI's guidelines would need to be changed accordingly. Also, the current UCI guidelines would need to include language indicating that they cover not only new self-supporting programs but also possible conversions.

The Irvine Division appreciates the opportunity to comment.

Peter Krapp, Senate Chair

Peter Mapp

C: Martha Kendall Winnacker, Executive Director, Academic Senate



27 January 2014

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

Re: Systemwide Review of the Revised Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy

Dear Bill,

Thank you for the opportunity to review and opine on the Revised Policy for Self-Supporting Graduate Professional Degree Programs. Comments were solicited from the Graduate Council, the Committee on Planning and Budget, and the FECs of each of the schools. Most of the committees felt hurried by the timeline for their responses. Nonetheless, the responses were quite articulate about their concerns, especially those from the professional schools and the Graduate Council on which many of the reviewing responsibilities will fall. At its meeting on January 23, 2014, the Executive Board considered the policy and the comments of the committees.

Both the Council on Planning and Budget and the Faculty Executive Committee of the College were generally supportive of the new policy, finding it to be a strong framework that still left many of the details to departments and programs. Both, however, raised questions about elements of the proposed policy. Both expressed concerns about the impact of SSGPDP on teaching in regular state-supported programs, with the College FEC endorsing the proposal ONLY if the course buyout provision was deleted.

The Graduate Council's responses reflected what it has learned through its experiences in approving and reviewing self-supporting programs. In particular, the Council felt that the articulated financial accessibility goals required greater detail to ensure greater accessibility to these programs. Members of the Graduate Council were concerned that SSGPDPs might drain resources from state-supported programs. These were central concerns in the response from the Faculty Executive Committee of the Graduate School of Education and Information Science (GSEIS). Resources concerns were also important to the FEC of the School of Arts and Architecture (SOAA). It indicated that the policy needed greater clarity on who would shoulder the responsibilities for programs that failed.

The Graduate Council and the FECs of GSEIS and the School of Arts and Architecture argued that greater clarity was required for including self-supporting MA and MS programs as professional programs. Both suggested that perhaps all MA and MS degrees ought to be excluded as self-supporting degrees. The Faculty Executive Committee of the Henry Samueli School of Engineering and Applied Science (HSSEAS) echoed the preference for a better definition of what a professional degree program is. Its concern came from a slightly different direction based on its own very successful self-supporting masters degree. Recently ranked second among all online engineering programs in the United States, it wants to be able to recruit the best of the students in that program into its Ph.D. programs.

Finally, based on its own experiences in reviewing self-supporting programs, the Graduate Council recommended that SSGPDPs needed to be reviewed separately within three years of their inception, not necessarily waiting for the regular campus program review cycle for the host department. Not only would those reviews be useful for these new programs and the campuses of which they are a part. They would be useful for fine-tuning related policies at the UC and campus levels.

The HSSEAS FEC made two additional observations. The first was that the document as currently formulated seems to suggest that a new SSGPDP could be established based purely on financial considerations without attention to educational objectives. It felt that the language in Section III. A. encouraged that interpretation, as did the move away from the requirement that any SSGPDP must meet at least one of the following four criteria:

- 1. primarily serve a non-traditional population, such as full-time employees, mid-career professionals, international students, and/or students supported by their employers;
- 2. be offered through an alternative mode of delivery, such as online instruction or a hybrid model;
- 3. be alternatively scheduled, such as during evenings, weekends, and summers; and/or
- 4. be offered in an alternative location (e.g., off-campus centers)

Members of the Executive Board shared many of the concerns articulated by campus reviewers and felt that these were issues that deserved greater attention as the policy moves forward. Finally, however, the Executive Board agreed that the greatest strength of the draft policy was its acknowledgement in Section III.A. that "nothing in the Policy is intended to prescribe campus policy or pre-empt a campus's discretion with respect to how it distributes resources with the exception that disallowed fund sources may not be used to fund SSGPDPs." Our campus has already learned much from its existing self-supporting programs and hopes to incorporate those lessons in our own emerging self-supporting degree program policy. This document allows adequate space to let that happen.

Sincerely,

Jen Reiff

Jan Reiff

Chair, Academic Senate, 2013-2014

Chair, UCLA Academic Senate

cc: Martha Kendall Winnacker, Executive Director, Academic Senate Linda Mohr, Interim CAO, UCLA Academic Senate

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OFFICE OF THE ACADEMIC SENATE IGNACIO LÓPEZ-CALVO, CHAIR senatechair@ucmerced.edu

UNIVERSITY OF CALIFORNIA, MERCED 5200 NORTH LAKE ROAD MERCED, CA 95343 (209) 228-7954; fax (209) 228-7955

January 24, 2014

Academic Council Chair William Jacob

RE: Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy Review

Thank you for the opportunity to opine on the proposed revisions to the policy for Self-Supporting Graduate Profession Degree Programs (SSGPDP). Pursuant to your request the Merced Division Council, Standing and Executive Committees reviewed the proposal. Three Standing Committees (Graduate Council, Committee on Research, and Committee on Rules and Elections) provided the following comments and concerns.

The Graduate Council recognized the revisions define the policy existing for professional master's degree programs only, although professional programs are broadly defined, and explicitly acknowledge that such programs provide an additional revenue source in a climate of declining state funding. The 2011 policy has been changed from requiring programs to be delivered by non-traditional means (distance) and/or serving non-traditional populations such as full-time employees, midcareer professionals, and international students, to stating that these are typical features of self-supporting programs. SSPs are now allowed to serve students that have been traditionally served by the University's state-supported programs.

A positive interpretation of these changes is that barriers have been removed from forming self-supporting programs, allowing the University to serve more students and expand revenue generation. However, major concerns about the new policy include:

1. Ambiguity about what may be considered a "professional master's program". The Graduate Council notes that as the number of SSPs has grown systemwide, numerous new programs that fall outside the normal definition of a professional program have proliferated. The concern is that the most marketable aspects of state-supported programs might be packaged into SSPs for additional revenue generation. This blurs the line between the state-supported mission of the University and self-supporting professional masters programs that may bring in additional (non-state) revenue. Possible negative impacts may arise in the quality of instruction in state-supported programs, less accessibility to economically rewarding graduate education for state residents (due to the higher tuition of SSPs), and further reduction in state support if the public perceives it is receiving less value for its investment in the University. Graduate Council

- recognized the policy must be written to provide flexibility in establishing SSPs, and pointed out its concerns with the potential breadth of programs to which it might be applied and the possible negative consequences.
- 2. As referenced above, a major concern is accessibility of programs for state residents. It is gratifying to see that the new policy states that proposing programs must have an accessibility goal, although there is understandably flexibility for programs in defining this goal. The extent to which programs can support accessibility depends on many factors that vary by program. Still, concern remains about how accessibility will be ensured, given the flexibility of the policy.
- 3. Instead of further proscribing the types of masters programs that fall under the policy or accessibility goals, it might be more useful to establish tracking mechanisms to demonstrate that self-supporting programs are not having a deleterious effect on the state-supported mission of the university, especially as they grow in number and become more publically visible. This might include tracking enrollment, review outcomes, diversity (economic, etc.), and such in self-supporting and related state-supported programs. It could also include tracking of self-supporting programs over time to ensure that they are occupying the desired niche well: a) serving a non-traditional population, such as full-time employees, mid-career professionals, international students, and/or students supported by their employers; b) offered through an alternative mode of delivery, such as online instruction or a hybrid model; c) alternatively schedule, such as during evenings, weekends, and summers; and/or d) offered in an alternative location. One presumes these features are desired in order to minimize the impact on the state-supported programs and mission of the University. Tracking mechanisms should also be accompanied by periodic review and corrective actions, as necessary.
- 4. The increased flexibility of the policy should be accompanied by measures (tracking for example) to demonstrate to ourselves and others that the role of a public university is not being compromised through the creation and proliferation of self-supporting professional masters programs.
- 5. Additional concerns include ensuring UC quality for self-supporting programs, given the flexibility in the policy for including non-ladder rank faculty in instruction, and impact on ladder-rank faculty workload and its resulting effect on state-supported programs and faculty research output. Although it is good to see the issue of conversion of state-supported programs to self-supporting programs now addressed, this could be done more clearly to preserve the integrity of the state-supported mission of the University.

The Committee on Research (COR) acknowledged self-supporting programs are dependent on tuition to sustain themselves, as such, COR is concerned for SSPs potential to impact the research and teaching enterprise mission of the University. Creating the risk that faculty may be recruited and evaluated not on the basis of their contributions to research and core teaching, but for the ability to recruit students to self-supporting programs in order to generate more tuition. The risk of such programs to distort and

jeopardize the core functions of the university are particularly acute at UC Merced, which is still at an early phase of growth.

COR is also wary of situations in which a state-funded program is closely conjoined with a related private, self-supporting program. This could create a cross-cannibalization effect whereby one program overpowers the other. Pedagogical problems and student inequity are also likely outcomes if students in state-funded programs and self-funded programs attend the same classes and become closely related cohorts.

Additionally, COR offers the following suggestions:

- 1. Tie self-supporting programs to a significant regulatory structure subject to Senate oversight.
- 2. Section III G of the policy document states: "SSGPDPs shall not in any way diminish a school's or department's responsibilities to the full complement of state supported programs." The document does not, however, provide mechanisms to ensure that this dictate is enforced.
- 3. Section V. C. 2 states: "If the faculty member's participation is in addition to his or her responsibilities as a full-time UC employee, then he or she should receive additional compensation which must be calculated and recorded in accordance with relevant Academic Personnel Manual policies and reporting requirements." The document is not clear on when a faculty member's participation should be considered part of his or her regular responsibilities and when it is "in addition". If the criteria for "in addition" is too easily met, this may draw faculty labor away from their standard obligations in favor of increased wages.

