



Ahmet Palazoglu
Chair, Assembly of the
Academic Senate
Faculty Representative,
UC Board of Regents

Academic Senate

Office of the President
1111 Franklin Street
Oakland, CA 94607

senate.universityofcalifornia.edu

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November 20, 2025

Katherine S. Newman
Provost and Executive Vice President, Academic Affairs

Re: Systemwide Senate Review of Interim Presidential Policy for the
University of California's Use of Online Program Management Companies

Dear Provost Newman,

As requested, I distributed for systemwide Academic Senate review the Interim Presidential Policy for UC's Use of Online Program Management Companies (OPMs). All 10 Academic Senate divisions and two systemwide Senate committees ([UCEP](#), [UCFW](#)) submitted comments. These were discussed at the Academic Council's November 17, 2025 meeting, and the compiled feedback is attached for your reference.

The policy responds to recommendations from the California State Auditor (CSA) concerning UC's use of OPMs. It establishes systemwide standards to uphold academic integrity, transparency, and compliance with federal and accreditation requirements in OPM partnerships. The policy requires that students be informed when courses are taught by non-UC instructors employed by OPMs and that instructor affiliations and credentials be clearly disclosed. It prohibits enrollment-based financial incentives, outlines expectations for student interaction and assessment, and provides guidance for working with accredited and non-accredited affiliates. The policy currently applies to graduate-level programs but may extend to undergraduate programs as UC expands online course offerings.

Senate reviewers expressed general support for the intent of the interim policy to ensure academic integrity, transparency, and compliance with federal and accreditation standards in UC's partnerships with OPMs. They viewed the policy as an appropriate and necessary response to the CSA's findings and an important step toward establishing consistent systemwide standards to address identified risks. However, reviewers found that the policy would benefit from greater clarity and detail regarding faculty oversight, intellectual property, and implementation mechanisms.

Policy Scope and Definitions: Reviewers requested clarification of the

policy's scope, noting inconsistent references to courses, programs, and divisions, as well as conflation of terms such as "schools," "divisions," and "Extension." They recommended aligning terminology, clearly distinguishing between instructional and non-instructional OPM activities, and defining the policy's coverage as UC expands into undergraduate online instruction.

Senate Oversight: Reviewers emphasized that Senate review and continuing faculty oversight must apply to all OPM-affiliated courses and programs. UCEP specifically noted the need to align OPM-related instructional hiring with Senate Regulations [750A](#) and [800A](#), which govern faculty appointments and course approval. The committee also highlighted variation in Professional and Continuing Education hiring practices across campuses and recommended stronger coordination and oversight to ensure consistency and academic standards.

Instructor Qualifications and Transparency: Faculty supported disclosure of instructor affiliation and credentials but questioned the usefulness of fine distinctions among UC-employed and UC-contracted instructors. Several noted that professional programs may appropriately prioritize industry experience over traditional academic credentials.

Student Data Privacy and Security: There was strong concern about protecting student information handled by third-party vendors. Reviewers urged that all OPM contracts undergo IT security and privacy review consistent with UC data protection policies and that data retention and recovery protocols be clearly specified.

Intellectual Property and Course Ownership: Reviewers sought explicit assurance that instructional materials developed by UC instructors remain UC or faculty property and that UC retains control over the use and withdrawal of content hosted by OPM platforms.

Course Evaluation: Reviewers supported student evaluations but advised aligning them with UC's established evaluation practices, supplementing them with peer or faculty review and periodic program-level assessments similar to academic program reviews. UCEP recommended that evaluations include items addressing the adequacy of online modality support for students.

Compliance, Accountability, and Transparency: While reviewers supported the prohibition on incentive-based compensation, they found enforcement provisions vague and recommended clearer accountability for campuses and vendors, defined consequences for violations, and greater transparency into UC's OPM relationships. Many suggested a systemwide registry or regular reporting of contracts, financial terms, and oversight outcomes, and encouraged UC to build internal capacity for

online program management to safeguard academic quality.

Overall, Senate reviewers support the policy's goals and urge UCOP to strengthen provisions related to faculty oversight and appointment processes, clarify terminology and scope, specify data and intellectual property protections, and establish robust enforcement and transparency mechanisms before issuing a final policy.

Thank you for the opportunity to opine. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Palazoglu', with a stylized flourish at the end.

Ahmet Palazoglu
Chair, Academic Council

cc: Academic Council
Director of Academic Planning and Policy Corona
Senate Division Executive Directors
Senate Executive Director Lin



320 STEPHENS HALL

UNIVERSITY OF CALIFORNIA

November 4, 2025

AHMET PALAZOGLU

Academic Senate Chair

Subject: Berkeley Division comments – Presidential Interim Policy for UC's Use of Online Program Management Companies

Dear Chair Palazoglu,

On November 3, 2025, the Berkeley Division of the Academic Senate's Divisional Council (DIVCO), the executive body of the Berkeley Academic Senate, discussed the *Presidential Interim Policy for the University of California's Use of Online Program Management Companies*. The discussion was informed by written comments from the Committees on Academic Planning and Resource Allocation (CAPRA); Courses of Instruction (COCI); and Graduate Council (GC).

DIVCO is supportive of the interim policy and highlights the concerns in COCI's letter. Specifically, they note that it may be important to have regular review by Academic Senate faculty of courses offered through these platforms, beyond just the initial review of the course as it is established. Additionally, COCI raises important concerns regarding the sharing of student data with third parties, and the ability to secure student data when the company is no longer under campus management.

I also point out the suggested revisions in CAPRA's letter. The first recommendation is to provide more clarity between "UC-employed instructor" vs. "UC-contracted instructor" in Provision III.A.3.a. The second suggestion is to consider if the requirement "The University must ensure that external instructors meet the same or equivalent academic and/or professional standards as (1) campus-employed faculty for those teaching in degree programs" might be excessive.

I encourage you to read the enclosed committee comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Stacey'.

Mark Stacey

Chair, Berkeley Division of the Academic Senate

Enclosures

cc: Thomas Philip, Vice Chair, Berkeley Division of the Academic Senate
Monica Lin, Executive Director, UC Systemwide Academic Senate
Jocelyn Surla Banaria, Executive Director, Berkeley Division of the Academic Senate
Jason Wittenberg, Chair, Committee on Academic Planning and Resource Allocation
Evan Williams, Chair, Committee on Courses of Instruction
Mark Csikszentmihalyi, Chair, Graduate Council
Sumei Quiggle, Associate Director staffing Graduate Council
Milo Knight, Senate Analyst, Committee on Academic Planning and Resource Allocation
Rachel Marias Dezendorf, Senate Analyst, Committee on Courses of Instruction



October 22, 2025

PROFESSOR MARK STACEY
Chair, Berkeley Division of the Academic Senate

*Re: CAPRA comments on the interim Presidential Policy for the University of California's
Use of Online Program Management Companies*

At its meeting on October 22, 2025, the Committee on Academic Planning and Resource Allocation (CAPRA) discussed the interim Presidential Policy for the University of California's Use of Online Program Management Companies. We appreciate the opportunity to share our perspective on this policy.

CAPRA's scope includes liaison and advice on matters relating to budget and planning. Overall, CAPRA considers the interim policy largely appropriate and reasonable from the perspective of the charter and scope of CAPRA. We think it will support the goals of the university, to develop knowledge and educate students.

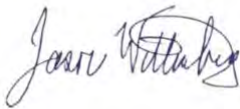
We recommend minor revisions, as outlined below. Specifically, we have detailed comments on two aspects of the policy:

In Provision III.A.3.a, the difference between "UC-employed instructor" vs "UC-contracted instructor" is not clear, and we suspect that it might be hard for potential students to understand the implications of this distinction. It is not clear to us whether such a distinction will be valuable to students or needs to be made by online programs. For on-campus courses and UC Extension courses, it is our understanding that we do not consider it necessary to disclose whether the instructor's employment agreement is structured as a contractor vs employee.

In Provision III.A.3.d, we wonder if the requirement "The University must ensure that external instructors meet the same or equivalent academic and/or professional standards as (1) campus-employed faculty for those teaching in degree programs" might be excessive. Different standards may be appropriate for, for example, PhD programs vs online Masters programs. Some online programs, e.g., online Masters programs targeted at working professionals or enabling professional careers, might reasonably use different academic and/or professional standards for instructors. For example, a professional Masters program might reasonably place a high value on industry experience or professional experience without

requiring outstanding distinction in research or significant experience in undergraduate teaching. We suspect this is a difference from how most campus-employed faculty are currently evaluated. For example, for campus-employed faculty who will be heavily engaged in research and teaching for PhD programs, criteria typically include outstanding distinction in research; for campus-employed faculty who will be heavily engaged in teaching for undergraduate programs, criteria typically include excellence and experience in undergraduate teaching; and often experience in industry cannot substitute for those other qualifications for campus-employed faculty; but for instructors who will be teaching an online Masters degree, experience in industry might reasonably be weighted higher than outstanding distinction in research or experience in undergraduate teaching. We are concerned that requirement III.A.3.d could place an excessive burden on revenue-generating programs, to the detriment of the financial sustainability of the University. One possibility is that the provision could be revised to state "The University must ensure that external instructors meet the same or equivalent academic and/or professional standards as either campus-employed faculty or UC-contracted instructors."

Thank you for the opportunity to comment.

A handwritten signature in dark ink, appearing to read "Jason Wittenberg". The signature is fluid and cursive, with the first name "Jason" and last name "Wittenberg" clearly distinguishable.

Jason Wittenberg
Chair, Committee on Academic Planning and Resource Allocation



320 STEPHENS HALL
UNIVERSITY OF CALIFORNIA

MARK STACEY
Chair 2025-2026 Berkeley Division of the Academic Senate

October 9, 2025

RE: Presidential Interim Policy for UC's Use of Online Program Management Companies

On September 12, 2026 the Committee on Courses of Instruction (COCI) discussed the use of Online Program Management Companies at UC Berkeley. COCI agreed that the interim policy clearly states how programs must be transparent to students about the program's relationship to main campus and fully endorsed disclosure to the maximum extent possible. While it was agreed that the use of online program management companies to facilitate practical aspects of instruction by Berkeley instructors could be useful, COCI felt that broader use of online program management companies to teach entire courses should generally be discouraged unless compelling programmatic issues are identified. COCI affirmed that all Berkeley courses must be approved the Senate Faculty (through the COCI review process, except for Law courses). All Berkeley courses would therefore be initially approved by COCI regardless of being on campus or online. The policy discusses course evaluations, but only in terms of student evaluations. It does not clarify how the course will be evaluated by Berkeley faculty on an ongoing basis outside of course modifications that would go through the COCI review process. COCI sees this as a blind spot in ensuring the quality of a Berkeley education.

COCI is concerned about sharing student data with third parties and the ability to secure student data when it is no longer under campus management. In establishing relationships with third party Online Program Management Companies, it should be a priority for campus to ensure the security of student data whether that be identifying information, grades or contact information.

COCI is aware that there are already Online Program Management Companies that Berkeley works with for some courses, and that the use of these companies for solving practical issues related to instruction can be beneficial. However, they strongly disagree with this approach for more comprehensive instruction that is not primarily provided by Berkeley instructors and would prefer to see coursework maintained on campus under standard overview procedures.

Sincerely,

A handwritten signature in cursive script that reads 'Evan Williams'.

