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February 21, 2023

**MICHAEL DRAKE, PRESIDENT
KATHERINE NEWMAN, PROVOST AND EXECUTIVE VICE PRESIDENT
ACADEMIC SENATE DIVISION CHAIRS**

Re: Assembly Approval of Revisions to Senate Regulations 610 and 630

Dear Colleagues:

At its February 8 meeting, the Assembly of the Academic Senate approved revisions to Senate Regulations 610 and 630, updating the residency prerequisite for an undergraduate bachelor's degree. The revisions were proposed by the University Committee on Educational Policy (UCEP) and endorsed by the Academic Council following a systemwide Senate review. The revisions have been incorporated into the online Manual of the Systemwide Academic Senate¹ and are detailed in Attachment 1 to this letter.

The revisions add a new Regulation 630.E, defining a "campus experience requirement" that requires freshman and transfer undergraduates to complete a minimum of six units of in-person courses during a quarter/semester for one year, with in-person course defined as having at least 50% of instruction occur face-to-face. The Assembly also approved an amendment to the definition of residency in Senate Regulation (SR) 610 to align with the new SR 630.E.

As explained in Attachment 3, the 50% in-person instruction requirement draws from definitions grounded in the rules of UC's accreditor, the Western Association of Schools and Colleges (WASC) as well as minimum engagement requirements for federal financial aid.

Regulation 630.E closes a loophole that had allowed for the potential creation of fully online degree programs and may have led to students having limited or no access to on-campus resources and activities. While this regulation defines UC's commitment to an in-person educational experience, it also opens the door for campuses to experiment with online majors and minors and to innovate with hybrid programs and alternative modes of course delivery that will benefit undergraduate students. Included as Attachment 2 is a UCEP letter addressing questions and considerations for online degrees and articulating the benefits of the revisions, including fostering persistence, academic success, and inclusive access to the full array of UC campus resources and experiences.

¹ <https://senate.universityofcalifornia.edu/bylaws-regulations/regulations/rpart3.html#r610>

I ask you to circulate this notice to relevant and interested faculty and administrators. Please do not hesitate to contact me if you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Cochran". The signature is fluid and cursive, with the first name "Susan" being more prominent than the last name "Cochran".

Susan Cochran, Chair
Academic Council

Cc: Assembly of the Academic Senate
Senate Division Executive Directors
Executive Director Lin

**ATTACHMENT 1: REVISIONS TO SENATE REGULATIONS 610 AND 630 APPROVED BY
THE ASSEMBLY OF THE ACADEMIC SENATE ON FEBRUARY 8, 2023**

APPENDIX: CURRENT REGULATIONS ([link](#))

Chapter 1. General Provisions

Article 1. Residence

610.

Residence in any regular term is validated for an undergraduate student by enrollment in at least six units of courses that were created through the Divisional course approval process of the student's home campus and in accordance with requirements of 630.E. Residence in any regular term is validated for a graduate student with programs of instruction or research approved by the Graduate Council of the student's home campus.

Chapter 2. Requirements for the Bachelor's Degree

Article 1. General Requirements

630.

- A. Except as otherwise provided in this section and SR 614, 35 (or 24 semester) of the final 45 (or 30 semester) units completed by each candidate for the ~~B~~achelor's degree must be earned in residence in the college or school of the University of California in which the degree is to be taken. (Am 9 Mar 83; Am 23 May 01)
- B. When two or more campuses of the University of California have approved a joint program of study, a student enrolled in such a program may meet the Requirement requirement stated in Paragraph A paragraph (A) above by completing the requisite number of units in courses offered at any or all of the participating campuses. The student's program of study must be approved by the Provost, Dean, or equivalent officer of the School of College in which the degree is to be awarded. (En 13 May 97; Am 10 Nov 04)
- C. A further exception to the rule stated in paragraph (A) above is made in the case of students who meet the residence requirement as provided in [SR 614](#). (Am 10 Nov 04)
- D. Except when Divisional Regulations provide otherwise, a student in the Education Abroad Program, the UC Washington, D.C., Program, the UC Center in Sacramento Program, or the NRS California Ecology and Conservation Course, which are systemwide courses, may meet the residence requirement in accordance with the following provisions: (Am 27 May 99; Am 10 Mar 04; Am 10 Nov 04; Am 10 Apr 17)
 1. A student who completes the graduation requirements while in a systemwide course may satisfy the requirements stated in paragraph (A) in the final 45 (or 30 semester) units preceding the student's entrance into a systemwide course. (Am 9 Mar 83; Am 10 Mar 04; Am 10 Apr 17)
 2. Subject to the prior approval of the department concerned, a student who is enrolled in a systemwide course may satisfy the residence requirement by earning 35 (or 24 semester) of the final 90 (or 60 semester) units, including the final 12 (or 8 semester) units, in residence in the