The Committee on Rules and Elections (CRE) discussed the policy and provided the following:

- 1. The document clearly wishes to make the original mission of self-supporting programs more flexible—yet the name and spirit seems still to be narrowing.
- 2. In the spirit of shared governance, if the self-supporting programs are intended to open up new opportunities for creating degree programs that can stand alone in terms of resources, then it seems that flexibility may come in the form of programs that may be hard to establish as "professional", yet may still satisfy needs and be in demand (e.g., 5th year master's programs in topics that may not have an existing professional society that supplies accreditation, but yet serve a specific potential educational function that is in demand). Some example programs that exist already start looking like this (at UCOP website, and in some of the Senate discussions and reviews in 2011). The shared governance issue here is that the curriculum belongs to the faculty. If a faculty body can carefully justify a self-supporting program according to all the resource-based guidelines, CRE is unsure of the reason to specify "professional". The committee questions if this will put constraints on how faculty can design these courses of study in a manner that is orthogonal to the budgetary/resource concerns. If this is true, then this may put undue constraints on a faculty body's development of advanced curriculum using

- new approaches for delivery (e.g., hybrid) or new topics (e.g., data science, digital humanities, etc.) that go against the spirit of faculty control over these academic domains.
- 3. The committee questioned if a professional program blurs the distinction between the standard roles of shared governance. The Merced Division Council and other committees have discussed that professional master's degrees can decouple academic programs from state support and, by implications, from coordination with administration. If this is the case what are the implications for long-standing structures inherent in the relationship between administration and faculty at the UC? Expanding these programs may have broad structural implications.

We appreciate the opportunity to provide comments.

Sincerely,

Ignacio López-Calvo, Chair

Jameis Copus Colu

Division Council

CC: Division Council Senate Office

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ACADEMIC SENATE, MERCED DIVISION GRADUATE COUNCIL (GC) VALERIE LEPPERT, CHAIR UNIVERSITY OF CALIFORNIA, MERCED 5200 NORTH LAKE ROAD MERCED, CA 95343 (209) 228-6312

January 14, 2014

To: Ignacio López-Calvo, Senate Chair

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

Re: GC comments on the Systemwide Self-Supporting Graduate Professional Degree

Programs (SSGPDP) Policy

In response to DivCo's request, the Graduate Council reviewed the proposed revised policy for Self-Supporting Programs that now includes implementation information. The council's concerns and comments are summarized below.

The revisions define the policy being for professional master's degree programs only, although professional programs are broadly defined, and explicitly acknowledge that such programs provide an additional revenue source in a climate of declining state funding. The 2011 policy has been changed from requiring programs to be delivered by non-traditional means (distance) and/or serving non-traditional populations such as full-time employees, midcareer professionals, and international students, to stating that these are typical features of self-supporting programs. SSPs are now allowed to serve students that have been traditionally served by the University's state-supported programs.

A positive interpretation of these changes is that barriers have been removed for forming self-supporting programs, allowing the University to serve more students and expand revenue generation.

However, major concerns about the new policy include:

1. Ambiguity about what may be considered a "professional masters program". The Council notes that as the number of SSPs has grown system wide, numerous new programs that fall outside the normal definition of a professional program have proliferated. The concern is that the most marketable aspects of state-supported programs might be packaged into SSPs for additional revenue generation. This blurs the line between the state-supported mission of the university and self-supporting professional masters programs that may bring in additional (non-state) revenue. Possible negative impacts may arise in the quality of instruction in state-supported programs, less accessibility to economically rewarding graduate education for state residents (due to the higher tuition of SSPs), and further reduction in state support as a result if the public perceives it is receiving less value for its investment in the University. The Council recognizes that the policy must be written to provide flexibility in establishing SSPs, but never the less wishes to point out its concern with the potential breadth of programs to which it might be applied and the possible

negative consequences.

- 2. As referenced above, a major concern is accessibility of programs for state residents. It is gratifying to see that the new policy states that proposing programs must have an accessibility goal, although there is understandably flexibility for programs in defining this goal (the extent to which programs can support accessibility depends on many factors that vary by program). Still, concern remains about how accessibility will be ensured, given the flexibility of the policy.
- 3. Instead of further proscribing the types of masters programs that fall under the policy or accessibility goals, it might be more useful to establish tracking mechanisms to *demonstrate* that self-supporting programs are not having a deleterious effect on the state-supported mission of the university, especially as they grow in number and become more publically visible. This might include tracking enrollment, review outcomes, diversity (economic, etc.), and such in self-supporting and *related* state-supported programs. It could also include tracking of self-supporting programs over time to ensure that they truly are occupying the desired niche well a) serving a non-traditional population, such as full-time employees, mid-career professionals, international students, and/or students supported by their employers; b) offered through an alternative mode of delivery, such as online instruction or a hybrid model; c) alternatively scheduled, such as during evenings, weekends, and summers; and/or d) offered in an alternative location. (One presumes these features are desired in order to minimize the impact on the state-supported programs and mission of the University.) Tracking mechanisms should be accompanied by periodic review and corrective actions, as necessary.

Additional concerns include ensuring UC quality for self-supporting programs (given the flexibility in the policy for including non-ladder rank faculty in instruction), and impact on ladder-rank faculty workload (and its resulting effect on state-supported programs and faculty research output). Although it is good to see the issue of conversion of state-supported programs to self-supporting programs now addressed, this could be done more clearly to preserve the integrity of the state-supported mission of the university.

In summary, the increased flexibility of the policy should be accompanied by measures (tracking, for example) to demonstrate to ourselves and others that the role of a public university is not being compromised through the creation and proliferation of self-supporting professional masters programs.

Cc: Graduate Council
Division Council
Senate Office

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ACADEMIC SENATE, MERCED DIVISION COMMITTEE ON RESEARCH RUTH MOSTERN, CHAIR rmostern@ucmerced.edu UNIVERSITY OF CALIFORNIA, MERCED 5200 NORTH LAKE ROAD MERCED, CA 95344 (209) 228-4369; fax (209) 228-7955

January 13, 2014

To: Ignacio López-Calvo, Chair, Division Council

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

Re: Systemwide Request to Review Self-Supporting Graduate Professional Degree Programs Policy

At Division Council's request on November 20, COR reviewed the proposed revisions to Self-Supporting Graduate Professional Degree Programs Policy (SSGPDPP). COR conveys the following comments:

Self-supporting programs are dependent on tuition to sustain themselves. As such, COR is concerned for their potential to impact research and teaching enterprise mission of the University, for instance creating the risk that faculty may be recruited and evaluated not on the basis of their contributions to research and core teaching, but for their ability to recruit students to self-supporting programs in order to generate more tuition. The risk of such programs to distort and jeopardize the core functions of the university are particularly acute at UC Merced, which is still at an early phase of growth.

COR is also wary of situations in which a state-funded program is closely conjoined with a related private, self-supporting program. This could create a cross-cannibalization effect whereby one program overpowers the other. The pedagogical problems and student inequity are also likely outcomes if students in state-funded programs and self-funded programs attend the same classes and become closely related cohorts.

COR advises that self-supporting programs be tied to a significant regulatory structure and be subject to Senate oversight.

Section III G of the policy document states: "SSGPDPs shall not in any way diminish a school's or department's responsibilities to the full complement of state-supported programs."

The document does not, however, provide mechanisms to ensure that this dictate is enforced.

Section V C 2 states: "If the faculty member's participation is in addition to his or her responsibilities as a full-time UC employee, then he or she should receive additional compensation which must be calculated and recorded in accordance with relevant Academic Personnel Manual policies and reporting requirements."

The document is not clear on when a faculty member's participation should be considered part of his or her regular responsibilities and when it is "in addition". If the criteria for "in addition" work is too easily met, this may draw faculty labor away from their standard obligations in favor of increased wages.

cc: COR Members
DivCo Members
Senate Office

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ACADEMIC SENATE, MERCED DIVISION COMMITTEE ON RULES & ELECTIONS (CRE) Rick Dale, CHAIR UNIVERSITY OF CALIFORNIA, 5200 NORTH LAKE ROAD MERCED, CA 95343 (209) 228-6312

Date: January 23, 2014

To: Ignacio López-Calvo, Chair, Academic Senate; Divisional Council

From: Rick Dale, Chair, Committee on Rules & Elections (CRE)

Re: Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy Review

The Committee on Rules of Elections (CRE) discussed Self-Supporting Graduate Professional Degree Programs (SSGPDP) and while it is not in the wheelhouse of CRE members shared some thoughts regarding SSGPDP issues. The history and current specification of these programs, found in the packet, were quite helpful, but it must be noted that this is a new and relatively unfamiliar issue to both CRE and UC Merced's faculty. The committee nevertheless shares these general thoughts, in case they are useful:

- 1. The document clearly wishes to make the original mission of self-supporting programs more flexible—yet the name and spirit seems still to be narrowing.
- 2. In the spirit of shared governance, if the self-supporting programs are intended to open up new opportunities for creating degree programs that can stand alone in terms of resources, then it seems that flexibility may come in the form of programs that may be hard to establish as "professional", yet may still satisfy needs and be in demand (e.g., 5th -year master's programs in topics that may not have an existing professional society that supplies accreditation, but yet serve a specific potential educational function that is in demand). Some example programs that exist already start looking like this (at UCOP site, and in some Senate discussions and reviews in 2011). The shared governance issue here is that the curriculum belongs to the faculty. If a faculty body can carefully justify a self-supporting program according to all the resource-based guidelines, CRE is unsure of the reason to specify "professional". The committee questions if this will put constraints on how faculty can design these courses of study in a manner that is orthogonal to the budgetary/resource concerns. If this is true, then this may put undue constraints on a faculty body's development of advanced curriculum using new approaches for delivery (e.g., hybrid) or new topics (e.g., data science, digital humanities, etc.) that go against the spirit of faculty control over these academic domains.
- 3. From a quite different angle, does a professional program blur the distinction between the standard roles of shared governance? On DivCo and in other committees there has been some discussion that professional master's degrees can decouple academic programs from state support and, by implications, from coordination with administration, what are the implications here for the long-standing structures inherent in the relationship between administration and faculty at the UC? Expanding these programs may have such broad structural implications.