Evan Williams
Chair, Committee on Courses of Instruction 2025-2026



October 23, 2025

PROFESSOR MARK STACEY
Chair, Berkeley Division of the Academic Senate

Re: *GC comments on the proposed Presidential Interim Policy for
UC's Use of Online Program Management Companies*

Dear Chair Stacey,

At our October 6 meeting, the Graduate Council (GC) reviewed the proposal to create an interim policy for UC use of OPMs. We support the policy and its prohibitions on incentive-based compensation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Csikszentmihalyi'.

Mark Csikszentmihalyi
Chair, Graduate Council



DAVIS DIVISION OF THE ACADEMIC SENATE
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academicsenate.ucdavis.edu

November 5, 2025

Ahmet Palazoglu
Chair, Academic Council

RE: Presidential Interim Policy for the UC's Use of Online Program Management Companies

Dear Ahmet,

The Presidential Interim Policy for the UC's Use of Online Program Management Companies was distributed to all standing committees of the Academic Senate. Eight committees responded: Faculty Welfare (FWC), Graduate Council (GC), Undergraduate Council (UGC), and the Faculty Executive Committees of the College of Agricultural and Environmental Sciences (CAES), the College of Biological Sciences (CBS), the College of Letters and Science (L&S), the Graduate School of Management (GSM), and the School of Medicine (SOM).

Several committees note that the interim policy ensures compliance with appropriate federal and state regulations and accreditation standards, standardizes teaching and evaluation processes across the UC system for Online Program Management (OPM) companies, and aligns with the UC's values and standards for instruction. GSM highlights that the impact of this policy may be significant for non-degree programs, such as continuing education and certificate offerings. UGC adds that any future use of OPMs for full-time degree programs would merit careful scrutiny, especially regarding the additional administrative burden of updating listings, conducting annual audits, and collecting evaluation data.

L&S, UGC, and CAES highlight a few concerns and questions related to the interim policy and the use of OPMs more broadly. While the cover letter states that this policy establishes guidelines for University partnerships with OPM companies to uphold academic integrity, among other things, L&S expresses concern about maintaining academic integrity in OPM-affiliated offerings. L&S also expresses concern regarding the impact of OPMs on admissions and enrollment, and questions how we can oversee this impact. UGC highlights their concern that the California State Auditor's (CSA) report revealed that OPM-run courses were misrepresented as UC offerings, and wonders which departments are already using OPMs, how these arrangements benefit students, and what circumstances truly require OPM-hired instructors versus UC faculty and instructors. Similarly, CAES questions what prompted the audit by the CSA and asks what the perceived benefits of hiring an outside company to manage these courses rather than vetting and hiring lecturers to manage the course internally are. CAES also wonders whether every OPM instructor should be reviewed and appointed as a lecturer to ensure that they meet UC standards, and whether the interim policy reflects a move to start offering third-party online courses for students for credit.

CBS, GC, and UGC provide a few additional comments and recommendations for consideration. CBS and GC suggest that course evaluations and student feedback for OPMs should be done in accordance with existing guidelines that are in place for traditional classroom and in-person courses. UGC supports the policy's goals, but recommends including more detailed guidance on its scope, impact metrics, and criteria for any changes as they pertain to undergraduate education before any broader adoption.

The Davis Division appreciates the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathryn Niles Russ'.

Katheryn Niles Russ, Ph.D.
Chair, Davis Division of the Academic Senate
Professor of Economics
University of California, Davis

Enclosed: Davis Division Committee Responses

c: Monica Lin, Executive Director, Systemwide Academic Senate
Michael LaBriola, Assistant Director, Systemwide Academic Senate
Edwin M. Arevalo, Executive Director, Davis Division of the Academic Senate

October 28, 2025

Katheryn (Kadee) Russ

Chair, Davis Division of the Academic Senate

RE: Presidential Interim Policy for the UC's Use of Online Program Management Companies

As delegated by Graduate Council, the Graduate Council Academic Planning and Development Subcommittee (APD) has reviewed the **Presidential Interim Policy for the UC's Use of Online Program Management Companies**. Overall, the APD did not have any reservations about the interim policy but recommended that language be added requiring that student evaluations be done in accordance with the guidelines that are in place for in-person courses.

Thank you for the opportunity to provide comments on the **Presidential Interim Policy for the UC's Use of Online Program Management Companies**.

October 31, 2025

Katheryn Russ

Chair, Davis Division of the Academic Senate

RE: Request for Consultation: Presidential Interim Policy for the UC's Use of Online Program Management Companies

Dear Kadee:

The Undergraduate Council (UGC) has reviewed and discussed the request for consultation Presidential Interim Policy for the UC's Use of Online Program Management Companies.

Members raised concerns that the auditor's report revealed misrepresentation of OPM-run courses as UC offerings, even though the policy currently applies only to graduate and extension programs, not to undergraduate education. UGC agreed that any future use of OPMs for full-time degree programs would merit careful scrutiny, especially regarding additional administrative burden of updating listings, conducting annual audits, and collecting evaluation data.

UGC also raised questions concerning background information necessary to fully assess this policy: Which departments are already using OPMs? How do these arrangements benefit students? And, under what circumstances are OPM-hired instructors truly necessary versus UC Faculty/Instructors? While we welcome more transparent disclosure, because the current policy does not presently affect undergraduates, members found it challenging to comment on this policy as they did not have sufficient information, context, or expertise related to this matter. Overall, the UGC supports the policy's goals but would need more detailed guidance on its scope, impact metrics, and criteria for any changes as they pertain to undergraduate education before any broader adoption.

Thank you for giving UGC the opportunity to comment on this policy.

A handwritten signature in dark ink, appearing to read "David Kyle", is centered within a light gray rectangular box.

David Kyle

Chair, Undergraduate Council

October 24, 2025

Katheryn Russ

Chair, Davis Division of the Academic Senate

RE: Request for Consultation – Presidential Interim Policy for the UC's Use of Online Program Management Companies

Dear Chair Russ:

The Committee on Faculty Welfare has reviewed the RFC – Presidential Interim Policy for the UC's Use of Online Program Management Companies. Overall, the committee feels that the proposed interim policy is necessary and ensures compliance with appropriate Federal and state regulations and accreditation standards. However, it was noted that the document requires further editing as the verbs/subjects don't always match and there's inconsistencies with punctuation in the lists.

Sincerely,

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

Janet Foley
Chair, Committee on Faculty Welfare

Presidential Interim Policy for the UC's Use of Online Program Management Companies

FEC: College of Biological Sciences Committee Response

October 31, 2025

The CBS FEC has reviewed and discussed the Presidential Interim Policy for the UC's Use of Online Program Management Companies and faculty agreed that standardizing teaching evaluation processes across the UC system is a good idea and should align with existing standards for in-person and remote instruction. They emphasized that course evaluations and student feedback for these activities should clearly follow the same guidelines used for traditional classroom courses.

Unabridged faculty comments:

Seems like a good idea to standardize these teaching activities across the system and indeed, evaluated consistent with the general standards of teaching at the UC in the classroom or remotely.

With regards to 'Course Evaluation Process and Student Feedback', it should be clarified that the evaluation process follows the same guidelines as for our in-person course evaluations.



UC Davis Graduate School of Management

ONE SHIELDS AVENUE
DAVIS, CALIFORNIA 95616-8734

October 26, 2025

To: Professor Kathryn Russ

Chair, Davis Division of the Academic Senate

From: Graduate School of Management Faculty Executive Committee (FEC)

Re: Request for Consultation – Presidential Interim Policy for the UC's Use of Online Program Management Companies

Dear Chair Russ,

The Faculty Executive Committee of the Graduate School of Management has reviewed the Request for Consultation (RFC) on Presidential Interim Policy for the UC's Use of Online Program Management Companies.

For degree-granting programs, all proposed policies—including instructor transparency, course evaluations, a prohibition on incentives in admissions, and compliance with accreditation—are obvious essential requirements that must be followed, regardless of the program's format or the involvement of third-party services. These policies align with the university's values and standards for instruction. The impact of this policy may be particularly significant for non-degree programs, such as continuing education and certificate offerings, where standards are not as rigorously upheld.

The Graduate School of Management Faculty Executive Committee appreciates the opportunity to comment on this issue.

Presidential Interim Policy for the UC's Use of Online Program Management Companies

FEC: College of Letters and Science Committee Response

October 31, 2025

The L&S FEC is concerned about the impact of third-party online program management on admission and enrollment in our programs; how do we oversee this impact? We are also concerned about maintaining academic integrity with third-party online program management.

Presidential Interim Policy for the UC's Use of Online Program Management Companies

FEC: College of Agricultural and Environmental Sciences Committee Response

October 31, 2025

After reviewing the RFC materials, CAES FEC provided the following comments:

What prompted the audit by the California State Auditor? It would be nice to know the context in which OPMs are being considered for use and what the perceived benefit is of hiring an outside company to manage these courses rather than vetting and hiring lecturers to manage the courses via internal UC services.

Related to that, why shouldn't every instructor be reviewed and appointed as a lecturer? Wouldn't that allow UC to assure that they meet our standards? We assume that there is a financial model indicating the external OPM option is a better choice, but with the complication that the instructors aren't UC employees. We note that this policy tries to address aspects of the financial model like banning certain incentives while also supporting maintaining quality standards.

Finally, we raise the question of whether this policy reflects a move to start offering 3rd party online courses for our students for credit within the UC? It is difficult to understand the potential use of this policy. More background would have helped to understand where the policy is meant to be applied.

Opacity notwithstanding it seems useful to make sure that the affiliation of each and every instructor is listed and UC faculty don't derive recruitment benefits by pushing students into those classes. However, that potential issue really raises the question of any potential move at a system level to replace UC academic programs with offerings from third party online providers.

November 5, 2025

**AHMET PALAZOGLU
CHAIR, ACADEMIC COUNCIL**

Re: Presidential Interim Policy for UC's Use of Online Program Management Companies

The Irvine Division Cabinet discussed the Presidential Interim Policy for UC's Use of Online Program Management Companies at its meeting on November 4, 2025. The Council on Educational Policy (CEP) and the Graduate Council (GC) also reviewed the proposal. The councils' feedback is attached for your review.

The Irvine Division appreciates the opportunity to comment.

Sincerely,



Jane Stoever, Chair
Academic Senate, Irvine Division

Cc: Lisa Grant Ludwig, Chair Elect, Academic Senate
Jisoo Kim, Executive Director, Academic Senate
Gina Anzivino, Associate Director, Academic Senate

October 8, 2025

Jane Stoever, Chair
Academic Senate, Irvine Division

Re: Presidential Interim Policy for UC's Use of Online Program Management Companies

The Council on Educational Policy (CEP) discussed the Presidential Interim Policy for UC's Use of Online Program Management (OPM) Companies at its meeting on October 2, 2025.

The council agreed that having guardrails in place to uphold academic integrity, transparency, and compliance with federal accreditation standards was important but questioned how compliance would be monitored and whether enforcement would be effective, particularly in the non-degree granting space. Some members understood that the policy was interim pending UC severing all ties with OPMs, however, this was not clear from the materials provided. Finally, members found the California State Auditor's report to be damning, and they were generally opposed to the UC's use of OPMs in most all circumstances.

The council appreciates the opportunity to comment.

Sincerely,



Maia Young, Chair
Council on Educational Policy

Cc: Lisa Grant Ludwig, Chair Elect-Secretary
Jisoo Kim, Executive Director
Gina Anzivino, Associate Director & CEP Analyst

October 22, 2025

JANE STOEVER
CHAIR, ACADEMIC SENATE

RE: Presidential Interim Policy for UC's Use of Online Program Management Companies

At its October 9, 2025 meeting, Graduate Council reviewed the Presidential Interim Policy for UC's Use of Online Program Management (OPM) Companies.