college or school of the University of California in which the degree is taken. (Am 7 Jun 72; Am 9 Mar 83; Am 10 Mar 04; Am 10 Apr 17)

- E. Each undergraduate student must complete a campus experience requirement. A minimum of six units of course credits per quarter (or semester) for three quarters (or two semesters) completed by each candidate for the bachelor's degree must be earned in courses designed to deliver to any enrolled student at least 50 percent of in-person instructional hours on any campus of the University of California or physical locations affiliated with programs listed in SR 630.D or in prison environments. To satisfy this requirement, at least two quarters or one semester must be completed during the regular academic year, with no more than one quarter or semester completed during the summer. "In-person" means instructors and students are in the same physical location. "Instructional hours" refer to time when instructors are presenting to or interacting with students during designated class times (e.g., lecture, laboratory, discussion, field work, problem sessions). For the purposes of this regulation, instructional hours do not include office hours, or recorded lectures provided as a supplement to designated hours interacting with students. Individual Divisions may maintain a higher threshold for required in-person course credits per term or for the number of terms in which a threshold applies.
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ATTACHMENT 2: LETTER FROM UCEP

January 16, 2023

**SUSAN COCHRAN, CHAIR
ACADEMIC COUNCIL**

RE: UCEP's REVISED AMENDMENT TO SENATE REGULATION 630

Dear Susan,

UCEP has reviewed and discussed the feedback from the systemwide review of the committee's proposed amendment to Senate Regulation (SR) 630, and we are pleased to transmit to Academic Council a revision of the proposed new paragraph 630.E. The revised proposal addresses most of the concerns raised by the divisions and standing Senate committees and reframes the residency requirement as the "campus experience requirement." One notable concern raised was that several campuses could not comply with the new requirement since they were not keeping track of online course offerings. We suggest a grace period to allow these campuses to develop a course tracking system and provide a rationale for course mode tracking in Appendix 1: information about online instruction and accreditation, federal financial aid correspondence courses and additional notes defining terminology in the new paragraph.

Questions and considerations for online degrees and majors:

1. *What is the difference between an online degree and an online major?*

A **degree** is completed when ALL of the campus requirements for that degree are met – this includes GE courses, majors courses, and electives that meet the minimum credits required to graduate. Degree accreditation states that if 50% or more of the courses for a degree can be taken online, then that is a distance education program (online degree – see attachment 1). Requirements for a **major** are presented in the course catalog as a specific group of classes required to be taken for that major.

Planning for an online degree requires knowing the mode of instruction for all courses on campus. This is complicated if some course modes are not fixed (e.g., courses might be offered as both online or in-person). A benefit in considering the online major only is that these courses are usually limited to one department or program, allowing the course mode to be set and an online major to be defined within a department or program.

2. *Will this regulation prevent online majors?*

No – students will be required to take 6 units in person for three quarters or two semesters. Most students enroll for 14-16 units per term; consequently, 8-10 units could be devoted to online course offerings per term for the year on campus. Having some in-person course opportunities for online majors would enhance those majors by offering a larger collection of courses and electives.