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

UNIVERSITY OF CALIFORNIA, MERCED 5200 NORTH LAKE ROAD MERCED, CA 95344 (209) 228-4369; fax (209) 228-7955

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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 Self-Supporting Graduate Professional Degree Programs

CAPRA appreciates the opportunity to opine on the proposed revisions to policies on Self-Supporting Graduate Professional Degree Programs but declines to comment.

cc: CAPRA Members
DivCo Members
Senate Office

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ACADEMIC SENATE, MERCED DIVISION COMMITTEE ON ACADEMIC PERSONNEL RAYMOND GIBBS, CHAIR gibbs@ucsc.edu UNIVERSITY OF CALIFORNIA, MERCED 5200 NORTH LAKE ROAD MERCED, CA 95344 (209) 228-4369; fax (209) 228-7955

November 20, 2013

To: Ignacio López-Calvo, Chair, Division Council

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

Re: Request to Review the Self-Supporting Graduate Professional Degree Programs (SSGPDP)

The Committee on Academic Personnel appreciates the opportunity to review the proposed revisions to policies on Self-Supporting Graduate Degree Programs (SSGPDP) but has no comments.

cc: CAP Members
DivCo members
Senate Office

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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

January 21, 2014

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

Dear Bill:

RE: Systemwide Review of Proposed Revised Policy for Self-Supporting Graduate Professional Degree Programs

The UCR Executive Council reviewed the proposed policy for self-supporting graduate professional degree programs (hereafter referred to as SSP for brevity). The general consensus was that the proposal presents an important improvement on the existing policy. There were, nonetheless, a few concerns.

A central issue raised by the reviewers and supported by Executive Council was the need for the policy to include the criteria for determining whether a program can be considered for self-supporting status. Without this addition there is no guarantee that the policy will be consistently applied.

In addition a series of points were made that we believe should be addressed before the policy is implemented.

- 1. The policy should specify whether students in a SSP will be allowed to take courses in other programs, and also specific guidelines for those cases where such courses are needed or desirable.
- 2. The policy should specify the procedures for an SSP to return to state funding, including the Senate and administrative review processes to be followed.
- 3. The policy should specify the whether existing SSPs will be grandfathered-in, and, if they will, the process they will need to follow to become compliant with the new policy.
- 4. The policy should specify the governance structure for SSPs.
- 5. The policy should specify the procedures for dissolving SSPs.
- 6. The policy should specify the mechanisms that should be implemented to ensure accessibility and avoid economic discrimination.
- 7. Finally, the policy should specify the funding mechanisms for SSPs during their initial 'grace' period, and, in particular, whether state funds can be used.

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



December 23, 2013

To: Jose Wudka, Chair

Riverside Division

From: Lynda Bell, Chair

Graduate Council

RE: Proposed Revised Self-Supporting Graduate Professional Degree Programs

Lynda S. Bell

Policy

Graduate Council discussed the Proposed Revised Self-Supporting Graduate Professional Degree Programs Policy at their December 12th meeting.

Graduate Council agreed that current academic programs should not be allowed to convert to a self-supporting program (SSP); instead SSPs should be reserved for new graduate programs only.

Graduate Council also suggests that a joint Senate/Administrative committee be instituted to oversee the coordination of new SSPs. This committee should consist of a member(s) from the college Dean's office staff – CFAO; representation from the Graduate Division Dean's office; as well as representation from the following Academic Senate committees: members of the College Executive Committee and the Graduate Council, as well as the Chair of Planning and Budget.



January 9, 2014

To: Jose Wudka

Chair, Riverside Division Academic Senate

Fr: Kenneth Barish

Chair, Committee on Planning and Budget

Re: Proposed Revised Proposal for Self-Supporting Graduate Professional

Degree Programs

The Committee of Planning and Budget has reviewed UCOP's proposed revisions to the 2011 policy for Self-Supporting Graduate Professional Degree Programs (SSPs). We support the efforts to revise and clarify the policy and believe it is timely. However, we have some concerns and are not able to support the revisions at this time.

The impetus for the revisions are the recognition that more programs are considering the self-supporting model as a way to support a greater number of state-supported students in lean budget times and concerns that profit was placed ahead of students and quality (e.g., in UCLA's recent effort to convert its self-supported MBA program). The revised policy continues to make clear that SSPs help UC serve additional students then would otherwise be supported and that such programs are limited to graduate professional degree programs that cater to non-traditional populations, e.g. working adults (and usually via non-traditional delivery). The main new addition is a protocol for the initiation and approval of existing self-supporting programs that wish to convert to self-supporting status. It emphasizes that conversions should be rare and includes additional language about using only allowed funds to support SSPs after a three-year initiation period. It also enhances the language requiring SSPs to be treated identically to state-supported programs in terms of faculty approval and oversight. Details about the annual reporting requirement including financially accessibility are also added. We find the clarifications, additions, and new details to be an improvement.

While we appreciate the improvements, we have one major concern on the policy as well as local concerns. The major concern is the lack of a clear basis for identifying a proposal as a SSP distinct from other graduate degree programs. The current policy lists a set of criteria. The proposed revised policy, on the other hand, states "many" SSPs tend to have

certain characteristics. The revised policy is a step backward in this regard and provide little guidance when considering to approve a program as self-supporting. While considering SSPs as a panacea to budget ills is attractive, it raises inherent conflict-of-interest concerns in that the primary oversight is by entities that financially benefit. It is also hard to believe that SSP don't divert some resources (e.g. faculty time and talent) away from UC's primary mission and once a program is established, there are intrinsic pressures to continue (diverting other non-UC resources). For all of these reasons, a clear definition of SSPs which are used in the approval process is essential. The revised should take a step forward in this definition rather than backward. Many of the other concerns may need to be addressed by a campus specific approval and review policies.

Given that is a longstanding concern in the senate (particularly on campuses that have a number of these programs) that these programs are purely "cash cows", that they inherently take away from our resources from state supported programs, and that there are inherent conflict-of-interests in the proposal and a review process. Therefore, it may useful to summarize how the finances of SSPs differ from Professional Degree Programs (PDPs), as understood from Matt Hull: (1) SSPs. All the fees to go to the department or program and the program repays campus entities (however, the methodology for this has not been yet developed at UCR as none of our SSPs are fully self-supporting). There is no financial aid set-asides, although a financial aid program is allowable and SSPs must have an articulated financial accessibility goal for their students and a student financial support plan for achieving their goal. (2) PDPs. One-third of tuition is mandated to go back to financial aid (but is allocated to the grad division and does not necessarily go back to the program). At at least one-third of the Professional Fee Supplemental Tuition must be spent by the program for Grad Student support, the remainder goes to the program (at lease at UCR).

We recommend some local actions on our campus. While SSPs have successful been implemented by other UC schools and are proliferating, we only have a few SSPs at UCR and none are truly self-supporting. Since the number of SSPs are likely to increase at UCR and the UCOP policy may not provide sufficient guidance, the Senate should proactively carefully consider the role they should play on our campus. The Senate should also consider issues in regards to the resources needed to review these programs. We additionally recommend that a Senate-administrative task force be set-up to develop a campus implementation policy to complement the UCOP policy. The task force should, at a minimum, consist of the Graduate Dean, AVC or VC for Planning and Budget, and representation from the Senate committees on Graduate Education and Planning and Budget. An attempt to start this was made a couple years ago, but it did not get off the ground. We feel it should now be formalized and given priority.



Office of the Dean Riverside, CA 92521 Tel 951.827.5190 Fax 951.827.3188 www.engr.ucr.edu

January 9, 2014

TO: Jose Wudka, Chair Riverside Division

FR: Akula Venkatram, Chair

Executive Committee, Bourns College of Engineering

RE: Review of Revised Self Supporting Graduate Professional Degree Program Policy

The BCOE Executive Committee has reviewed the *Revised Self Supporting Graduate Professional Degree Program Policy* and finds that the proposed revisions to the 2011 UCOP Policy include guidelines and details that are helpful in developing programs. However, the new policy raises the following questions and concerns:

- 1. UC already has developed 60 self-supporting graduate degree programs generating more than \$130 million dollars annually. Clearly, these programs are in demand and thriving as a collective. What is the reason for revising a policy that is only two years old?
- 2. What are the substantive changes in this draft policy versus the existing policy? A comparative chart would enlighten reviewers.
- 3. What are the specific shortcomings/concerns of the previous policy and how does this draft policy seek to address them?
- 4. One of the added components being proposed is the requirement for a "financial accessibility goal". While it is stated that there is an expectation to address access for students across a wide range of incomes, it does not provide any specifics.
- 5. The requirements for financial accessibility could become a significant roadblock to the initiation of a new program if some committee or administrative body imposes onerous requirements for acceptability. Is there an expected measurable goal and timeframe? Who will approve this goal or deem it acceptable?