Background

OPMs are third party contractors that offer services for online educational content including course development, recruitment, marketing, technical support and student support services. A recent audit by the California State Auditor identified 51 contracts with OPMs in the UC system for graduate and continuing education (none for undergraduates). Issues they identified included inconsistencies across campuses, lack of evaluation and oversight, poor (or even misleading) communication with students, and potential risks for violating federal laws with financial incentives.

The goals of the policy that was drafted in response to the audit are to a) establish transparency for students, b) ensure a course evaluation system, and c) maintain compliance with federal regulations and d) comply with accreditation agencies.

- A. *Instructor transparency for online courses.* The draft policy requires UC campuses to provide students with explicit information about their course instructor (*i.e.*, a UC-employee or an external OPM instructor), as well as their qualifications. External instructors must be approved by the campus and the University must provide a UC-affiliated contact for academic support and guidance. A designee on each campus will be responsible for enforcement. Non-compliance may result in corrective actions such as further review or contract termination.
- B. *Course evaluation and student feedback.* There should be a comprehensive course evaluation system that provides feedback on both course content and instructor performance.
- C. *Prohibition of Incentive-Based Compensation.* Federal regulations prohibit compensation for student recruitment, admissions or financial aid decisions. A specific practice that was highlighted in the audit was tuition revenue sharing or bonus payments to entities that recruit graduate and continuing education students. The draft policy specifies prohibited activities that violate federal regulations and permissible activities such as general advertising, collecting contact information and providing student support after financial disbursement.

In addition, UC Legal drafted supplemental guidance about bundled services. Tuition-sharing is permissible under two arrangements. The first is services such as student counseling, advertising and collecting contact information. The second is a “bundled services exception” in which a third party provides a complete set of bundled services, operates independently from the institution, does not make admissions decisions, does not prohibited compensation and is not paid separately for recruitment.

D. Compliance with Western Association of Schools and Colleges (WASC) accreditation standards. Compliance with WASC for maintaining academic quality, integrity and intuitional effectiveness already applies to all UC Programs. The proposed policy would ensure that these existing standards apply to OPMs.

Recommendation

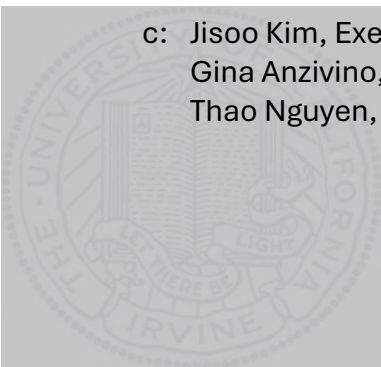
- A. The proposed policy includes reasonable recommendations for creating transparency and better oversight. However, one transparency issue that was described in the audit, but not in the policy draft, was ensuring that UC OPM programs provide accurate and up-to-date information about program outcomes and employability on websites and marketing materials. This information is critical for students to make informed decisions about their education and careers, and we recommend adding this to the policy.
- B. The proposed course evaluation process appears to be equivalent to what already exists for regular course evaluations. We have no further recommendations.
- C. The proposed policy would ensure that campuses and OPMs adhere to existing federal laws and follow practices similar to what already exists for undergraduates. We have no further recommendations.
- D. The proposed policy would enforce compliance with WASC standards that already apply to the UC system. We have no further recommendations.

On behalf of the Graduate Council,



Baolin Wu, Chair

c: Jisoo Kim, Executive Director
Gina Anzivino, Associate Director
Thao Nguyen, Graduate Council Analyst



November 7, 2025

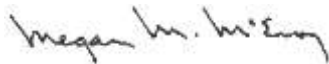
Ahmet Palazoglu
Chair, UC Systemwide Academic Senate

Re: (Systemwide Senate Review) Interim Presidential Policy for the University of California's Use of Online Program Management Companies

Dear Chair Palazoglu,

The UCLA divisional Executive Board (EB) reviewed the Interim Presidential Policy for the University of California's Use of Online Program Management Companies and the committee/council feedback at their meeting on November 6, 2025. EB members agreed to send the feedback from the divisional councils and committees for your review.

Sincerely,



Megan McEvoy
Chair, UCLA Academic Senate

Encl.

Cc: Kathy Bawn, Immediate Past Chair, UCLA Academic Senate
April de Stefano, Executive Director, UCLA Academic Senate
Tim Groeling, Vice Chair/Chair Elect, UCLA Academic Senate

October 31, 2025

Megan McEvoy, Chair
Academic Senate

Re: Systemwide Senate Review: Interim Presidential Policy for the University of California's Use of Online Program Management Companies

Dear Chair McEvoy,

At its meeting on October 27, 2025, the Council on Planning and Budget (CPB) reviewed and discussed the Interim Presidential Policy for the University of California's Use of Online Program Management Companies. Members offered the following comments.

Members discussed the evolving landscape of online program management (OPM) partnerships and the need for robust institutional oversight. CPB members generally support a policy that ensures effective management of program costs, maintaining high academic quality, and that is clear on the financial and legal risks involved in the use of commercial online companies. A full risk assessment should be a required step before contracting with any OPM. This analysis must be accompanied by full transparency and disclosure of all terms and potential risks.

In summary, CPB members strongly suggested that any policy related to OPM agreements must thoroughly address risk management through mandatory, transparent risk assessments and disclosure. Furthermore, the policy must safeguard the core academic values, specifically by ensuring the optimal balance of program cost, academic quality, and clear access to information regarding the nature of the partnership.

If you have any questions for us, please do not hesitate to contact me at desjardins@ucla.edu or via the Council's analyst, Elizabeth Feller, at efeller@senate.ucla.edu.

Best regards,

Richard Desjardins, Chair
Council on Planning and Budget

cc: Tim Groeling, Vice Chair/Chair-Elect, Academic Senate
Kathleen Bawn, Immediate Past Chair, Academic Senate
April de Stefano, Executive Director, Academic Senate
Elizabeth Feller, Associate Director, Academic Senate
Members of the Council on Planning and Budget

3125 Murphy Hall
410 Charles E. Young Drive East
Los Angeles, California 90095

October 13, 2025

To: Megan McEvoy, Chair, Academic Senate

From: Dorota Dabrowska, Chair, Graduate Council

Re: (Systemwide Senate Review) Interim Presidential Policy for the University of California's Use of Online Program Management Companies

At its meeting on October 10, 2025, the Graduate Council discussed the interim Presidential Policy of the University of California's use of online program management companies. Members recommend clarifying the definition for online program management (OPM) companies. It was not clear what types of companies and products would be classified as OPMs.

We appreciate the opportunity to express our views on this matter. If you have any questions, please contact us via Graduate Council Analyst, Emily Le, at ele@senate.ucla.edu.



OFFICE OF THE ACADEMIC SENATE

Kevin Mitchell, Chair of the Academic Senate
senatechair@ucmerced.edu

UNIVERSITY OF CALIFORNIA, MERCED
5200 North Lake Road
Merced, California 95343

October 17, 2025

To: Ahmet Palazoglu, Chair, Academic Council

From: Kevin Mitchell, Chair, Divisional Council (DivCo)

Re: [Presidential Policy for the UC's Use of Online Program Management Companies](#)

The Presidential policy sets standards for the University of California's partnerships with Online Program Management (OPM) companies to ensure academic integrity, transparency, and compliance with federal and accreditation requirements in UC's partnerships with OPM providers. The policy incorporates supplemental guidance from UC Legal on bundled OPM services and addresses key areas including instructor transparency, course evaluation and student feedback, prohibitions on incentive-based compensation, and compliance with rules governing non-accredited entities.

The policy was distributed to the Merced Division Senate Committees and School Executive Committees for review. The following committees submitted comments, which are appended to this memo.

- Admissions and Financial Aid Committee (AFAC)
- Graduate Council (GC)
- Undergraduate Council (UGC)
- School of Natural Sciences Executive Committee (NSEC)

At its October 15 meeting, DivCo discussed the various committees' comments. A summary of the comments follows; readers are encouraged to refer to the appended memos for more detailed commentary. DivCo affirms its support for the committees' recommendations and wishes to underscore several additional points of concern:

- The policy should explicitly affirm intellectual property rights, ensuring that faculty retain ownership of instructional materials developed for OPM-affiliated courses.
- The policy should clarify the decision-making structure, particularly the mechanisms that safeguard departmental authority over whether their courses or programs engage with OPM.

- It should explicitly state that Senate approval is required for all courses delivered through OPM partnerships.
- The policy should clearly differentiate between course approval and course delivery, recognizing that Senate oversight must extend beyond initial approval to the ongoing quality and integrity of instruction.
- Finally, the policy should specify how feedback on the continued need for OPM-affiliated programs will be gathered and reviewed to ensure that such partnerships remain academically justified.

Summary of Committee Comments:

To enhance accountability, **AFAC** recommends that the policy include language encouraging the designation of a Senate faculty member to oversee courses taught by external OPM instructors, thereby ensuring their quality and academic integrity of course delivery.

GC found the interim policy reasonable and appropriate in response to the 2023 State Auditor's report but observed that its high-level language could present challenges for implementation. GC also identified potential inconsistencies in how the policy defines its scope and recommended clarifying whether Senate faculty review is required for all external instructors, including those in Extension and Professional and Continuing Education (PACE). In addition, GC emphasized the importance of ongoing, periodic faculty oversight of OPM-affiliated program to ensure sustained quality and compliance.

UGC endorsed the policy as written. UGC noted that, to date, these OPM have not been used to deliver undergraduate degree programs.

DivCo appreciates the opportunity to comment on this policy, and for considering the feedback provided by the Merced Division's Senate committees. DivCo affirms its support for the thoughtful observations and recommendations offered by the committees.

Cc:
 DivCo Members
 School Executive Committee Chairs
 UCM Senate Office
 UCOP Senate Office

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ACADEMIC SENATE, MERCED DIVISION
ADMISSIONS AND FINANCIAL AID COMMITTEE (AFAC)
JOEL SPENCER, CHAIR

UNIVERSITY OF CALIFORNIA, MERCED

September 18, 2025

To: Kevin Mitchell, Chair, Divisional Council

From: Admissions and Financial Aid Committee (AFAC)

Re: [Presidential Policy for the UC's Use of Online Program Management Companies](#)

At the September 15, 2025 AFAC meeting, members reviewed the *Presidential Policy for the UC's Use of Online Program Management Companies* and offer the following comments:

The interim policy highlights instructor transparency in advertising, enhancing student experience through robust course evaluations, and selecting an Online Program Management (OPM) based on accreditation. AFAC recommends that, in order to strengthen accountability, the policy include language encouraging the designation of a Senate faculty member when a course is taught by an external instructor from an OPM company. This individual would have oversight and leadership responsibility for ensuring the quality and integrity of course delivery.

AFAC thanks you for the opportunity to review and comment on the *Presidential Policy for the UC's Use of Online Program Management Companies*.

Cc: AFAC Members
Senate Office



ACADEMIC SENATE, MERCED DIVISION
GRADUATE COUNCIL (GC)

UNIVERSITY OF CALIFORNIA, MERCED

September 22, 2025

To: Kevin Mitchell, Chair, Divisional Council (DivCo)

From: Irene Beattie, Chair, Graduate Council (GC)

Re: [Presidential Policy for the UC's Use of Online Program Management Companies](#)

At the September 8, 2025 Graduate Council (GC) meeting, voting members reviewed the Presidential Policy for the UC's Use of Online Program Management Companies and offer the following comments.