3. *Will this regulation prevent online degrees?*

Well, it depends. No, if the program allows some in person courses, these can be accommodated in a manner similar to that of the online majors (see above). Yes, if the program is fully online (programs designed to exclude all in-person classes). If the SR 610-630 campus experience regulation is approved, fully online degrees would only be permitted by a variance through the Systemwide Senate. However,

fully online degrees might create a second class of students who are not welcome on campus and who would not benefit from campus resources. Evidence shows that fully online programs are very isolating and have poor graduation rates.

4. *What are the benefits of a minimum one-year campus experience?*

Graduation rates for online undergraduate degree programs are notoriously low compared to degrees with curricula with all or mostly in-person courses. We know that undergraduate students taking classes in person often perform academically better than those taking classes online and, that students learning in-person are more likely to complete the course. Online instruction can be diminished and made ineffective by technology problems that simply don't exist in live classrooms. Moreover, in-person courses allow for face-to-face interactions with a diverse population of students; this is important in challenging biases that students might have when entering the university.

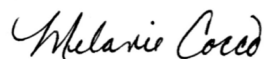
Campuses provide a large array of student resources (e.g., counseling, health care, gyms) as well as social activities, opportunities for peer connections, and connecting with future collaborators. Attending classes in person is part of a student's professional development: time management, showing up for meetings prepared and effective personal communication are important skills for a successful career. For transfer students in particular, an onboarding experience could be significant in helping them feel that they are part of the University community. Faculty and staff are more likely to see if a student is distressed when in person. Interactions online have been shown to be more transactional and limited to specific information in the course whereas in person classes allow for casual conversations before and after class and produce more informal mentoring.

5. *What courses count as online?*

Any course that has 50% or more of the instruction hours are online or remote – these are the hours when one would be lecturing or interacting with students in a classroom for a comparable in-person class.

The committee asks that Academic Council endorse the revised proposal for SR 630.E. UCEP appreciates the opportunity to comment on this matter. Please contact me if you have any questions.

Sincerely,



Melanie Cocco, Chair
UCEP

ATTACHMENT 3 RATIONALE TO DOCUMENT ONLINE INSTRUCTION:

Both the Accreditation Commission and Federal Regulations maintain requirements that are specific to Online courses (defined as 50% or more instruction online). For this reason, it is recommended that UC Divisions track their Online course offerings including the engagement activities in those courses.

Accreditation of the University to educate students in California is performed by the Western Senior College and University Commission (WSCUC; formerly WASC). They define an online course as one where 50% or more of instruction/interaction is online (see below). Online courses must “*support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.*” UC courses that include 50% or more of instruction/interaction online should be designated as online courses for the purpose of WSCUC accreditation review. “*Institutions must obtain substantive change approval for programs in which 50% or more of the (degree) program (units for completion of the program) will be offered through distance education.*” For UC students, the “program” refers to a degree. In the case of a transfer student, the “program” consists only of the courses taken at UC to complete a degree (online courses taken prior to transfer are not considered in the 50% calculation).

Federal financial aid rules require at least two engagement activities for online instruction (see below). If requested, an institution should be able to provide a list of courses with online instruction and their engagement activities.

Correspondence courses are defined as having online instruction but do not have sufficient engagement activities. For example, a course that posted recorded videos without an engagement activity specific to that content could be called a Correspondence Course. *Federal financial aid* cannot be given to students who take more than 50% of their units (credits) as Correspondence Course format (see below).

- WSCUC accreditation review occurs every 10 years. However, once a campus starts to offer degree programs online, it is the campus responsibility to submit a “Substantive Change Proposal” to WSCUC – regardless of the time since the last accreditation review.
- Federal Financial Aid audits occur every year.

WSCUC (WASC) Definition of online course and (degree) program:

<https://wascsenior.app.box.com/s/6oju46p2b6mklgigo2om>

Page 17, DISTANCE EDUCATION PROGRAMS – online course definition

...WSCUC considers a distance education course to be one in which 50% or more of the instruction and interaction occurs using one or more of the technologies included in the definition of distance education, with the faculty and students being physically separate ...