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

RIVERSIDE, CALIFORNIA 92521-0132

January 8, 2014

TO: José Wudka, Chair

Academic Senate

FROM: Leonora Saavedra, Vice Chair

CHASS Executive Committee

RE: Proposed Revised Self-Supporting Graduate Professional Degree Programs

The CHASS Executive Committee discussed the proposed revisions to the self-supporting graduate professional degree programs at the regular meeting on January 8, 2014. The committee would like more information about the rationale and motivation behind these revisions.

The committee would like clarification of the following sentence as well: "self-supporting Ph.D. programs, graduate master's degree programs primarily leading to a Ph.D., and all undergraduate degree programs would not be eligible for self-supporting status."

Leonora Saavedra, Vice Chair

UCR CHASS Executive Committee



TO: Jose Wudka, Chair,

Riverside Division

FROM: Gillian Wilson, Chair, Executive Committee

College of Natural and Agricultural Sciences

DATE: Jan 8th 2014

RE: Proposed Revised Self-Supporting Graduate Professional Degree Programs

Dear Jose,

The CNAS Executive Committee discussed the proposed revised Self-Supporting Graduate Professional Degree Programs (SSGPDP) at its meeting on January 7th 2014. While the committee accepts that there is a place for SSGPDPs, it did not feel that the proposal under review contained sufficient details to enable a comprehensive assessment. In particular, the committee did not feel that sufficient guarantees were in place to ensure that the high standards of UC instruction offered under state-supported programs would be maintained under self-supporting programs.

Some questions raised during the course of the committee's discussion were:

- 1) What are the academic differences between self- and state-funded programs?
- 2) Will the self-supporting programs be accredited university programs?

3) How does a student move from a self- to a state-funded program?

Yours sincerely.

Gillian Wilson

Chair, Executive Committee

College of Natural and Agricultural Sciences



January 9, 2014

To: Jose Wudka, Chair

Riverside Division

From: Barry Mishra, Faculty Chair

School of Business Administrations

RE: Proposed Revised Self-Supporting Graduate Professional Degree Programs

The SOBA EC reviewed the proposed policy changes and think they seem fine. However, given that the focus of the revisions seem to be on clarifying the degrees eligible to become self-supporting programs and the establishment/conversion process for self-supporting programs, we do not know to what extent the policy should also clarify what happens when a program fails. One of our self-supporting program at Palm desert campus did fail. But should a program fail, the revised policy seemed less clear as to the process for dissolution. It might help to have this information as well. Besides that the EC had no other comments.



Division of Biomedical

To: Jose Wudka, Chair of the Senate

Sciences

From: Ameae Walker, Chair SOM executive committee
Re: self-supporting graduate professional degree programs

School of Medicine

Riverside, CA 92521

Tel (951) 827-5942

At its meeting, 12/10/2013, the SOM executive committee discussed the proposed revision to policies on self-supporting graduate professional degree programs. There was unanimous support for the revision and no concerns were raised.

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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OFFICE OF THE ACADEMIC SENATE

9500 GILMAN DRIVE LA JOLLA, CALIFORNIA 92093-0002 TELEPHONE: (858) 534-364 FAX: (858) 534-4528

January 21, 2014

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

Subject: Proposed Revisions to Self-Supporting Graduate Professional Degree

Programs Policy

The proposed revisions to the Self-Supporting Graduate Degree Programs (SSGPDP) Policy were sent to the appropriate Divisional committees for review and comment and were discussed at the January 6, 2014 meeting of the Senate Council. The San Diego Division supports the revised policy with a number of comments and proposed clarifications as described below.

- 1. Section III.H.3. Conversion. Senate Council supports the statement that conversion of a state-supported program to self-supporting status should be infrequent and uncommon, but noted that the policy does not include any specific eligibility criteria that would limit conversion.
- 2. Section III.A. Introduction. Reviewers noted that the statement from the 2011 Policy that self-supporting programs "have the potential to generate resources that would enhance the quality, access, and affordability of core academic programs and departments" was omitted from the revised policy, and recommended that the policy continue to explicitly state that revenue from SSGPDPs may be directed towards core academic programs.
- 3. Section III.B. Description of SSGPDPs. The revision eliminates the requirement that an SSGPDP must meet one of four criteria to be considered for self-supporting status. This is useful as it provides flexibility that will allow campuses to more rapidly respond to educational opportunities. However, by failing to provide such criteria the policy implies that the decision about classifying a professional degree program should classified as an SSGPDP versus a state supported program that charge professional degree supplemental tuition (PDST) can be made purely on a financial basis. Is this the intent?

- 4. Section III.F. Comparable Faculty. The statement that "ladder faculty are responsible for SSGPDPs" fails to provide a clear distinction between providing academic oversight of a program and teaching in a program. We suggest that this section be divided into two sections, one clearly stating that Senate faculty are responsible for managing the curriculum and degree requirements, and the second stating that non-Senate faculty can participate in teaching in these programs.
- 5. Section III.G. Faculty Workload. We support the statement that these programs should not compromise the commitment to offering the full complement of state-supported programs, and support the UCSD policy (December 2010) that provides guidelines for the number of courses a faculty member can teach per year.
- 6. Section III. I. Phase-in Period. The policy calls for SSGPDPs to be fully self-supporting after a phase-in period, but it does not specify what kinds of funds may be used to cover costs during this period. Reviewers suggest adding the statement that disallowed funds may not be used for the phase-in costs of an SSGPDP.
- 7. Section III.K. Review of SSGPDPs. We recommended adding a requirement that SSGPDPs are responsible for generating the funds necessary for program reviews.
- 8. Section III.O. and Section V.B.1.c. Financial Accessibility. The policy provides a clear mandate for setting and annually reporting financial accessibility goals, which we support, with two suggestions for improvement. First, given the tradeoff between financial self-sustainability and financial accessibility, it would be beneficial if the policy more clearly stated the expected and recommended level of financial accessibility for these programs, beyond the current statement that it should be accessible to a "wide range of income levels". Second, it might be difficult for programs to accurately forecast how many students will require support and at what level. Thus, within the context of a revision that provides additional clarity on the expected level of financial accessibility, we recommend that each program be given sufficient local autonomy to allow modification of their financial support plan to meet local needs without being subject to Presidential approval.
- 9. Section III.P. Consultation. The definition of program stakeholders should include not only students and faculty associated with the program, but also education experts and administrators who focus on questions of access and inclusion (financial and otherwise).
- 10. Finally, we were surprised that the policy fails to make any statements regarding expectations for diversity in self-supporting programs, although such programs contribute directly to the professional pipeline and are critical for our mission of promoting equal opportunity and improving social mobility. A failure to address this topic risks the establishment of financially viable programs that replicate or exacerbate persistent inequities in opportunities across various demographic groups and gender. We recommend that the policy provide clear expectations and that it encourage campuses to develop diversity and access plans that are tailored to meet the needs of the local community and the specific program. We further

recommend that the policy encourage creative partnerships between selfsupporting programs and units on campus with a sustained commitment to and demonstrated record in promoting equal access and opportunity.

Thank you for the opportunity to comment on this policy.

Kit Pogliano

Chair

Academic Senate, San Diego Division

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



Academic Senate senate.ucsf.edu

Office of the Academic Senate

500 Parnassus Ave, MUE 230 San Francisco, CA 94143-0764 Campus Box 0764 tel: 415/514-2696 academic.senate@ucsf.edu https://senate.ucsf.edu

Farid Chehab, PhD, Chair Ruth Greenblatt, MD, Vice Chair Paul Green, PhD, Secretary Anne Slavotinek, MD, Parliamentarian January 23, 2014

William Jacob, PhD Academic Council Chair University of California 1111 Franklin Street Oakland, CA 94607-5200 william.jacob@ucop.edu

Re: Proposed University of California Policy on Self-Supporting Graduate Professional Degree Programs (SSGPDP)

Dear Chair Jacob:

The UCSF Graduate Council and School of Nursing Faculty Council have reviewed the proposed University of California policy on Self-Supporting Graduate Professional Degree Programs (SSGPDP) transmitted for review by your office on November 15, 2013.

Overall, the Graduate Council noted that the proposed policy could impact faculty interest and participation in self-supporting programs at our campus. In addition, the council proposes this not to be a "policy", and would rather consider it as a "guideline".

Graduate Council members also expressed concern that, if the self-supporting program cannot sustain itself financially, the host department would become financially responsible. To address this concern, we recommend clarification as to repercussions in that event.

School of Nursing Faculty Council members provided the following comments:

- Shared Governance: Nursing Faculty Council members find that the policy does not provide enough details on the Senate's oversight and decision-making associated with the self-supporting degree programs. In the School of Nursing, the oversight of a self-supporting degree is done by the Dean's Office and not by the Academic Senate. Council members believe the policy should contain more details on the Senate's authority of not only the approval process, but also the ongoing evaluation of the self-supporting degree programs.
- Time Limit to Become Self-Supporting: Nursing Faculty Council members ask whether three years is enough time for a program to become completely self-supporting?

• Funding for Clinical Faculty: State-supported programs have always had challenges with providing support for the clinical faculty essential to many of the programs. With new self-supporting degree programs, there might be a possibility for resources that can support clinical faculty. Council members would like to know if the language can accommodate for clinical faculty?

In the language of this draft policy, there are a few sections that require additional attention.