Overall, GC found the interim policy to be reasonable, particularly in response to the 2023 audit by the California State Auditor. GC did not identify any issues with the interim policy's prescribed requirements; however, since these requirements are specified at a high level, there may be issues with their implementation.

GC believes there to be potential vagueness and conflicting information regarding the types of courses in which the interim policy applies. The scope of the first requirement, *Instructor Transparency for Online Courses*, is defined as "all online courses listed on UC campus websites that utilize an OPM company" (page 2 of the interim policy). The scope of the second requirement, *Course Evaluation Process and Student Feedback*, is defined as "all university undergraduate, graduate, and Extension courses that use OPMs" (page 3 of the interim policy). GC wonders if the slight difference in scope is intentional.

Furthermore, GC found the following language to be vague: "all online courses listed on UC campus websites" (page 2 of the interim policy). GC questions whether the courses are expected to be listed and whether this includes short, non-credit, non-Extension courses, such as those offered by a Center, etc.

GC notes that the current policy appears to assume that Divisions and/or Schools, and by extension Senate faculty, will review and approve external instructors. However, this assumption may not hold uniformly across all campuses, particularly in units such as Extension or Professional and Continuing Education (PACE). To avoid ambiguity, the policy should explicitly clarify whether Senate faculty review is required in all cases involving external instructors.

Moreover, GC recommends that Senate faculty be systematically involved in the ongoing review of course and instructor evaluation results. Programs should not be approved on a one-time basis without continued faculty oversight. Instead, GC recommends periodic reviews of programs involving Online Program Management (OPM) entities. These reviews should be conducted through committees such as the Periodic Review Oversight Committee (PROC) to ensure appropriate accreditation oversight, consistent with the process applied to other academic programs.

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ACADEMIC SENATE, MERCED DIVISION
UNDERGRADUATE COUNCIL (UGC)

UNIVERSITY OF CALIFORNIA, MERCED

September 12, 2025

To: Kevin Mitchell, Chair, Academic Senate

From: Susan Varnot, Chair, Undergraduate Council (UGC)

Re: [Presidential Policy for the UC's Use of Online Program Management Companies](#)

The Undergraduate Council (UGC) reviewed *the Presidential Policy for the UC's Use of Online Program Management Companies* and offers the following comments:

Background:

Online Program Management companies (OPMs) are third-party contractors used to support undergraduate, graduate, and continuing education courses. While all UC campuses (except SF) utilize OPMs for continuing education, no undergraduate programs currently utilize OPMs for educational delivery. OPMs provide increased capacity (e.g., staff support), expertise (e.g., marketing and technology), and discretionary funding that many departments lack (e.g., money to launch a new degree program). OPM programs are also typically self-supporting and do not receive state funding.

The issue:

A recent audit of five UC campuses that use OPMs identified several issues surrounding misleading information related to:

1. financial charges
2. employability after completing a program/market demand
3. credentials of the OPM faculty

The proposal:

The policy proposes to require all programs that use OPMs to clearly indicate this on their websites and course listings and prohibit any financial incentives for OPMs to recruit students into programs.

UGC believes that the policy clearly addresses each of the issues identified by the auditors, and members have no critical comments.

UGC is pleased to endorse the *Presidential Policy for the UC's Use of Online Program Management Companies* and thanks you for the opportunity to review the proposal.

Cc: Senate Office
UGC Members

From: [Jennifer Manilay](#)
To: [Fatima Paul](#); [ucm senatechair](#)
Cc: [Michael Dawson](#); [Susan DeRiemer](#); [Jay Sharping](#); [Mayya Tokman](#); [Tao Ye](#); [Michael Findlater](#); [Angelina Gutierrez](#)
Subject: RE: [Systemwide Review Item] Presidential Policy for the UC's Use of Online Program Management Companies (Due by 9/22/25)
Date: Monday, September 22, 2025 11:08:08 AM

Dear Fatima and Kevin (NSEC members cc'd):

NSEC has reviewed the proposed policy and wishes to raise a few concerns and questions for consideration.

It is concerning that the policy acknowledges and permits courses to be offered by non-UC instructors (Sections III.A.1, III.A.3). While such cases require prior review by UC faculty within the offering unit and a procedure for compliance and accountability, this raises questions about review practices and the rationale for investing in external for-profit companies rather than strengthening internal capacity. Short-term economic justifications may exist, but prioritizing them risks creating long-term dependencies.

Sections C and D provide important safeguards, though they do not fully address the concerns outlined above.

Sincerely,

Jennifer O. Manilay, PhD (*pronounced mah-NEE-lie, sounds like "money-lie"*)
Professor, Dept. of Molecular and Cell Biology
Chair, Natural Sciences Executive Committee AY-25-26
School of Natural Sciences
University of California, Merced
jmanilay@ucmerced.edu

Pronouns: she/her/hers



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

Kenneth Barish
PROFESSOR OF PHYSICS AND ASTRONOMY
RIVERSIDE, CA 92521-0217
TEL: (951) 827-5023
EMAIL: kenneth.barish@ucr.edu

November 1, 2025

Ahmet Palazoglu, Chair, Academic Council
1111 Franklin Street, 12th Floor
Oakland, CA 94607-5200

RE: Presidential Interim Policy for UC's Use of Online Program Management Companies

Dear Ahmet,

On October 27, 2025, the Riverside Academic Senate Executive Council discussed the *Presidential Interim Policy for UC's Use of Online Program Management Companies* along with comments received from divisional committees. Executive Council was generally supportive. However, feedback from local committees was mixed as a number of local committees sought additional information. Though those details are in the attached memos, essentially, feedback reveals that revisions are needed to provide essential context and establish clear policies regarding academic ownership, financial governance, external personnel review, and compliance with faculty evaluation standards.

Sincerely yours,

A handwritten signature in blue ink that reads "Kenneth Barish".

Kenneth Barish
Professor of Physics and Astronomy and Chair of the Riverside Division

CC: Monica Lin, Executive Director of the Academic Senate
Cherysa Cortez, Executive Director of UCR Academic Senate Office



Academic Senate

COMMITTEE ON ACADEMIC PERSONNEL

October 17, 2025

To: Kenneth Barish, Chair
Riverside Division Academic Senate

From: Shaun Bowler, Chair
Committee on Academic Personnel

A handwritten signature in black ink, appearing to read 'Shaun Bowler'.

Re: [Systemwide Review] Interim Policy: *Presidential Interim Policy for UC's Use of Online Program Management Companies*

At our meeting on October 1, 2025, the Committee on Academic Personnel (CAP) discussed the *Presidential Interim Policy for UC's Use of Online Program Management Companies*. CAP members felt that the university should retain and clearly state ownership and copyright of all university courses, including those delivered in partnership with an online program management company; and any courses offered through online program management companies should be integrated into the university's Canvas learning management system to ensure consistency, oversight, and access control. But the issues raised in the interim policy do not fall within the remit of the Committee on Academic Personnel.



College of Humanities, Arts, and
Social Sciences
EXECUTIVE COMMITTEE

October 17, 2025

TO: Ken Barish, Chair
Riverside Division of the Academic Senate

FROM: Iván Aguirre, Interim Chair
CHASS Executive Committee

RE: Interim Policy: Presidential Interim Policy for UC's Use of Online Program
Management Companies

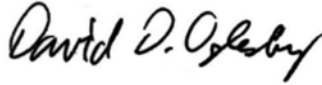
The CHASS Executive Committee reviewed the Interim Policy: Presidential Interim Policy for UC's Use of Online Program Management Companies. The committee is concerned about the language used regarding evaluation and prefers the policy states that it does not rely solely on student evaluations of teaching. The APM mandates that two different pieces of evidence of teaching should be reviewed at each merit and promotion review, while noting that this mandate is not recognized by all departments, as some may rely heavily on the number of evaluations and the comments of student evaluations to represent the two different pieces of evidence, which it should not. The committee recommends that the policy clarifies that other forms of evaluation, such as peer or external evaluations, be included in the evaluation process.

PLANNING AND BUDGET

October 7, 2025

To: Kenneth Barish, Chair
Riverside Division

From: David Oglesby, Chair
Committee on Planning and Budget

A handwritten signature in black ink that reads "David D. Oglesby".

Re: [Systemwide Review] Interim Policy: *Presidential Interim Policy for UC's Use of Online Program Management Companies*

The Committee on Planning and Budget (CPB) reviewed the *Presidential Interim Policy for UC's Use of Online Program Management Companies*. CPB has the following questions and comments:

- Why do course evaluations for online program management (OPM)-supported courses not use the same (recently revised) course evaluations that all other UCR courses use?
- When for-profit OPMs hire faculty, the document requires that they are accompanied by “information stating that they have been reviewed and approved by the division/school offering the program.” (Page 3)
 - What is the mechanism by which outside contract faculty are reviewed to be able to become approved or not approved?
 - Students need to be reassured that when they are getting a UCR degree, that UCR has a significant investment in that program.
- Are we looking at a potential future in which outside profit-making management is in competition with UC staff (unionized and local) and faculty? It is not clear what the financial and personnel implications of such a move would be.

TO: Ken Barish, Chair
Riverside Division

FR: Kurt Schwabe, Chair 
Executive Committee, School of Public Policy

RE: **[Comments] Systemwide Review of Presidential Interim Policy for the University of California's Use of Online Program Management Companies**

Date: October 13, 2025

The Executive Committee of the School of Public Policy has reviewed the **Systemwide Review of Presidential Interim Policy for the University of California's Use of Online Program Management Companies**. We appreciate the effort and recommendations provided by the Online Program Management Workgroup in developing guidelines on issues surrounding instructor transparency, course evaluations and student feedback, and as well as prohibitions against incentive-based compensation for recruitment, admissions, or awarding financial aid. With that said, we have a few additional thoughts that we hope will be useful to consider.

First, there appears to be no current policy regarding the use of revenue sharing (or fee for service) arrangements as they relate to use of OPMs. It is fairly common for OPMs to retain 40-60 percent of student revenues (i.e., tuition)¹ when using a revenue sharing model, sometimes for the student's entire academic career. Thus, implementing OPMs could potentially have significant impacts for academic programs and colleges. Awareness, transparency, and monitoring of these sharing agreements would be useful, even for programs across the UC system to better understand what the "market" looks like.

Second, and related to the first point, there appears to be no current policy regarding the ability of students to receive university or campus-based financial aid (such as graduate assistantships) if they are recruited to online classes via OPMs. Given the revenue structure that is typical of OPMs, some universities do not allow students recruited by OPMs to receive any sort of university or campus-based financial aid. This structure could again potentially have significant impacts for academic programs and colleges.

Third, there appears to be no current policy regarding the ability of a student who has been recruited by an OPM into online courses to either take some amount of classes on campus or fully transfer to an on-campus version of an academic program (or vice versa), and what the revenue implications for such students would be to academic units.

¹ See, for example, page 10 of the following report: <https://www.p3edu.com/wp-content/uploads/2022/03/P3%E2%80%A2EDU-100.pdf>

Fourth, Section II of the policy explains that OPMs may be used for “recruitment, marketing, technical support and student support services.” There could be increased guideline and monitoring of how OPM efforts in these areas intersect with current campus efforts. For instance, how would the use of OPMs interface with existing UC campus recruitment, marketing, technical support, and student support services, if at all? How would the UC ensure that current program information is provided by OPMs?