Distance Education is defined as: Education that uses one or more of the technologies listed below to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.

An institution ensures regular interaction between a student and an instructor or instructors by, prior to the student's completion of a course or competency - (i) Providing the opportunity for substantive interactions

with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and (ii) Monitoring the student's academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed on the basis of such monitoring, or upon request by the student.

WSCUC (WASC) New (Online) Degree Program Proposal Instructions

Institutions must obtain substantive change approval for programs in which 50% or more of the program (units for completion of the program) will be offered through distance education.”

<https://wascsenior.app.box.com/s/c3v95f0nzpmodcadfbhl>

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1.b If this proposal involves distance delivery of any portion of the curriculum, describe how the program meets expectations for “Academic Engagement” and “Faculty-Initiated Regular and Substantive Interaction” as defined by the federal regulations (see Code of Federal Regulations §600.2 Academic Engagement & Distance Education). Identify where/how these required elements are incorporated into the proposed program.

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4.a Describe how “Regular and Substantive Interaction” is monitored, by whom, and how often?

7.b. If applicable, explain how comparative assessment of program outcomes for students in different program modalities will be conducted (including assessments of student learning outcomes, student retention, and student satisfaction) including appropriate comparisons with campus-based programs.

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5. If 50% or more of the program will be offered via distance education, describe the provisions available to faculty to determine that the enrolled student is the student completing the coursework. How will the identity of students participating in the program be verified?

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7.b If 50% or more of the program will be offered via distance education, describe the preparedness of faculty to support the modality of instruction. What faculty development opportunities are available? Include any faculty guidelines for online instruction and/or web links to online training resources.

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4. If 50% or more of the program will be offered via distance education, provide a detailed description of the type of distance education modality being proposed and the format (asynchronous, synchronous, online, teleconference, video on demand, etc.).

Federal Definition of Online Course requirements for Financial Aid

<https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-600>

(Definition of Instructional Clock Hour)

(1) A period of time consisting of -

- (i) A 50- to 60-minute class, lecture, or recitation in a 60-minute period;
- (ii) A 50- to 60-minute faculty-supervised laboratory, shop training, or internship in a 60-minute period;
- (iii) Sixty minutes of preparation in a correspondence course; or
- (iv) In distance education, 50 to 60 minutes in a 60-minute period of attendance in -

(A) A synchronous or asynchronous class, lecture, or recitation where there is opportunity for direct interaction between the instructor and students; or

(B) An asynchronous learning activity involving academic engagement in which the student interacts with technology that can monitor and document the amount of time that the student participates in the activity.

3) An institution must be capable of monitoring a student's attendance in 50 out of 60 minutes for each clock hour under this definition.

Distance education (cont):

(required engagement activities – must provide interactions between instructor and student)

(4) For purposes of this definition, substantive interaction is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also **includes at least two of the following:**

- (i) Providing direct instruction;
- (ii) Assessing or providing feedback on a student's coursework;
- (iii) Providing information or responding to questions about the content of a course or competency;
- (iv) Facilitating a group discussion regarding the content of a course or competency; or
- (v) Other instructional activities approved by the institution's or program's accrediting agency.

Correspondence Course Financial Aid Handbook

<https://fsapartners.ed.gov/knowledge-center/fsa-handbook/2020-2021/vol2/ch4-audits-standards-limitations-cohort-default-rates>

Students may NOT receive financial aid if the number of correspondence course units is more than 50% of their total course units in any given term.

...A school must calculate these percentages to demonstrate compliance with a requirement or to demonstrate eligibility for a limitation waiver. For each of the tests, the calculation performed by the school must be attested to by the independent auditor who prepares the school's audited financial statement or its FSA compliance audit. If a school's initial or previous calculation was in error, the auditor's report must be part of the audit workpapers and must include a recalculation. The auditor's attestation report must indicate whether the school's determinations (including any relevant waiver or exception) are accurate.