- On page 2, Section II, the definition on what constitutes a Professional Degree is missing. Not all self-supported programs are currently or will be aimed towards traditional professional careers (e.g., medicine, dentistry, pharmacy, veterinary, law, engineering, etc.), but may be targeted at enhancing knowledge in a specific field such as computational biology bioinformatics, imaging, policy, etc.
- On page 3, section B, since self-supporting programs can be also targeted non-professionals, we suggest to change the statement to include "...that correspond to anticipated professional and academic careers"
- On page 4, at the end of the second paragraph of Section B states "All faculty (ladder and non-ladder) in both state-supported programs and SSGPDPs operate under UC academic personnel policies and practices", but states later in Section F that only ladder faculty are responsible for SSGPDPs. This inequality is poorly justified and is significant for campuses such as UCSF that has the majority of its faculty in non-ladder rank series. At UCSF, only 15.6% (375 out of approximately 2,400 faculty members) of faculty hold Ladder Rank faculty titles. UCSF faculty members in the In Residence, Clinical X, Adjunct and Health Sciences Clinical series are actively engaged in educational activities across our programs. In the spirit of this policy, we suggest removing the word "ladder", leaving the word "faculty" as written in this section and for all other instances of the word in the document.
- On page 5, Subsection 3, define how state funds should be handled following the conversion of a state-supported program to a self-supporting program.
- On page 7, Section N, specify whether programs could charge fees for state-supported students
 wishing to enroll for credit in a course offered by a self-supporting program. Conversely, could a
 student in a self-supported program enroll for credit in a state-supported program? One
 recommendation is to allow campus flexibility on this issue.
- On page 7, Section O, a clear statement requiring the self-supported program to commit a minimum percent of its budget towards financial aid would benefit the financial accessibility goal.

We appreciate the opportunity to provide feedback regarding the proposed policy and look forward to learning more as the review process continues. Should you have questions, please do not hesitate to contact me at chehabf@labmed2.ucsf.edu.

Sincerely,

Farid Chehab, PhD, 2013-15 Chair UCSF Academic Senate

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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

January 24, 2014

Bill Jacob, Chair Academic Senate

RE: Self-Supporting Graduate Professional Degree Program Policy

Dear Bill,

The following groups in the USCB Division were asked to review the proposed revisions to the policy on Self-Supporting Graduate Professional Degree Programs, including: Graduate Council, Council on Planning and Budget, Council on Research and Instructional Resources, Council on Faculty Issues and Awards, Undergraduate Council, Committee on Diversity and Equity, and the Faculty Executive Committees from Engineering and Letters and Science.

CPB raised serious concerns about the criteria for setting up a graduate professional degree, and asks "What constitutes "self-supporting?" Their concern about the fee levels was stated in terms of wondering what would be included in the budget calculations on level of fees. They ask if fees would be set merely according to market criteria? They continue by asking what costs would be included in the determination of fee levels: facilities, overhead, administrative charges, faculty and staff salaries, benefits costs, pensions and retirement? CPB also requested further clarity on how such programs would be evaluated: on academic quality or on financial viability and pointedly ask "is the focus for these programs academic quality or financial viability?" CPB was also extremely concerned that the lack of budgetary guidelines and academic criteria in the proposed draft policy may mean that one campus could develop a state supported academic program whilst another could create an SSGPDP, leading to possible significant inconsistencies among similar programs on different campuses. For all of these reasons, CPB did not support the policy in its current form.

Graduate Council was also concerned at the possibility of the conversion of state-supported graduate professional degree programs to SSGPDPs. GC also stated, however, that they simultaneously recognize that SSGPDPs could help in the creation of targeted revenue-producing programs. UCSB is one of the few campuses without any self-supporting programs, and, for that reason, GC remains, "to some degree, agnostic on this policy. GC concludes with a very strong statement that reaffirms the role of the UC and insist that the UC "maintain the centrality of its mission as a public research university". As such, issues of accessibility and diversity -- key to the DNA of a public university -- as well as academic quality, need to remain high on the agenda of the UC, "so that the standards of these programs are consistent with the high standards of all graduate programs."

The Council on Research and Instructional Resources (CRIR) also had serious concerns about the proposed policy. They are concerned that the relationship between "corporate" self-supporting programs and campus resources is murky and question whether the resource needs of students in the self-supporting programs are truly captured. They also wondered how a campus would track costs and

funding streams. CRIR is aware that SSGPDs often hire non-Senate faculty to teach. However, non-Senate faculty may not chair masters degree committees, thus creating a negative impact on the workload of ladder rank faculty. Along with a number of the other reviewing groups CRIR also asks whether students in the SSGPD programs can take classes that are not part of the SSGPD program. and vice versa: can students who are not enrolled in a SSGPD program take classes in the self-supported programs? CRIR is also concerned about the impact of self-supporting programs on campus resources, particularly on libraries. The Council suggests that the language regarding the campus payout in the event of program failure seems ill advised and suggest that an escrow account be established in the early planning stages that would cover costs once a program was deemed unsuccessful. Finally, CRIR asks if the impact on licensing contracts has been fully explored. They state that, "various licenses that the campus negotiates as a whole and buys for instruction (such as software licenses) may not be available for use by the students of self-supporting programs. This may require renegotiating UC licensed software and contracts, or some mechanism for keeping the use separate." Thus, while CRIR does see a need for such programs, they feel that issues critical to the work of a public university have not been adequately addressed by this policy.

The Council on Faculty Issues & Awards echoes many of the concerns of CPB, especially in regard to systemwide inequities if different campuses charge different fees for like programs. In addition, although CFIA does not object to the proposed policy, they express "apprehension about further privatization of the University, which may result in declining academic standards and increasing costs to students."

The Undergraduate Council expressed concern that these types of programs drain resources from existing programs since it is treated as overload work. Council recommends that all campuses need to be mindful of maintaining core resources, particularly at the undergraduate level.

The Committee on Diversity and Equity (CDE) recommends that the policy include details on how student diversity would be ensured for these programs. In addition, CDE suggests that there be a time limit for how long an SSP would operate before it was deemed to be not self-supporting, and which campus funds would be sued to support it before it was suspended. CDE also stated the policy should specify what campus funds could be used in the event a SSP is failing or has failed".

The College of Engineering Faculty Executive committee was broadly in support of the revised policy. They did, however, raise two questions. First, they asked if a student not enrolled in the SSGDP Program could take a course in the program. Secondly, they asked for clarity on how tuition and fees from the SSGDP Program could be used.

The Letters and Science Faculty Executive Committee had an extensive discussion about the revised policy and endorsed it.

Given the many concerns that reviewing groups have raised, the UCSB Division is not able to endorse the revised policy as presented. Thank you for the opportunity to comment.

Sincerely,

Kum-Kum Bhavnani, Chair Santa Barbara Division

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1156 HIGH STREET SANTA CRUZ, CALIFORNIA 95064

Office of the Academic Senate SANTA CRUZ DIVISION 125 CLARK KERR HALL (831) 459 - 2086

January 22, 2014

William Jacob, Chair Academic Council

Re: Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy

Dear Bill,

The Santa Cruz Division has reviewed the Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy. Our Graduate Council (GC) and Committee on Affirmative Action and Diversity (CAAD) voiced concern about certain aspects of the policy, and I am enclosing their responses for Academic Council's information.

Both committees were concerned about the policy's language concerning financial accessibility. There is a seeming contradiction between having a program financially supported completely by students and having a program that is accessible to a diverse group of students. The SSGPDP Policy is not specific about the expectation for financial accessibility, and concrete goals such as the explicit return-to-aid formula for the non-profit sector of the university ought to be put forth.

Sincerely,

Joe Konopelski, Chair Academic Senate Santa Cruz Division

Kongrebbi

Enclosure

cc: Kimberly Lau, Chair, Committee on Affirmative Action and Diversity Jose Renau, Chair, Committee on Computing and Telecommunications Daniel Friedman, Chair, Committee on Planning and Budget Bruce Schumm, Chair, Graduate Council Charlie McDowell, Chair, Committee on Teaching

January 21, 2014

Joe Konopelski Chair, Academic Senate

Re: Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy

Dear Joe,

The Committee on Affirmative Action and Diversity (CAAD) reviewed the proposed revised Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy. The policy proposes somewhat of a contradiction, as it notes that all program costs will be borne by SSGPDP students or the sponsoring unit (section B, pages 3-4) yet requires that all SSGPDPs have a financial accessibility goal for their student population and a student financial support plan for achieving this goal (section O, page 7). These goals—having student fees pay for the majority (or entirety) of the program and having the program accessible to all students—may be mutually exclusive. The committee would like to know more about how these two goals will work together. CAAD noted in its recent review that the new PDST policy is more attentive to addressing the issue of accessibility, even proposing loan forgiveness, and we would hope to see a similar level of specificity for the SSGPDP policy.

Currently, there is no threshold for the financial accessibility goals. We realize that these programs likely cannot achieve the same ratio of paying to non-paying students as the non-profit sector of the university, but without a high bar, accessibility is not guaranteed. CAAD would like to see an example of a program fee structure and return to aid, and whether this would allow a program to remain accessible to a wide range of students.

Additionally, the committee discussed the number of professional degree seeking students that seek to work with underserved populations. CAAD hopes that this factors into the development of the program accessibility plans. In particular, regarding future earnings calculations, we hope that programs will take into consideration the commitment that many students have to serving underprivileged populations, where their income will be substantially lower than if they enter the private sector.