Fifth, Section III.A.3.a of the policy references the use of external instructors provided by OPM companies to deliver University of California courses. Although the interim policy does state that external instructors meet the same or equivalent academic/professional standards as either campus-employed faculty (for degree programs) or contracted instructors (for non-degree programs), the Executive Vice Chancellor and Provost are listed as the enforcement mechanism for this policy, which appears to be a review of websites and marketing materials (see Section III.A.4). The vetting, appointment, and reappointment process for external instructors provided by OPMs is not currently mentioned in the policy. Consistent with shared governance, academic units should have input as to the use, vetting, appointment, and reappointment of OPM-provided instructors.





Academic Senate

COMMITTEE ON EDUCATIONAL POLICY

October 3, 2025

To: Ken Barish, Chair
Riverside Division

From: Annie Ditta, Chair
Committee on Educational Policy

Re: Presidential Interim Policy for UC's Use of Online Program Management Companies

The Committee on Educational Policy (CEP) reviewed the Presidential Interim Policy for UC's Use of Online Program Management Companies at their October 3, 2025 meeting. The Committee was not able to fully evaluate the policy as it did not provide context for information on how many online programs are present in the UC System and if this policy is only applicable for graduate level academic programs.



Academic Senate

COMMITTEE ON COURSES

October 16, 2025

To: Ken Barish, Chair
Riverside Division

From: Emma Stapely, Chair
Committee on Courses

Re: Presidential Interim Policy for UC's Use of Online Program Management Companies

The Committee on Courses reviewed the Presidential Policy for UC's use of online program management companies at their October 9, 2025 meeting and noted concern that the policy did not provide enough information for the Committee to evaluate the proposal. The Committee recommends that additional context for what programs utilize the companies would be helpful to allow them to evaluate the proposal.



September 24, 2025

TO: Ken Barish, PhD, Chair, Academic Senate, UCR Division

FROM: Adam Godzik, Ph.D., Chair, Faculty Executive Committee,
UCR School of Medicine

SUBJECT: **[Systemwide Review] Interim Policy: *Presidential Interim Policy for UC's Use of Online Program Management Companies***

Dear Ken,

The SOM Faculty Executive Committee has reviewed the Presidential Interim Policy for UC's Use of Online Program Management Companies.

The committee would like to state that the School of Medicine does not use the Online Program Management Companies. However, the committee agrees that the policy aims to ensure clarity on program quality, faculty involvement, and prevent reputational damage.

Yours sincerely,

DocuSigned by:

F3F7FC0ECB4E4AD...

Adam Godzik, Ph.D.
Chair, Faculty Executive Committee School of Medicine



OFFICE OF THE ACADEMIC SENATE

9500 GILMAN DRIVE
LA JOLLA, CALIFORNIA 92093-0002
TELEPHONE: (858) 534-3640
FAX: (858) 534-4528

November 10, 2025

Professor Ahmet Palazoglu
Chair, Academic Senate
University of California
VIA EMAIL

Re: Divisional Review of the Presidential Interim Policy for the University of California's Use of
Online Program Management Companies

Dear Chair Palazoglu,

The Presidential Interim Policy for the University of California's Use of Online Program Management Companies was distributed to San Diego Divisional Senate standing committees and discussed at the November 3, 2025 Divisional Senate Council meeting. Senate Council endorsed the proposal but had concerns about necessary details that were missing from the policy. The following comments were offered for consideration.

1. **Privacy and Security Review:** Reviewers agreed with the interim policy's emphasis on instructor transparency, accountability, and compliance in collaborations with third-party Online Program Management (OPM) vendors. However, the policy does not clearly define how student and instructional data handled by OPM vendors will be governed or protected. Given that OPM platforms often collect sensitive data, all OPM contracts should be subject to a formal IT security, privacy, and compliance review that aligns with UC's IS-3 framework and existing data-governance standards.
2. **Academic Governance and Transparency:** While the policy ensures instructor disclosure, it does not clarify who has oversight over instructional content, pedagogy, or analytics. Any OPM-produced instructional material should be disclosed explicitly, and instructor disclosures should be placed prominently in public course descriptions and syllabi. The "UC-affiliated contact" for academic support should be a UC instructor of record, providing students with a direct link to university oversight. The Senate should be assigned a defined oversight role or at minimum be included as a formal reporting channel so that it can monitor and address academic integrity concerns arising from OPM partnerships. Clear provisions should be added to safeguard faculty and institutional ownership of course materials, guarantee withdrawal rights, enforce UC ethical standards, and ensure transparency in data use and branding. The policy provides limited detail on consequences for non-compliance of the policy's requirements so clear enforcement provisions should be added to ensure accountability.
3. **Annual Vendor Evaluation:** OPM providers should be evaluated annually by collecting feedback from students and departments. Renewal decisions should consider whether the vendor continues to align with UC's educational mission and ethical standards.
4. **Course Evaluation and Student Feedback:** The section on course evaluation lacks specificity. The policy should identify the party responsible for reviewing evaluations, describe how poor evaluations will be addressed, and require evaluations to be conducted independently of the OPM

vendor. Departments may guide the vendor on evaluation procedures, but a mechanism should be in place to verify compliance, analogous to the enforcement provisions found elsewhere in the policy.

The responses from the Divisional Committee on Academic Information Technology, Committee on Extended Studies, Educational Policy Committee, Graduate Council, and Undergraduate Council are attached.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Jo Plant".

Rebecca Jo Plant
Chair
San Diego Divisional Academic Senate

Attachment

cc: Akos Rona-Tas, Vice Chair, San Diego Divisional Academic Senate
Lori Hullings, Executive Director, San Diego Divisional Academic Senate
Monica Lin, Executive Director, UC Systemwide Academic Senate

October 30, 2025

CHAIR REBECCA PLANT
Academic Senate, San Diego Division

SUBJECT: Interim Policy for the Use of Online Program Management Companies

Dear Chair Plant,

At its October 27, 2025, meeting, the Committee on Academic Information Technology (CAIT) reviewed and discussed the report from the *“Interim Policy for the Use of Online Program Management Companies”*. CAIT unanimously supports the policy’s intent to ensure transparency, accountability, and compliance in UC partnerships with third-party OPM providers. The committee also recognizes the importance of this policy in maintaining academic integrity and protecting student interests across campuses.

From an information technology governance perspective, CAIT identifies several areas where additional clarity or safeguards would strengthen the policy’s implementation and oversight:

1. Data Governance and Privacy

The policy does not clearly define how student and instructional data handled by OPM vendors will be governed or protected. OPM platforms often collect sensitive data on student learning and engagement.

Recommendation: Require that all OPM contracts undergo formal IT security, privacy, and compliance review in alignment with UC’s **IS-3** and data governance standards.

2. Accessibility and Technology Standards

While the policy mentions transparency and instructor qualifications, it does not reference UC’s IT accessibility standards.

Recommendation: Explicitly require that all OPM-related instructional technologies and materials meet **UC IMT-1300** (IT Accessibility) and **WCAG 2.1 AA** compliance benchmarks.

3. Technology Oversight and Procurement

The policy assigns compliance to the EVC/P but omits technical vetting and procurement governance processes.

Recommendation: Require campus CIO and IT Executive Governance Committee (ITEGC) review of OPM platforms for data integration, authentication, and support compatibility with campus systems.

4. Academic Governance and Transparency

While the policy ensures instructor disclosure, it does not clarify oversight of technology-mediated course design or vendor influence.

Recommendation: Reinforce that academic content, pedagogy, and data analytics remain under Senate and faculty control, with disclosure of any OPM-developed instructional materials.

5. Systemwide Consistency and Reporting

Without coordination, different campuses risk adopting divergent OPM technologies and compliance standards.

Recommendation: Establish a systemwide registry of OPM partnerships, coordinated through UCACC and the systemwide CIO office. This registry should be accessible to each campus CIO and CAIT equivalent. CAIT also recommends that UCACC receive annual reports on OPM usage, accessibility, and data compliance.

Recent experiences of CAIT members with third-party educational platforms such as **DataCamp** highlight the importance of ensuring that UC retains full control over instructional content, data, and ethical standards in any external partnership. In that case, instructors who sought to withdraw their materials were denied by the company, underscoring risks around intellectual property ownership, content removal rights, and vendor accountability. To prevent similar issues, future UC engagements with OPM providers must include clear provisions safeguarding faculty and institutional ownership of course materials, guaranteeing withdrawal rights, enforcing UC ethical standards, and ensuring transparency in data use and branding.

In conclusion, CAIT supports the intent of the interim policy but recommends adding explicit provisions for **data protection**, **IT accessibility**, and **systemwide coordination** to ensure that UC's use of OPM vendors aligns with the University's principles of academic control, technological integrity, and student privacy.

Sincerely,

Barry Grant, Chair
Committee on Academic Information Technology

cc: J. Coomer
L. Hullings
N. Komarova
A. Rona-Tas

October 17, 2025

REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of Presidential Interim Policy for the University of California's Use of Online Program Management Companies

The Committee on Extended Studies (CES) discussed the Presidential Interim Policy for the University of California's Use of Online Program Management Companies at their October 13, 2025 meeting. The Committee had no objections to the interim policy, but offer the following comments for consideration:

1. **Enhancing Instructor Transparency:** The Committee recommends clarifying the placement of instructor disclosures to ensure they are prominently displayed in public course descriptions and syllabi. Additionally, specifying that the "UC-affiliated contact" for academic support be a UC faculty member of record would provide students with a more direct link to the University's academic oversight.
2. **Integrating Feedback and Monitoring Incentives:** To fully leverage student feedback, CES suggests integrating course evaluation data from OPM-supported courses into the University's standard program review cycles. For the long-term health of these partnerships, a periodic, central review of OPM contracts could help ensure that financial structures, like tuition-sharing models, continue to align with the policy's ethical standards.

These refinements could enhance the policy's excellent foundation, providing additional guidance to campuses and fostering even greater trust and transparency with students.

Sincerely,

Michael Pratt, Chair
Committee on Extended Studies

cc: J. Coomer
L. Hullings
A. Rona-Tas

October 22, 2025

PROFESSOR REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of the Presidential Interim Policy for the University of California's Use of Online Program Management Companies

At its October 20, 2025 meeting, the Educational Policy Committee (EPC) reviewed the Presidential Interim Policy for the University of California's Use of Online Program Management Companies. The Committee had no objections to the proposal. The Council offered the following comments for consideration:

- The Committee recommends that the policy include additional details on how the enforcement of learning objectives will be implemented and monitored.
- EPC recommends that the Academic Senate have a more defined role, or at minimum, a formal reporting mechanism, regarding OPM partnerships and outcomes, and that oversight be codified in the policy.
- The Committee suggests that the policy addresses how existing agreements may be impacted
- EPC also discussed broader concerns about the use of online program management companies that may fall outside the immediate scope of the policy but warrant future consideration:
 - o The potential for OPM-taught courses to reduce instructional opportunities for faculty and graduate students.
 - o The need for Senate review of OPM-taught courses and a distinct course designation, similar to the "R" designation used for online courses.

Sincerely,

Stanley Lo, Chair
Educational Policy Committee

cc: J. Coomer, Senior Senate Analyst
L. Hoang, Educational Policy Committee Vice Chair
L. Hullings, Senate Executive Director
A. Rona-Tas, Senate Vice Chair

October 20, 2025

PROFESSOR REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of the Presidential Interim Policy for the University of California's Use of Online Program Management Companies

At its October 6, 2025 meeting, the Graduate Council (GC) reviewed the Presidential Interim Policy for the University of California's Use of Online Program Management Companies. The Council had no objections to the proposal. The Council offered the following comments for consideration:

- The section on Course Evaluation and Student Feedback lacks clarity and oversight. It does not specify who is responsible for reviewing course evaluations, how poor evaluations should be addressed, or whether evaluations must be conducted independently. While departments could instruct the company on evaluation procedures, there is no mechanism to ensure compliance or accountability comparable to the enforcement provisions found in other sections.
- The Council recommends considering whether the university or departments could evaluate the company itself on an annual basis.
- Questions remain regarding how academic integrity will be maintained, how student return on investment will be assessed, and whether the policy can effectively ensure that academic standards are upheld.

Sincerely,

Sarah Gille, Chair
Graduate Council

cc: J. Coomer, Senior Senate Analyst
L. Hullings, Senate Executive Director
A. Gustafsson, Graduate Council Vice Chair
A. Rona-Tas, Senate Vice Chair

October 22, 2025

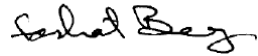
PROFESSOR REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of the Policy for the UC's Use of Online Program Management Companies

Dear Chair Plant,

At its October 10, 2025 meeting, the Undergraduate Council reviewed the Policy for the UC's Use of Online Program Management Companies. The Council had no objection to the proposal but expressed uncertainty regarding the specific issue this policy is intended to address. It is also unclear who will retain ownership of the materials used on these platforms and whether students will receive academic credit for these courses. Additionally, the policy appears to require significant oversight while outlining few, if any, consequences for noncompliance. The Council recommends that these questions be clarified prior to approval.

Sincerely,



Farhat Beg
Chair
Undergraduate Council

cc: Akos Rona-Tas, Senate Vice Chair
Lori Hullings, Senate Executive Director
Jenna Coomer, Senior Senate Analyst
James Cooke, Undergraduate Council, Vice Chair

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Errol Lobo, MD, PhD, Chair
Marta Margeta, MD, PhD, Vice Chair
Kartika Palar, PhD, MA, Secretary
Spencer Behr, MD, Parliamentarian

November 6, 2025

Ahmet Palazoglu
Chair, Academic Council
Systemwide Academic Senate
University of California Office of the President
1111 Franklin St., 12th Floor
Oakland, CA 94607-5200

Re: Systemwide Review of Presidential Interim Policy for the University of California's Use of Online Program Management Companies

Dear Chair Palazoglu:

The San Francisco Division of the Academic Senate has completed its review of the Presidential Interim Policy for the University of California's Use of Online Program Management (OPM) Companies. UCSF's Committee on Educational Policy (CEP) and Graduate Council (GRAD) commented on this review.

In brief, both CEP and GRAD emphasize the need to monitor OPM usage, noting that potential OPM bankruptcies could disrupt academic programs. In order to strengthen transparency and accountability, we recommend requiring clear notification whenever an OPM is involved in a program. GRAD specifically proposes adding a provision to the local Graduate Council's Regulations and Procedures that would require graduate programs to disclose OPM involvement in their initial proposals. Programs that later add or remove OPMs should also report these changes to their local Graduate Councils.

Please let me know if you have any questions about UCSF's comments.

Sincerely,

Errol Lobo, MD, PhD, 2025-27 Chair
UCSF Academic Senate

Enclosures (1)

Cc: Angel Kuo, Chair, Committee on Educational Policy (CEP)
Wayne Steward, Chair, Graduate Council (GRAD)

Graduate Council (GRAD)
Wayne Steward, PhD, MPH, BA, Chair

Committee on Educational Policy (CEP)
Angel Kuo, EdD, MSN, PNP, Chair

November 10, 2025

Errol Lobo, MD, PhD

Division Chair

UCSF Academic Senate

Re: Systemwide Review of Presidential Interim Policy for the University of California's Use of Online Program Management Companies

Dear Chair Lobo:

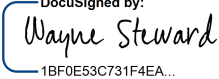
The Graduate Council (GRAD) and the Committee on Educational Policy (CEP) appreciate the opportunity to provide feedback on the [Systemwide Review of Presidential Interim Policy for the University of California's Use of Online Program Management Companies](#).

We recognize the policy's intent to establish clear guidelines for campuses and programs utilizing Online Program Management companies (OPMs), including requirements for transparency in instructor affiliations, regular course evaluations, prohibition of incentive-based recruitment practices, and adherence to accreditation standards. The enforcement measures outlined, including corrective actions for noncompliance, are also commendable.

GRAD and CEP stress the need to monitor OPM usage, as potential bankruptcies by OPMs could lead to disruptions in academic programs.^{1 2} To enhance transparency and accountability, we recommend requiring explicit notification when OPMs are involved in a program. GRAD, in particular, proposes incorporating a requirement into the Regulations and Procedures of the Graduate Council, mandating that graduate programs disclose OPM involvement in their initial proposals. Programs adding or removing OPMs should also report these changes to GRAD. The policy should further encourage detailed information regarding the role and scope of the specific OPM company involved.

Thank you for considering our input. Should you have any questions, please contact Executive Director Todd Giedt (todd.giedt@ucsf.edu) or CEP Analyst Sophia Root (sophia.root@ucsf.edu).

Sincerely,

DocuSigned by:

1BF0E53C731F4EA...
Wayne Steward, PhD, MPH
Chair, Graduate Council
UCSF Academic Senate

DocuSigned by:

FA8141D852C542A...
Angel Kuo, EdD, MSN, PNP
Chair, Committee on Educational Policy
UCSF Academic Senate

¹ <https://www.edsurge.com/news/2024-07-31-an-edtech-giant-declares-bankruptcy-what-might-it-mean-for-online-higher-ed>

² <https://changinghighered.com/the-state-of-edtech-opms-2u-bankruptcy-implications/>



UC SANTA BARBARA

Academic Senate
Rita Raley, Chair
Shasta Delp, Executive Director

1233 Girvetz Hall
Santa Barbara, CA 93106-3050
<http://www.senate.ucsb.edu>

November 10, 2025

To: Ahmet Palazoglu, Chair
Academic Senate

From: Rita Raley, Divisional Chair
Academic Senate

A handwritten signature in blue ink, appearing to read "R. Raley", is placed next to the "From:" line.

Re: Systemwide Senate Review of the Presidential Interim Policy for the University of California's Use of Online Program Management (OPM) Companies

The Santa Barbara Division distributed the Presidential Interim Policy for the University of California's Use of Online Program Management (OPM) Companies to the Graduate Council (GC), Undergraduate Council (UgC), Council on Planning and Budget (CPB), Committee on Courses and General Education (CCGE), Committee on Information Technology (CIT), and the Faculty Executive Committees (FECs) of the College of Letters and Science (L&S), College of Engineering (COE), College of Creative Studies (CCS), Gevirtz Graduate School of Education (GGSE), and the Bren School of Environmental Science and Management (BREN). CPB, as well as the L&S, CCS, GGSE, and BREN FECs, elected not to opine.

The Santa Barbara Division has very limited experience with Online Program Management (OPM) companies. In fact, our first proposal for an online degree program is currently under consideration, as noted by the Graduate Council. The interim policy was generally well-received by the reviewing agencies, which described it as "carefully considered" and "reasonable." Broad questions were also raised, however, on the use of externally provided instructors, academic quality, and oversight. Further details are available in the agencies' individual responses, attached for your consideration.

Thank you for the opportunity to opine.

**Academic Senate
Santa Barbara Division**

November 5, 2025

To: Rita Raley, Divisional Chair
Academic Senate

From: Joe McFadden, Chair
Graduate Council



Re: Policy for the University of California's Use of Online Program Management (OPM) Companies

At its meeting of November 3, 2025, Graduate Council reviewed the proposed Policy for the University of California's Use of Online Program Management (OPM) Companies and has the following comments.

The Council appreciates the creation of this policy in response to the California State Auditor's investigation into the use of OPMs in the UC system. Last year, the Council approved the creation of the very first online graduate degree program at UCSB. This program decided to use an OPM because UCSB's Office of Teaching and Learning is not equipped to offer similar services at such a large scale. While the approved program will use an OPM for a digital marketing campaign and for assistance with instructional design of course materials, the courses will be instructed by UCSB faculty members.

More broadly, the Council has raised several questions around the potential use of OPM instructors. Academic departments do a lot of work vetting ladder faculty and other instructional hires. How do we know the level of training and vetting the OPM does for its instructors? There is also concern that students will not understand the distinction between a course taught by a UCSB faculty member and an OPM instructor. One could say it is the responsibility of the department that is using the OPM to monitor instructional quality, but it is also a potential reputation issue for UCSB. Another question was whether courses that would otherwise employ OPM instructors be taught by UCSB graduate students instead, which would provide another source of graduate funding?

Many faculty on campus are still unsure about online modality for graduate courses and the Council wonders if the current systems are ready for the use of OPMs on campus. For example, what is the expected mechanism for feedback and evaluation of these courses? What happens if an existing, approved graduate course is switched to OPM instruction? Will such a course need to be re-approved by Graduate Council as being offered by a non-UC instructor, and how will this fit into the Coursera workflow?

CC: Shasta Delp, Executive Director, Academic Senate

UC **SANTA BARBARA**
Academic Senate

DATE: November 6, 2025

TO: Rita Raley, Chair
Academic Senate

FROM: Giuliana Perrone, Chair
Undergraduate Council 

RE: Policy for the University of California's Use of Online Program Management (OPM) Companies

The Undergraduate Council considered the interim policy on Online Program Management Companies at its November 6th meeting. Overall, Council members believe that the interim policy is carefully considered.

In particular, Council appreciates the interim policy's attention to transparency and accountability. The Council insists, however, that should OPM use expand beyond UC extension or self-supporting graduate programs, additional steps may need to be taken to ensure academic rigor and oversight. Courses would need to undergo the same senate approval process as any other course, and there would need to be further clarification about who owns the course content.

UC **SANTA BARBARA**
Academic Senate

DATE: November 6, 2025

TO: Rita Raley, Chair
Academic Senate

FROM: Andy Merolla, Chair 
Committee on Courses and General Education

RE: Policy for the University of California's Use of Online Program Management
(OPM) Companies

The Committee on Courses and General Education (CCGE) reviewed the Policy for the University of California's Use of Online Program Management (OPM) Companies during their meeting of October 28th. CCGE supports the policy overall. Committee members concur that the University should closely oversee all course offerings and routinely assess the quality of instruction and student access to courses of varying types.

CC: Shasta Delp, Executive Director, Academic Senate

DATE: November 10, 2025

TO: Rita Raley, Divisional Chair
Academic Senate

FROM: Christopher Kruegel, Chair
Committee on Information Technology

RE: Presidential Interim Policy on the University of California's Use of Online
Program Management Companies

On October 31st, the Committee on Information Technology (CIT) reviewed and discussed the Presidential Interim Policy on the University of California's Use of Online Program Management Companies. CIT did not have any particular comments on the interim policy itself. However, members felt that in the event OPMs become more widely used on the campus, the systemwide policy should not be the only protection against misuse, and that additional guidance and monitoring would be necessary.

October 23, 2025

TO: Rita Raley
Divisional Chair, Academic Senate

FROM: Dahlia Malkhi, Chair
College of Engineering, Faculty Executive Committee

RE: Policy for the University of California's Use of Online Program Management (OPM) Companies

Signed by:

Dahlia Malkhi

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The College of Engineering FEC met on October 21st and discussed the proposed policy. The committee agreed that the policy seems reasonable and did not voice concerns.