Sincerely,

Kimberly Lau, Chair

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Committee on Affirmative Action and

Diversity

cc: GC Chair Schumm
COT Chair McDowell

January 17, 2014

Joe Konopelski, Chair Academic Senate

RE: Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy

Dear Joe,

The request to review the draft self-supporting program (SSGPDP) policy came at a time, and with a due date, that allowed discussion of the policy and formulation of a response at only one meeting of the Graduate Council. Unfortunately, for that meeting a pressing issue arose at the last moment, and in the end the Council had less than 15 minutes to discuss the draft policy. On the other hand, since the policy has been in development for over a year, it has benefited from extensive Senate feedback at the system-wide level – a process that I have myself participated in through my membership on the Coordinating Committee on Graduate Affairs. As a result, the discussion has progressed to a rather advanced stage, and I believe that any group wishing to offer meaningful comments on the draft policy at this point in its development would need to first benefit from an in-depth discussion of the dialog that has already taken place between the Senate and the Administration as the draft policy was developed. No written documents provide this background, and it was not possible for me to provide this background in the small amount of time we had at hand in our discussion on December 5. Thus, the Council's response is limited to one or two broad generalities.

As are many of our colleagues, the Council is very concerned that the expansion of non-state-supported graduate programs, if not done in a very measured and appropriately limited way, will erode the very core of the state's public higher education program, with a corresponding threat to access to the highest levels of education for California's diverse citizenry. This consideration, we feel, should be kept front-and-center as the policy is finalized and implemented. We note that the current draft does include language about financial accessibility; however, while consideration of the issue is required of any group proposing the creation of or conversion a self-supporting program, the policy is not specific as to what will be expected of SSGPDP programs. This is in marked contrast to state-supported programs, for which return-to-aid set-asides are mandated formulaically. Accessibility to students from all walks of life is an essential tenet to be held fast in all aspects of the University's undertakings, and not the least in its offerings of advanced degree programs. It will be up to the Senate, in its review of individual SSGPDP proposals, to "hold the line" on the issue of access.

It is likely that the SSGPDP policy will be finalized soon. The Provost and Senate leadership have invested significant time in drafting the document before us now, and are unlikely to let it languish even if the full review that is underway now is vocal and substantive. Once finalized, however, the campus-specific implementation phase will begin. The Council expects to be a full

Graduate Council: SSGPDP Policy January 17, 2014

Page 2 of 2

partner in that process, and hopes that the UCSC Senate leadership will join it in ensuring that the Campus's approach to SSGPDPs is consistent with the principles of the Senate and its commitment to public higher education.

Sincerely,

Bruce Schumm, Chair Graduate Council

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CC: CAAD Chair Lau CCT Chair Renau CPB Chair Friedman

COT Chair McDowell

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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 Self Supporting Professional Degree Programs (SSGPDP)

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 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 SSGPDP documents, but it should be considered in conjunction with the parallel memorandum on the PDST documents.

In general, the revision incorporates many of the provisions suggested by or discussed by CCGA over the past two years or more.

<u>POLICY</u>, <u>Sections A-B</u>: The current members of CCGA would still prefer to see a more restrictive demarcation of SSGPDP programs as complementary to existing programs, and not duplicative of them. For instance, it could be made clear (in implementation guidelines, if not here) that a new SSGPDP should not duplicate a program offered in the same school. This concern is related to the issue of conversion, as one can imagine a scenario in which "conversion" is accomplished indirectly by establishment of a competing SSGPDP and the gradual withering of the similar state-supported program.

We note that the phrase present in the 2011 policy about "hav[ing] the potential to generate resources that would enhance the quality, access, and affordability of core academic programs and departments" has been omitted from the revised version, and we would like to know why that is the case. Was it felt to be impolitic to declare this in the policy? Up to this time, CCGA has expected proposals to explain the indirect benefits of the SSP to the other programs through enhancements of research (e.g., contributing to expensive financial databases) and teaching (e.g., assisting renewal and improvement of teaching strategies, curricular organization, and breadth of courses offered).

<u>POLICY</u>, Section F: We understand that the participation of non-Senate or non-ladder-rank faculty in SSGPDPs may vary considerably depending on the field, making it difficult to produce a simple statement of policy. But this paragraph seems to us too brief and vague. First, there is the possible conflation of faculty "responsibility" for the program with the staffing of the courses. "Responsibility" involves, we take it, faculty leadership in designing and proposing and supervising the program. Separate from that, there has also been an expectation that in the staffing of the courses, in order to attain comparable UC quality, the proportion of regular faculty to other titles should be approximately the same as in the other degree programs of the proposing unit. Second, we had some discussion of the term "ladder faculty" and some wondered whether the term "Academic Senate faculty" would not be better here. But even with the latter term, it was pointed out that the situation at UCSF is extremely complex. It seems to us that this section needs to be expanded to explain the general expectation and then enumerate some of the outlying cases (more practice-oriented instructors in some fields; difficulty of applying same distinctions of status at medical schools).

<u>POLICY</u>, <u>Section G</u>: We agree with all the provisions stated; but we would prefer that there also be a statement that the default expectation is that after phase-in, in most SSGPDPs, faculty should more often teach by buy-out rather than by overload (for the sake of protecting faculty research effort), and proposers should be expected to explain clearly if the design of their program does not allow this expectation to be met. If this is not part of the overall policy, we hope that campuses will enforce such a policy themselves.

<u>POLICY</u>, Section H: Members were initially puzzled by (and skeptical of) the phrase "conversion will be infrequent and uncommon," but it has been explained that this sentence is meant not as a prediction but as a quasi-prescription setting a high bar for reviewers to use in evaluating conversion proposals. We would be happier with a more direct statement, such as the following: "Converting an existing state-funded program to SSGPDP 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."

<u>POLICY</u>, <u>Section J</u>: We have concerns about the lack of parallelism of the reviews of conversions in the two possible directions. Section H.3.ii acknowledges that both campus and systemwide Academic Senate review is required when conversion is from state support to SSGPDP status (and H.3.i implies the same when it mentions "the same processes as required of newly-created graduate professional degree program"), but here in J, regarding the conversion back from SSGPDP to state support, the language specifies only the campus level for review ("shall be subject to the same campus approvals required to establish a new state-supported academic or professional programs"). If this is a deliberate exclusion of review at the systemwide level, we question its justification.

<u>POLICY</u>, <u>Section O</u>: We are pleased to see the provisions related to the financial accessibility goal, and we understand the need to be flexible about this issue because of the different possibilities of support in different programs (in some programs, a very large percentage of the students will have their costs paid by a foreign government or by an employer). Nevertheless, with the distinction between PDST programs and SSGPDPs now becoming so tenuous or even non-existent, we would like to see more parallelism between the treatment of financial accessibility in the two cases. As CCGA has suggested before, it would be possible to specify a default minimum percentage of revenue to be devoted to financial aid and allow proposers to justify why this default should be waived. Whether that suggestion is acceptable or not, we strongly recommend that the monitoring of the effects of SSGPDP financial structures on accessibility and diversity should be carried out

with as much rigor as is being proposed in the PDST revision. We would point out that about six years ago CCGA in fact recommended that certain data of this kind be reported in the same format by both PDST programs and SSPs.

We append the letter dated June 8, 2008, of past CCGA Chair Bruce Schumm to Academic Council Chair Michael Brown on this subject. The Committee believes this is still a desideratum, and the data should not only be reported, but monitored on a regular basis by OP and shared on a regular basis with CCGA in order to keep CCGA informed about the environment for these programs, so that it can make prudent judgments about new proposals. In addition, one may expect that at some point the Governor or Legislature will notice the number of programs in these two categories, and the University will be in the best position to explain the situation if it can demonstrate strong efforts to maintain accessibility and diversity.

Sincerely,

Donald Mastronarde, Ph.D.

Would & Maitmande

Chair, CCGA

Copy: Martha Winnacker, Academic Senate Executive Director

Prof. Kwai Ng, CCGA Co-Lead Reviewer

Prof. Shauna Somerville, CCGA Co-Lead Reviewer

Clare Sheridan, Principal Policy Analyst, Academic Council

Todd Giedt, Academic Senate Associate Director

Enclosure:

June 2008 CCGA Request for Data Related to Differential-fee and Self-supporting Graduate Programs

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COORDINATING COMMITTEE ON GRADUATE AFFAIRS (CCGA) Bruce Schumm, Chair schumm@scipp.ucsc.edu

The Assembly of the Academic Senate 1111 Franklin Street, 12th Floor Oakland, CA 94607-5200 Phone: (510) 587-6138 Fax: (510) 763-0309

June 8, 2008

MICHAEL T. BROWN, CHAIR ACADEMIC COUNCIL

RE: CCGA Request for Data Related to Differential-fee and Self-supporting Graduate Programs

Dear Michael:

The question of access to UC self-supporting and differential-fee programs has long been of concern to the Academic Senate, University administration and The Regents. In August 2006, in view of rapidly rising tuition and fees for self-supporting graduate programs, the Academic Council approved a request by the Coordinating Committee on Graduate Affairs (CCGA) for a report by the University administration on the relative demographic profile of students in parallel state- and self-supporting graduate programs.

This report was made available in January 2007. Additionally, in September 2007, the adoption of Regent's Item J-1 "... introduced new conditions related to financial aid, affordability, outreach, and fee levels for any program that proposed to increase its professional degree fees by more than 6 percent." A March 11, 2008 UCOP report provided a comprehensive review of UC differential-fee professional programs' compliance with the mandate of Regent's Item J-1.