1156 HIGH STREET
SANTA CRUZ, CALIFORNIA 95064

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

November 10, 2025

AHMET PALAZOGLU
Chair, Academic Council

RE: Systemwide Review of Presidential Interim Policy for the University of California's Use of Online Program Management Companies

Dear Ahmet,

The Santa Cruz Academic Senate has reviewed the Systemwide Presidential Interim Policy for the University of California's Use of Online Program Management Companies. The Committees on Courses of Instruction (CCI), Educational Policy (CEP), Information Technology (CIT), Teaching (COT), and Graduate Council (GC) have responded.

The Santa Cruz Division acknowledges the necessity of prompt policy implementation to address the California State Auditor's Report, which includes recommendations to the UC Office of the President, as well as recommendations to individual campuses regarding their partnership with Online Program Management Companies (OPMs). The recommendations highlight the need for transparency, improved review and evaluation processes for OPM courses and instructors, and to expand guidance regarding incentive compensation to include graduate and continuing education students.

There is a small OPM presence at UC Santa Cruz (UCSC), currently including Coursera, and in UCSC Extension, Ziplines and the Center for Legal Studies. Main campus has a partnership with Coursera, a Massive Open Online Course (MOOC) provider. The courses listed in the audit are primarily graduate or continuing education courses, as noted by GC. UCSC was not singled out in the audit.

The majority of responding Senate committees acknowledged the argument for the creation of the Interim Policy on the Use of Online Program Management (OPM) Companies, viewing it as a mechanism to enhance transparency, student protection, and regulatory compliance, particularly for graduate and continuing education programs. The policy effectively implements the minimum recommendations of the California State Auditor's Report (2023-106) but leaves several structural

and governance issues unresolved. Multiple committees emphasize that Senate regulations (SR 750.A, SR 800.A) already restrict delegation of instruction or course design to non-UC faculty. Senate committees expressed three main concerns:

- 1) **Erosion of Senate Purview.** The responding committees strongly asserted the importance of Senate purview over curricula and instruction. They also requested clarification on policy definitions and made specific suggestions for improved implementation. Specifically, the policy fails to clarify how Senate review and approval apply when OPMs provide instruction or instructional materials for Senate-approved courses. There is deep concern that, without explicit boundaries, the policy could normalize external instruction, eroding Senate purview over curriculum, teaching appointments, and evaluation.
- 2) **Need for separation of instructional vs. non-instructional activities.** There is currently a lack of clear definition and distinction between instructional and non-instructional OPM activities. The policy treats all OPM activities—recruitment, marketing, course design, instruction—as a single category. This conceptual conflation risks obscuring distinctions between administrative outsourcing and academic functions, which require Senate oversight. Committees also found that current monitoring mechanisms are insufficient for detecting OPM involvement after course approval. Committees recommend a disclosure requirement when a course is proposed. A systemwide registry of approved OPMs, analogous to technology compliance lists, might be one solution to this issue. Finally, there is also ambiguity regarding Coursera’s status as an OPM, and whether its non-credit offerings fall also under the policy’s scope.
- 3) **External Instructor Evaluation.** Evaluation processes for “external instructors hired by OPMs” do not clearly align with Senate or Academic Personnel Manual (APM/CAPM) procedures. Committees therefore questioned how UC courses could legitimately be taught by instructors who are not formally appointed within a UC process. This points to a need for clarification of policy implications for self-governing entities such as the Academic Senate and CAP committees.

Finally, in addition to these areas several committees also raised a few additional more specific concerns. GC also recommends **more lenient withdrawal and refund policies** for courses managed through OPMs, to mitigate risks from potentially unstable or profit-driven partnerships. CIT notes concerns about **low retention and profit motives** in OPM-managed programs, underscoring the need for safeguards. COT requests clarification on the **purpose and use of contact information** collected under the policy, given the prohibition on solicitation.

Taken together, committee responses suggest the following key steps:

1. **Explicitly distinguish** instructional from non-instructional OPM functions to preserve academic governance.
2. **Reaffirm Senate authority** over curriculum, instructors, and course evaluation; integrate Senate review into OPM contract approval.
3. **Require ongoing disclosure and documentation** of OPM partnerships, including post-approval reporting and a centralized list of vetted providers.

4. **Clarify Coursera's classification** and its policy implications for non-credit and Extension offerings.
5. **Extend student protections**, especially refund/withdrawal flexibility, in OPM-managed courses.
6. **Engage in continued Senate oversight** as online and hybrid education expands.

Overall, while broadly supportive of the interim policy's transparency and compliance framework, the Senate committees caution that it represents only a baseline response to state audit requirements. For durable legitimacy and academic integrity, the policy must evolve beyond compliance toward affirming the Senate's constitutional authority over teaching, curriculum, and faculty governance, ensuring that commercial or logistical partnerships never supersede academic oversight.

Sincerely,



Matthew McCarthy, Chair
Academic Senate, Santa Cruz Division

Enc: Senate Committee Responses (Bundled)

cc: Amanda Rysling, Chair, Committee on Courses of Instruction
Tanner WouldGo, Chair, Committee on Educational Policy
Chad Saltikov, Chair, Graduate Council
Zac Zimmer, interim Chair, Committee on Information Technology
Megan Thomas, Chair, Committee on Teaching
Matthew Mednick, Executive Director, Academic Senate

November 3, 2025

MATT MCCARTHY, Chair
Academic Senate

RE: (Systemwide Senate Review) Presidential Interim Policy for UC's Use of Online Program Management Companies

Dear Matt,

The Committee on Courses of Instruction (CCI), reviewed the Systemwide Senate Presidential Interim Policy for UC's Use of Online Program Management Companies (OPMs) at their October 20th meeting and their November 3rd meeting. The committee notes that currently UCSC Extension uses two OPMs: Ziplines and Center for Legal Studies, which, to our knowledge, were not flagged in the audit.

As the committee with purview over main campus and UNEX course approval, CCI raised several questions regarding continued compliance. While CCI can request that units disclose the use of an OPMs at initial course approval by updating course forms to request this information, it may be difficult to monitor this in future. How will the move to OPM usage be documented or overseen if OPMs are only adopted well after a course has been approved? In the longer term, CCI wonders if a list of approved OPMs could be provided, much like the lists that now exist for accessible and secure technologies.

Overall, CCI supports continued attention to this matter as the online educational space continues to grow.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Rysling". The signature is fluid and cursive, with a large, stylized "A" and "R".

Amanda Rysling, Chair
Committee on Courses of Instruction

cc: Tanner WouldGo, Chair, Committee on Educational Policy
Yat Li, Chair, Committee on Faculty Welfare
Jerome Fiechter, Chair, Committee on Information Technology
Megan Thomas, Chair, Committee on Teaching

October 30, 2025

MATTHEW McCARTHY
Chair, Academic Senate

Re: Systemwide Presidential Interim Policy for UC's Use of Online Program Management (OPM) Companies

Dear Matt,

The Committee on Educational Policy (CEP) has reviewed the Interim Presidential Policy for the University of California's Use of Online Program Management (OPM) Companies. The committee noted that the policy is narrowly tailored toward implementing the minimum recommendations in the [California State Auditor's Report](#); thus, OPM use is primarily viewed as a compliance issue (e.g., ensuring instructor transparency, evaluation procedures, and incentive-based compensation). However, the policy does not clarify how Senate review and approval processes apply when OPMs provide instruction or instructional materials for *Senate-approved courses*.

As a result, the committee would like to draw attention to the following Systemwide Regulations that grant Senate authority regarding instructors, courses, and curriculum. These regulations already establish guidelines on who may teach and under what conditions:

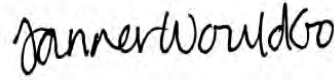
- SR 750.A states that “[o]nly regularly appointed officers of instruction holding appropriate instructional titles may have substantial responsibility for the content and conduct” courses approved by the Academic Senate.
- SR 800.A requires that all University Extension courses yielding credit toward an academic degree or a professional credential or certificate must be taught by a member of a University department in which instruction is offered or (depending on the course number) approved by the Committee on Courses of Instruction in consultation with the relevant department or approved by the relevant department.

Together, these provisions make it clear that the delegation of instructional design and delivery to non-UC Santa Cruz faculty or OPMs is highly restricted, and, in most cases, in violation of Senate regulations. This extends to University Extension courses, which are in the Senate's purview.

Further, the interim policy does not offer clear distinctions between instructional and non-instructional OPM activities. For instance, "OPM" can refer to a wide range of activities – recruitment, marketing, course design, instruction. Conflating these activities under one classification confuses contractual compliance with academic oversight, which risks obscuring Senate purview. Without clear distinctions, the policy may permit the outsourcing of curricular design and instruction, which falls within Senate purview.

Moving forward, CEP emphasizes that **active** Senate involvement is necessary to provide adequate oversight of OPM company use, on this campus and at [Silicon Valley University Extension](#).

Sincerely,

A handwritten signature in black ink that reads "Tanner WouldGo". The signature is written in a cursive, slightly slanted style.

Tanner WouldGo, Chair
Committee on Educational Policy

cc: Amanda Rysling, Chair, Committee on Courses of Instruction
Megan Thomas, Chair, Committee on Teaching
Jerome Fiechter, Chair, Committee on Information Technology
Chad Saltikov, Chair, Graduate Council

November 3, 2025

MATTHEW MCCARTHY
Chair, Academic Senate

Re: Systemwide Review – Presidential Interim Policy for the University of California’s Use of Online Program Management Companies

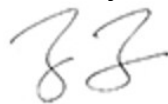
Dear Matt,

During its meeting of October 22, 2025, the Committee on Information Technology (CIT) discussed the Presidential Interim Policy for the University’s use of Online Program Management (OPM) Companies. CIT understands that currently UC Santa Cruz (UCSC) only rarely engages OPM companies, although we understand that the campus does have a partnership with Coursera, a Massive Open Online Course (MOOC) provider, which is considered an OPM under the definition of the CA state audit report.¹ We appreciate AVP for Educational Innovation Tassio's caution that OPMs are "notorious for being profit driven and having practices that often result in low student retention."² In that spirit, CIT supports the interim policy's focus on transparency and the prohibition of incentive-based compensation. Given the negligible presence of OPM contracts on UCSC's campus at the current moment, we feel comfortable endorsing this interim policy, and are supportive of the efforts to prevent the distortion or dilution of UC-branded course content through undisclosed OPM partnerships. However, the committee raised some associated concerns regarding the use of third-party providers to manage online courses that are not included in the policy.

For context in our review discussion, CIT considered the campus partnership with Coursera, which raised some additional issues not covered in the Interim Policy. Members shared concerns that, in the current budget environment, Coursera partnerships (or similar third-party partnerships) might be encouraged as a potential source of revenue generation, but have the potential to generate revenue for the original course creator, while providing very little financial incentive to departments to offer these courses. Members raised concerns that UCSC instructors of online courses might additionally turn to third-party providers to provide specific services (exam proctoring, AI plagiarism detection, etc.) that are not covered in Section C.3.b. "Covered Activities". CIT understands that the Interim Policy is addressed mainly to OPMs involved in student recruitment and enrollment, but it seems relevant that these kinds of third-party partnerships should also be disclosed as "External Instructional Partnerships".

Thank you for the opportunity to opine.