CCGA reviewed both of these documents, which together provided a great deal of insight into the nature and impact of steadily-increasing professional-degree and self-supporting program fees. The August 2006 report concluded that "CCGA's expressed concern about loan burden for students in self-supporting programs may be warranted for some programs. While students in all self-supporting programs as a group are less likely to receive loan assistance than students in state-supported professional degree programs, students in the self-supporting education and nursing programs are more likely to receive loan assistance than students in state-supported programs in the same field." This in turn may be having an impact on access. In self-supporting nursing programs, for example, "Students in self-supporting programs were more likely to be white and less likely to be Asian/Pacific Islander, African American or Chicano/Latino than students in the state-supported programs..." The March 2008 report on differential-fee programs found that most programs were in compliance with the conditions set by Regent's Item J-1. It did not however provide information on enrollment demographics for those programs. The absence of such data renewed CCGA's concerns about access to self-supporting and differential-fee programs.

CCGA's reaction to the August 2006 report on self-supporting programs is summarized in a July 2007 letter from CCGA Chair Reen Wu to Academic Senate Chair John Oakley. CCGA expressed gratitude to the Office of the President for its thorough and timely analysis. Beyond this, though, CCGA felt that the studies undertaken in the report could be augmented to provide a more precise picture of the effects of steadily rising fees on differential-fee and self-supporting program access. CCGA felt it would be of great value to do a similar analysis for differential-fee programs as was done for self-supporting programs. CCGA's August 2006 letter

also requested an expansion of the analysis to include information on the applicant pool for self-supporting and differential-fee programs.

Prompted by the July 2007 letter from CCGA, the Office of the President produced a table that outlined the availability of the various elements of data requested by CCGA for differential-fee programs. The elements were divided into three categories: data available at UCOP, data available from the campuses/programs, and data that is not available either at UCOP or within campus records. In general, data on socio-economic background is not available for any class of students in these programs, and data is only available for a limited subset of applicants to the programs.

A subgroup of CCGA reviewed this table, recognizing that while a number of the important elements of the data are not available, it would likely not be an unreasonable burden to require that self-supporting and differential-fee programs collect much of the missing data, and make it available to the Office of the President on an annual basis. To this end, the CCGA subgroup consulted with the Office of the President, and developed the following set of data that it believes should be required annually of these programs:

Program Data

- Resident fees
- Non-resident fees
- Overall estimated cost of program
- Nominal, average, and normative duration, including leaves of absence [Normative = most students done, say, 85%]

Applicant Data

- Pell Grant status
- Highest level of education of parents or guardians
- Ethnicity
- Gender
- U.S. citizen/international

Enrollee Data

- Pell Grant status
- Highest level of education of parents or guardians
- Ethnicity
- Gender
- U.S. citizen/international
- Cumulative aid award
- Cumulative loan balance
- Time to successful/unsuccessful departure from program

In particular, discussions with the Office of the President suggested that undergraduate Pell Grant status could serve as an effective proxy for socio-economic background. While the subcommittee was comfortable with the inclusion of Pell Grant status, it was concerned that there may be other appropriate data elements that, along with Pell Grant status, would build an even greater correlation with socio-economic background. CCGA urges that the Office of the President, in consultation with CCGA, return to this question before finalizing the list of data elements that it will require of differential-fee and self-supporting graduate programs. For now, CCGA has added "Highest level of education of parents or guardians" as a further indication of socio-economic status.

In making this request, CCGA acknowledges that there are some general differences between self-supporting and differential-fee programs that may make certain elements of the data more relevant for one group or the other. However, CCGA found it difficult to make a clear enough distinction between the two classes of programs to justify different data-collection requirements, and thus is making a single, uniform request for both classes of programs. Also, to make comparisons with state-supported programs, it will necessary that corresponding state-supported programs accumulate this data. Finally, the applicant and enrollee data should be collected and maintained on an individual basis so that correlations may be drawn between the separate data elements.

CCGA believes that the ongoing accumulation of these elements of data will allow the University to monitor trends in the attractiveness and accessibility of self-supporting and state-supported programs for different socio-economic, gender, and racial groups, as well as to evaluate the relative impediments to successful completion of the program once students are enrolled. CCGA requests that the Office of the President, in collaboration with

the Senate, propose a methodology for assessing these trends, and apply that method to the preparation of a report in the fall semester of all of years divisible by three (2010, 2013, 2016, ...).

CCGA asks that the Academic Council endorse this request and forward it to the Office of the President.

Respectfully submitted,

Mr alm

Bruce Schumm Chair, CCGA

Copy: CCGA

Executive Director Bertero-Barceló

Enclosure (1)

From: Martha Winnacker

Sent: Tuesday, November 26, 2013 11:20 AM

To: Clare Sheridan

Subject: FW: Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy

For the record.

Martha Kendall Winnacker, J.D. Executive Director, Academic Senate (510) 987-9458

From: Gundersen, Cameron [mailto:CGundersen@mednet.ucla.edu]

Sent: Tuesday, November 26, 2013 10:36 AM

To: Martha Winnacker **Cc:** Brenda Abrams

Subject: RE: Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy

Hi Martha,

I just finished reading the policy draft, and to the extent that any academic freedom concerns might arise with respect to this action, I think that several of the provisions in section III take care of any issues that might arise. Thus, I do not see any reason for CAF to opine further on this matter.

Best regards,

Cameron Gundersen

From: Martha Winnacker [mailto:Martha.Winnacker@ucop.edu]

Sent: Tuesday, November 19, 2013 1:06 PM

To: UCACOUN-L@LISTSERV.UCOP.EDU; Bruce Robertson; Gundersen, Cameron; Jeffry Lansman; Martha Conklin; Richard Kern;

Roberto Manduchi; Ross Frank

Cc: <u>UCSUPS-L@LISTSERV.UCOP.EDU</u>; Brenda Abrams; Clare Sheridan; Eric Zarate; Kenneth Feer; Michael LaBriola; Todd Giedt

Subject: FW: Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy

Chairs of Senate Divisions and Committees:

I am transmitting for formal review proposed revisions to policies on Self Supporting Graduate Degree Programs. In order to facilitate discussion at the January 29, 2014 meeting of the Academic Council, I ask that you respond by January 22, 2014. This will enable Council to convey the Senate's comments to the Provost by her requested deadline of February 7, 2014. I realize that the intervening holiday periods make it challenging to accomplish this review in the requested time period but hope it will be possible. As always, no committee is obligated to opine if this topic is outside its purview

Sincerely, Martha

Martha Kendall Winnacker, J.D. Executive Director, Academic Senate (510) 987-9458

From: Todd Greenspan

Sent: Tuesday, November 19, 2013 11:59 AM

To: Martha Winnacker

Subject: FW: Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy

From: Mariel Christian On Behalf Of Aimee Dorr
Sent: Friday, November 15, 2013 2:29 PM
To: William Jacob; Dorothy J. Leland (chancellor@ucmerced.edu); Gene D. Block (chancellor@conet.ucla.edu); George R.
Blumenthal (chancellor@ucsc.edu); Henry T. Y. Yang (henry.yang@chancellor.ucsb.edu); KIm A. Wilcox (chancellor@ucr.edu); Linda P.B. Katehi (Katehi@ucdavis.edu); Michael V. Drake (chancellor@uci.edu); Nicholas B. Dirks (chancellor@berkeley.edu); Pradeep Khosla (chancellor@ucsd.edu); Sue Desmond-Hellman (sue.hellmann@ucsf.edu)
Cc: Mary Gilly; Patrick Lenz; Iheller@berkeley.edu; kmratliff@ucdavis.edu; m.michaels@uci.edu; solsen@conet.ucla.edu; dfeitelberg2@ucmerced.edu; matthew.hull@ucr.edu; gcmatthews@ucsd.edu; Teresa.costantinidis@ucsf.edu;
Todd.lee@bap.ucsb.edu; Delaney@ucsc.edu; Tu Tran; graddean@berkeley.edu; cgenetti@graddiv.ucsb.edu; ckello@ucmerced.edu; elizabeth.watkins@ucsf.edu; fmleslie@rgs.uci.edu; jcgibeling@ucdavis.edu; graddean@ucr.edu; kbarrett@ucsd.edu; rgarrell@gdnet.ucla.edu; tyrus@ucsc.edu; dwu@unex.berkeley.edu; dfpendleton@ucdavis.edu; gmatkin@uci.edu; wsmutz@unex.ucla.edu; lro@ucsc.edu; jmthompson@ucmerced.edu; sduffy@ucx.ucr.edu; michael.brown@els.ucsb.edu; mwalshok@ucsd.edu; Robert Powell; ramulnar@uci.edu; jiyoder@ucdavis.edu; jbminster@ucsd.edu; mjkleeman@ucdavis.edu; harry.green@ucr.edu; maslach@berkeley.edu; joek@chemistry.ucsc.edu; hexter@ucdavis.edu; joseph.childers@ucr.edu;

<u>jlawrence@ucmerced.edu; m.michaels@uci.edu; avcdue@ucsd.edu; rgarrell@grad.ucla.edu;</u> Susan Carlson; Debora Obley; <u>hironao.okahana@ucla.edu; safeena@berkeley.edu;</u> Hilary Baxter; Rebecca Landes; Martha Winnacker; Pamela D. Jennings; Todd Greenspan; Aimee Dorr; Alison Galloway (<u>gallow@ucsc.edu</u>); Dallas Rabenstein (<u>dallas.rabenstein@ucr.edu</u>); Executive Vice

(profhgillman@uci.edu); Jeffrey Bluestone PhD (jbluest@diabetes.ucsf.edu); Scott L. Waugh (swaugh@conet.ucla.edu); Tom

Chancellor; Gene Lucas (gene.lucas@evc.ucsb.edu); George Breslauer (bresl@berkeley.edu); Howard Gillman

Peterson (tpeterson4@ucmerced.edu); Wanda Ellison Crockett **Subject:** Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy

On behalf of Provost Aimée Dorr, I am transmitting the attached letter. For your convenience and reference, the text of the letter is pasted below. The signed letter is attached as a PDF file.

CHANCELLORS ACADEMIC COUNCIL CHAIR JACOB

Dear Colleagues:

Enclosed please find the proposed revised Self-Supporting Graduate Professional Degree Programs (SSGPDP) Policy that includes implementation information. This draft policy is a revision to the 2011 Policy on Self-Supporting Graduate Degree Programs and its associated implementation guidelines. The proposed policy was developed and endorsed by the 2012-13 Academic Planning Council (APC), the joint Academic Senate/Administration Committee tasked with working on policies of this nature. A roster of the 2012-13 APC members is enclosed.

This transmittal is a request to the Academic Council for formal review of the policy and its implementation by the Academic Senate and to the Chancellors for review by the campus administrations. For campus review, this request is being sent directly to Chancellors, with copies to the Executive Vice Chancellors (EVCs), per the request of the Chancellors that major communications and requests for information from UCOP are addressed to them. In addition, the proposed policy and implementation is being shared with other campus constituent groups convened by UCOP -- the Graduate Deans, the Vice Chancellors for Planning and Budget, and the Extension Deans.

The University now has approximately 60 self-supporting graduate professional degree programs, enrolling over 4,500 students and generating over \$130 million annually in revenue from student charges. By policy, this revenue supports all costs of the programs and also the costs incurred by the departments/schools and campuses on behalf of the programs.

The enclosed new proposed policy builds on the 2011 revision to the policy and explicitly recognizes that self-supporting graduate professional degree programs are a necessary educational strategy to allow the University to serve a greater number of students above and beyond that which state resources will support. The proposed policy provides that only graduate professional degrees can be self-supporting – self-supporting Ph.D. programs, graduate master's degree programs primarily leading to a Ph.D., and all undergraduate degree programs would not be eligible for self-supporting status.

Among other things, the new policy addresses the very limited circumstances under which a state-supported graduate professional degree program can convert to self-supporting status. The policy also revises the existing implementation guidelines (now included as Section V. of the enclosed draft policy) to help departments and campuses facilitate the establishment of self-supporting programs and to clarify the process for receiving Presidential approval for setting and increasing student charges for each of the approved programs.

The members of the 2012-13 Academic Planning Council and I believe this policy strikes the appropriate balance between encouraging the development of self-supporting graduate professional degree programs to serve additional students and diversify University revenues and ensuring that these programs do not detract from the core state-supported mission of the University.

Please submit your written responses on the proposed policy by February 7, 2014 via email to <u>Aimee.Dorr@ucop.edu</u> with a copy to <u>Todd.Greenspan@ucop.edu</u>. All feedback received by February 7th will be considered by the Academic Planning Council as it works to complete the policy proposal that will be sent to President Napolitano for her approval. We hope to present it to her before the end of March 2014.

I look forward to receiving your responses.

Cordially,

Aimée Dorr Provost and Executive Vice President

Enclosures

cc: Academic Council Vice Chair Gilly

Executive Vice Chancellors

Vice President Lenz

Vice Chancellors for Planning and Budget

Council of Graduate Deans

Deans of University Extension

2012-13 Academic Planning Council Members

Executive Director Winnacker

Director Jennings

Director Greenspan

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UNIVERSITY COMMITTEE ON EDUCATIONAL POLICY (UCEP) Tim Labor, Chair tim.labor@ucr.edu

Assembly of the Academic Senate 1111 Franklin Street, 12th Floor Oakland, CA 94607-5200 Phone: (510) 987-9466 Fax: (510) 763-0309

December 10, 2013

William Jacob, CHAIR ACADEMIC COUNCIL

Re: Revisions to Policies for Self-Supporting Graduate Degree Programs

Dear Bill,

UCEP notes the following:

- 1. In terms of item "D. Location of Offerings," SR 694 is undefined with regard to the relationship between online education and off-campus study.
- 2. It is not clear how infrastructural costs are dignified in terms of support.

Sincerely,

Tim Labor, Chair

UCEP

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SANTA BARBARA • SANTA CRUZ

UNIVERSITY COMMITTEE ON PLANNING AND BUDGET (UCPB) Donald F. Senear, Chair dfsenear@uci.edu

Assembly of the Academic Senate 1111 Franklin Street, 12th Floor Oakland, CA 94607-5200 Phone: (510) 987-9466 Fax: (510) 763-0309

January 14, 2014

WILLIAM JACOB, CHAIR ACADEMIC COUNCIL

Re: Proposed changes to Policy on Self-Supporting Part-Time Graduate Professional Degree Programs

Dear Bill,

The University Committee on Planning and Budget (UCPB) has reviewed UCOP's proposed revisions to the 2011 policy for Self-Supporting Part-Time Graduate Professional Degree Programs (SSGPDP). UCPB supports the effort to revise and clarify the policy; however, we are concerned about several specific areas within it, and also have more general concerns about the role of SSGPDPs within the University.

First, the revision is more thorough compared to the existing document. It enhances the language requiring SSGPDPs and state-supported programs to be subject to an identical level of faculty approval and oversight. It also includes new annual certification requirements for SSGPDPs and additional reporting about financial accessibility. The main addition to the revised policy appears to be a new protocol for initiating and approving the conversion of existing state-supported programs to self-supporting status. The policy requires conversions to meet the same criteria and be subject to the same review protocol as new SSGPDPs and expresses the expectation that conversions should be rare. It restricts sponsoring departments to use only allowed funds (non-state) for the support of either existing self-supporting programs or converted programs should they either fail to attain the capacity to be self-supporting or lose this capacity. UCPB supports these elements of the revision to the extent that they fill a policy gap and clarify the Senate's oversight role over proposed conversions.

On the other hand, the policy does not provide the Senate with a sound basis for identifying what should constitute an SSGPDP as distinct from other graduate degree programs, or provide clear guidelines for judging whether a proposal for an SSGPDP is appropriate. The 2011 policy lists four specific criteria expected to be present in an SSGPDP. While the new policy references those criteria—noting for example, that SSGPDPs should be limited to graduate professional degrees that cater to non-traditional populations—it seems to somewhat dilute them by

suggesting only that "many SSGPDPs" tend to have certain characteristics but without providing a distinct set of criteria that should characterize any SSGPDP.

UCPB is concerned about the extent to which the policy gives a green light to additional conversions without requiring departments to provide an academic-based justification for them. The policy notes that SSGPDPs are now a "necessary educational strategy" that will allow UC to "serve a greater number of students above and beyond that which State resources will support." It is clear from this language that the university is now looking at the self-supporting model as a money-making strategy to help campuses and departments through lean budget times. UCPB is concerned that SSGPDPs will form primarily for their potential to generate revenue rather than for strong academic reasons. We are concerned that academic quality and UC's public service mission are at risk if revenue potential becomes a major driver of academic decisions. Proposing programs primarily to "make money," even in a general sense, distorts the educational mission of UC. The criteria for formation of an SSGPDP should be tightened and be focused on a clear academic opportunity and/or need, not a financial opportunity.

UCPB is also concerned that SSGPDPs will divert resources—particularly faculty time and talent—away from UC's primary educational mission to programs that are not core to that mission. The policy notes that ladder-rank faculty who teach in SSGPDPs cannot have that teaching count toward their state-supported workload and requires SSGPDPs to define all direct and indirect costs to the program and campus associated with delivering and housing the program. It seems inevitable, however, that these programs will divert resources from the department, college, and/or campus. To the extent that they involve ladder-rank faculty in teaching roles, this can only be accomplished by sacrificing some existing activity. And if the courses are taught largely or entirely by non-ladder faculty there is a potential for sacrifice of academic quality. At the very least, the policy should require an SSGPDP proposal to make a case for how it will operate without detracting from the sponsoring unit's core academic mission or diverting funds from the academic division, school or campus.

In addition, UCPB is concerned that the level of financial accountability the policy requires of SSGPDPs may not be sufficient to prevent conflicts of interest. For example, to the extent that the primary oversight of SSGPDPs is at the department, college or even campus level, and these entities benefit from new funding generated from an SSGPDP, regardless of whether it is self-sufficient, there is a potential conflict of interest in honestly assessing whether a program is truly self-supporting. Many of the costs associated with running an SSGPDP will be comingled with the overall costs of running a department, making it difficult to separate from expenses related to the non-SSGPDP parts of the department or college. Perhaps the only way to deal with this is to have very structured accounting rules set up that apply to every SSGPDP.

Finally, there is the issue of academic quality. The current "rules" only suggest that an SSGPDP will be shut down if it fails to meet and maintain financial independence. There is far less basis to judge the academic quality of an SSGPDP compared to a regular academic department, since the primary mission will be teaching rather than the broader academic mission of a regular department or program where teaching is only one measure of quality, with scholarly research and university/professional activity as equally important measures. The implicit assumption is that a program that continues to attract sufficient fee-paying customers will be judged a success. This certainly represents a completely new basis for judging "quality," and is one with which we do not agree.

In addition to diverting resources from the general campus, there may be other unintended consequences of transforming more state supported programs to self-supporting programs, including damage to the public perception of UC and relations with the State.

UCPB recognizes the current document as another step forward in establishing principles and operational rules for SSGPDPs. But, we still feel that there are major issues that are not adequately addressed, and we recommend further development of the policy.

Sincerely,

Donald Senear UCPB Chair

Donald Felt Seman

cc: UCPB

Martha Winnacker, Senate Executive Director