Sincerely,



Zac Zimmer, Chair *pro tem*
Committee on Information Technology

¹ AVP Tassio to Senate Analyst Hurdis, 9/02/25, Re: Question about UCSC and OPMs

² *ibid.*

cc: Jean Fox Tree, Chair, Committee on Career Advising
Tanner WouldGo, Chair, Committee on Educational Policy
Yat Li, Chair, Committee on Faculty Welfare
Megan Thomas, Chair, Committee on Teaching
Chad Saltikov, Chair, Graduate Council

November 3, 2025

MATTHEW MCCARTHY
Chair, Academic Senate

**Re: Systemwide Review of Presidential Interim Policy for the University of California's
Use of Online Program Management Companies**

Dear Matt,

The Committee on Teaching (COT) has reviewed the new proposed Systemwide Presidential Interim Policy for the University of California's Use of Online Program Management (OPM) Companies. The review of this policy has raised a lot of questions from our committee regarding the use and impacts of OPM companies on our own campus, as well as UC extension (UNEX), which we urge the Senate to seek clarification on. We are certain, however, of the Senate's authority over course offerings and curriculum.

COT would first like to note the discrepancy between the [State Audit Report](#) and the interim OPM policy and whether or Coursera is considered an OPM in the proposed policy. We are uncertain if Coursera is considered an OPM and therefore falls under the purview of the Interim OPM policy. We seek clarification both at the divisional and systemwide levels. COT has the understanding that UC Santa Cruz has a contract with Coursera which offers some UCSC online course content but only in non-credit bearing format.

To date, we are not aware that any "external instructor[s] hired by an OPM company" have taught Coursera UCSC or any other UC Santa Cruz courses, though we are uncertain of the status of UNEX courses. COT would like to express general concern that the Interim OPM Policy outlines an evaluation process for external instructors hired by an OPM company that does not clearly fall within the campus' Senate policies and practices for course evaluation. Any courses offered for UC credit must follow Senate processes.

The process of evaluation for courses managed by OPM companies, as outlined within the policy, brings forth a broader question about the relationship between OPMs and UCs. More specifically, we would like further explanation of the policy's implications for the purview of the UC's self governing entities such as APM and CAPM, as well as the Senate bylaws and how they might extend to cover (or not) UC courses with external instructors of OPM companies. We further wonder how it could be that a UC course would be taught with an instructor that was not appointed by UC, which the policy would seem to normalize.

Finally, with regards to the policy on soliciting prospective students, which is prohibited, the COT did not entirely understand the purpose of allowing the collection of contact information if solicitation was not allowed under the policy. The COT would like clarity on the purpose of collection and use of such contact information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Thomas', written in a cursive style.

Megan Thomas, Chair
Committee on Teaching

cc: Amanda Rysling, Chair, Committee on Courses of Instruction
Tanner WouldGo, Chair, Committee on Educational Policy
Yat Li, Chair, Committee on Faculty Welfare
Jerome Fiechter, Chair, Committee on Information Technology

October 29, 2025

MATTHEW McCARTHY
Chair, Academic Senate

Re: Systemwide Review of Presidential Interim Policy for UC's Use of Online Program Management Companies

Dear Matt,

At its meeting of October 23, 2025, Graduate Council (GC) reviewed the interim policy on UC's use of Online Program Management Companies (OPMs).

GC welcomes the effort to create this interim policy which gives clearer guidelines to enforce transparency and protect students in programs that involve OPMs. The new policy was especially necessary to protect graduate students, since parts of previous UCOP guidelines seem to have applied only to undergraduate programs, despite the fact that all of the currently existing programs using OPM companies are master's programs or continuing education programs provided through university extension units (according to the California State Auditor's report 2023-106).

GC finds that the interim policy adequately addresses the points raised and follows the recommendations made in the state audit. However, we do recommend that students be granted more lenient withdrawal and refund rules if a course is managed by an OPM.

Sincerely,



Chad Saltikov, Chair
Graduate Council

cc: Jerome Fiechter, Chair, Committee Information Technology
Yat Li, Chair, Committee on Faculty Welfare
Amanda Rysling, Chair, Committee on Courses of Instruction
Megan Thomas, Chair, Committee on Teaching
Tanner WouldGo, Chair, Committee on Educational Policy
Matthew Mednick, Executive Director, Academic Senate



UNIVERSITY
OF
CALIFORNIA

Academic Senate

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UNIVERSITY COMMITTEE ON EDUCATIONAL POLICY (UCEP)

Catherine Sugar, Chair

csugar@ucla.edu

November 12, 2025

Ahmet Palazoglu

Chair, UC Academic Council

RE: UCEP Response to the Presidential Interim Policy for the University of California's Use of Online Program Management Companies

Dear Ahmet,

The University Committee on Educational Policy (UCEP) discussed the **Presidential Interim Policy for the University of California's Use of Online Program Management Companies** at its meeting on November 3rd. The proposed policy addresses recommendations directed to UCOP by the California State Auditor around the use of Online Program Management Companies (OPMs). The crux of the policy is to ensure that students enrolling in courses taught by non-UC persons, employed by Online Program Management Companies (OPMs), are aware of the affiliation and credentials of the instructor(s) before enrolling in the course. Some OPMs offer financial incentives by enrollment, which UC will prohibit. Additionally, alternate student assessments may be used, interaction expectations may be different, and appeals processes may vary. Accreditation of affiliates, and how to work with non-accredited entities, are also noted.

OPMs are currently primarily used in conjunction with Graduate and/or Extension courses and the proposal represents a tailored response to a state audit and its findings, so the interim policy does not fall directly under UCEP's mandate. However, OPMs may become far more relevant to undergraduate instruction as use of online courses and programs expand. UCEP therefore provides general comments intended to clarify the language of the policy and inform considerations around implementation to ensure it is as broadly applicable as possible going forward.

CAMPUSES

Berkeley
Davis
Irvine
UCLA
Merced
Riverside
San Diego
San Francisco
Santa Barbara
Santa Cruz

MEDICAL CENTERS

Davis
Irvine
UCLA
San Diego
San Francisco

NATIONAL LABORATORIES

Lawrence Berkeley
Lawrence Livermore
Los Alamos

One area relevant to OPM management concerns the established UC processes for faculty hiring governed by Senate Regulations 750A and 800A, which outline how the University approves instructors to teach courses. While the interim policy addresses faculty hired to teach courses offered through OPMs, continued growth in such offerings—particularly through University Extension—underscores the need for clear guidelines aligned with Senate regulations. The UC system already maintains instructional pathways independent of OPMs yet hiring practices within Extension programs can vary significantly by campus. Transparent vetting and disclosure procedures are in place for instructor appointments, but an increase in hiring activity may warrant additional attention to oversight at both the institutional and divisional levels.

UCEP also wishes to call attention to the inconsistent use of nomenclature throughout the proposed document. The policy alternately references “all courses listed on UC websites,” “all programs that use OPMs,” and similar phrases, which shift the scope of application and create potential ambiguity. Such variations raise questions about the intended distinctions among these categories and, for example, what it specifically means for a course to be “listed on a website.” In addition, the document appears to conflate the terms “division,” “school,” and “extension,” which represent distinct entities within the UC system and would benefit from clearer differentiation. UCEP therefore recommends aligning and clarifying terminology to ensure continuity and consistency across the policy.

Building on these observations, UCEP recognizes that the interim policy substantively addresses several key areas of oversight and accountability related to OPM-managed courses. The policy’s strengths and limitations can be seen in the specific provisions it includes and those it omits with respect to faculty affiliation, student support, course evaluation, and compliance with accreditation standards. The following summary outlines areas the policy addresses effectively, as well as those that may warrant further clarification or future attention. The committee recognizes that some of these go beyond the specific framing imposed by the response to the state audit and may be handled through accompanying implementation recommendations rather than in the policy itself.

Overall, UCEP feels the policy does a good job of addressing the following:

- Ensuring transparency around the qualifications of any faculty teaching courses run through OPM services who are not otherwise affiliated with the University (A, 3. a., b., e.)
- Clearly identifying University contacts for assistance while enrolled in a course offered by an OPM service, especially one for which faculty

teaching the course are not otherwise affiliated with the University (A. 3. d.)

- Mandating reporting of data related to the areas outlined in the policy (A. 4.)
- Requiring course-specific evaluations of content and delivery, as well as the effectiveness of the instructor, to promote an iterative process informing curricular development and teaching quality (B. 1. and 3. a. i. and ii.).
- Preventing OPMs, and faculty associated with courses offered by them, from incentivizing student enrollment for compensation on the part of individuals or entities engaged in recruitment (C. 1. & 3. a., b.)
- Holding OPMs to WASC and Federal standards for operation (3. C. – WASC & 3. D)

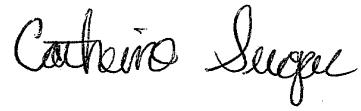
Areas that are not addressed by the policy, but which could create some uncertainty or lack of oversight related to OPM-managed online courses include the following:

- Ownership of course content and the intellectual rights to content generated by University or external faculty for OPM-managed courses
- Consistent, rigorous Senate oversight of course approval, curricular review and hiring of instructors for OPM-managed courses.
- Senate oversight of changes to curricula resulting from course evaluations
- Larger-scale review (akin to the APR process) for OPM-managed courses or programs, if warranted (note that the WASC material attached refers to nonaccredited entities) (D. 1.; D. 3.)
- Inclusion in student evaluations of online instruction items that specifically ask whether the modality support was adequate.
- Use of additional, more robust means of course and program review beyond student evaluations, such as a peer review

UCEP appreciates the opportunity to review the interim policy and recognizes its attention to the state audit. While OPMs are not currently in use for undergraduate programs, the committee's review provides overall insight into the importance of consistent terminology, alignment with or further consideration of existing Senate regulations governing faculty hiring, and clear distinctions among divisions, schools, and University Extension. UCEP also notes the policy's strengths in addressing disclosure, student support, evaluation, and compliance requirements, while identifying areas for continued clarification related to course ownership and review processes for OPM-managed courses.

Please contact me should you have any questions.

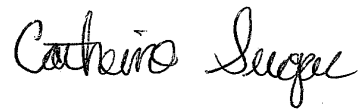
Sincerely,

A handwritten signature in black ink, reading "Catherine Sugar". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Catherine Sugar, Chair
UCEP

UCEP appreciates your consideration. Please contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, reading "Catherine Sugar". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Catherine Sugar, Chair
UCEP



UNIVERSITY
OF
CALIFORNIA

Academic Senate

Office of the President
1111 Franklin Street
Oakland, CA 94607

senate.universityofcalifornia.edu

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UNIVERSITY COMMITTEE ON FACULTY WELFARE
KAREN BALES, CHAIR

November 10, 2025

AHMET PALAZOGLU
CHAIR, ACADEMIC COUNCIL

RE: Presidential Interim Policy for the University of California's Use of
Online Program Management Companies

Dear Chair Palazoglu,

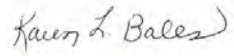
The University Committee on Faculty Welfare (UCFW) has discussed the
Presidential Interim Policy for the University of California's Use of Online
Program Management Companies (OPMs).

While we have no concerns with the policy itself – indeed, we applaud the
prohibition of incentive payments, we wonder about the direction of
education and faculty recruitment and retention should use of these
companies become widespread. The faculty should not cede curricular
authority, especially at this point and time, when program restructuring and
resizing are under active consideration. It is foreseeable that faculty
intellectual property could be jeopardized. Reliance on OPMs could further
erode the faculty ranks by presenting a cheaper payroll alternative.

Policy implementation guidelines should specify who can enter into these
contracts and after what level of Senate review of academic
considerations. Future policy iterations might usefully cap the number of
OPM courses allowable by department or other unit.

We look forward to advancing our shared goals.

Sincerely,

A handwritten signature in black ink that reads "Karen L. Bales". The signature is written in a cursive style with a large, stylized 'K' and 'B'.

Karen Bales

Cc: Academic Council Vice Chair Ahmet Palazoglu
Senate Executive Director Monica Lin
UCFW Members