



Bill Jacob
Telephone: (510) 987-9303
Fax: (510) 763-0309
Email: William.jacob@ucop.edu

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

July 30, 2014

AIMÉE DORR
PROVOST AND EXECUTIVE VICE PRESIDENT
UNIVERSITY OF CALIFORNIA

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

Dear Aimée,

The Academic Council discussed the [latest revisions](#) to the draft policy on Self-Supporting Graduate Professional Degree Programs (SSGPDPs) at its July 23 meeting. Council appreciates your staff's efforts to revise the proposed policy based on the [feedback](#) we sent you in February.

Detailed comments based upon written reviews are provided below, but first I would like to communicate the tenor of the Academic Council conversation in which the discussion considered the situation more holistically. Although Council ultimately endorsed the proposed revisions to the policy, it did so despite serious misgivings that the proliferation of self-supporting programs (SSPs) risks undermining core academic programs and raising barriers to access to professional degree programs. These concerns crystallized around a critique of the absence of criteria for what constitutes a "compelling case" why a program cannot or should not be offered with state support. Council's acquiescence to promulgation of the revised policy rests on the understanding that the Coordinating Committee on Graduate Affairs (CCGA) will carefully document its reasons for finding that a compelling case has been made for each SSGPDP that it approves. Over time, Council will rely on CCGA to derive principles and criteria from these case-by-case evaluations and codify them in its Handbook and other documents. CCGA has recently, in its June 2014 revision of its Handbook, added clarifying details to the instructions to proposers of new degrees; many of these additions are designed to elicit the information needed to evaluate SSGPDP proposals. CCGA will issue further guidance once the new policy is promulgated.

Council recognizes that the recent history of granting exceptions to policy in order to approve SSPs requires a more flexible policy but is concerned that the ambiguities inherent in this version have the potential to generate continued controversy. It is our hope that more explicit guidelines from CCGA can offer sufficient clarity to make the policy workable so long as the President's views are compatible with those of CCGA. While I cannot predict how long it will take for CCGA to formulate guidelines derived from its case-by-case evaluations, it has the blessings of Council to prepare them and bring them back at a future date. I anticipate that CCGA's guidelines will address

some of the specific concerns raised by the Senate in this review and will clarify why conversions from PDSTs should be rare.

On the whole, Academic Senate reviewers expressed many of the same concerns as in the past, as was reflected in the Council discussion, where I heard the refrain I have often heard the past four months; that if “simply making money is sufficient for a compelling case” then all is lost. Council members and their constituencies believe that the expansion of SSGPDPs threatens the public nature of the university and its relationship to state funding, that SSGPDPs may divert resources away from UC’s core academic mission and further privatize UC, and that the self-supporting model represents a fundamental shift away from the university’s responsibility to remain accessible to all segments of society. Closely linked are concerns about overload teaching, how it is defined and who pays for what, and about the potential of SSGPDPs to compromise the publicly funded responsibilities of units where they are housed. Another general concern raised in Council was how the Presidential policy would interact with existing campus-level policies and rules governing SSPs. Could the vagueness of the Presidential Policy serve to weaken divisional and campus policies? We hope that it will be made clear that any proposed new or conversion to an SSGPDP must meet divisional criteria before being considered by CCGA or the President.

Some of the divisional reviews contain positive commentary. Several reviewers noted that the revisions improve the earlier policy substantially, incorporate helpful clarifications, and adequately address concerns raised in the previous review. Several reviewers expressed satisfaction that the new revisions provide more effective guidelines for creating an SSGPDP, converting a state-supported program to an SSGPDP, and distinguishing SSGPDPs from state-supported programs that charge Professional Degree Supplemental Tuition (PDST). Several reviewers also noted that SSGPDPs have the potential to generate additional revenue that can help support state-supported academic programs in individual departments as well as the overall scholarly capacity of the campus. They noted that it is important for UC to have an effective SSGPDP policy in light of declining state funding and growing interest in the SSGPDP model.

In sum, the Academic Council offers our measured (and reluctant) support for the revised policy premised on the expectation that the recommendations outlined below will be incorporated into the final policy document to the greatest extent possible. Guidelines developed by CCGA to indicate its expectations for approval will also serve to clarify some ambiguities in the policy.

Definition of an SSGPDP and “Compelling” Case

In February, Council requested that the policy be revised to include academic criteria for establishing SSGPDPs and principles to help distinguish SSGPDPs from state-supported programs that charge PDST. The revised draft includes language defining SSGPDPs as academic programs that “primarily serve professionals seeking to advance their careers” and requiring campus units proposing an SSGPDP to make a “compelling case” for why the program cannot or should not be state-supported and to provide assurances that the SSGPDP will not have a “detrimental impact” on the department’s state-supported mission.

Council finds this language to be a positive addition to the policy to the extent that it helps ensure, as UCPB notes in its letter, that proposals for new SSGPDP programs and conversions will be closely scrutinized and that it requires that any detrimental impact on a department’s regular programs and responsibilities be minimized or mitigated. However, Council also notes that the vagueness of the language invites many possible interpretations. Although this flexibility accounts for a broad range of existing local policies and allows campuses a high degree of flexibility to establish new SSGPDPs

and to define individual local policies for SSGPDP programs, it also sets up potential conflicts between departments on a campus and between campuses and CCGA. (Some departments will inevitably view the potential to generate revenue alone to be a sufficiently compelling case for a new SSGPDP.)

In its letter, CCGA agrees that the term “compelling case” is vague but believes the vagueness is unavoidable and appropriate; it says a case-by-case judgment is required and is appropriately vested in the Academic Senate. Council agrees, and notes that campus Graduate Councils will be looking to CCGA for guidance about what makes the case for a new or converted SSGPDP “compelling.” Council agrees that CCGA needs to make clear, case-by-case statements about what makes each (approved) case “compelling” and has asked CCGA to produce a document that offers guidance to the divisions about what it considers to be a compelling justification for an SSGPDP.

Finally, several reviewers found the notion that SSGPDPs are a “necessary” educational strategy to be problematic and potentially confusing. We suggest that the word “necessary” be removed from the text to indicate that SSGDPs are simply “an educational strategy.”

Financial Accessibly and Diversity

In February, Council expressed strong concerns about the financial accessibility of SSGPDPs and requested that the policy include language requiring SSGPDPs to have clear accessibility and diversity plans that include regular monitoring of student diversity. It appears, however, that little or nothing has been added to the revised policy to address this request.

Council believes the policy needs a more strongly worded commitment to access, affordability, and equal opportunity in SSGPDPs. The policy states that SSGPDPs should be accessible to a “wide range of income levels,” but it needs a statement regarding the diversity of the student population, in the context of underrepresented groups and gender, and additional guidance about monitoring financial accessibility. In its letter, UCSD suggests that the policy encourage campuses to develop diversity and access plans that are tailored to the needs of the local community and the specific program, and UCSC suggests there may be a return-to-aid model that could work with an SSGPDP fee structure. Similarly, CCGA is concerned that providing equal access for a broad spectrum of students will be increasingly difficult as more SSGPDPs are brought online. In 2008, CCGA developed a set of data that it recommended each program be required to acquire and report in order to track access, affordability, and diversity. Details and principles for access were articulated in a November 2008 paper¹ that was forwarded by the Academic Council to the President at that time and is attached for your reference. CCGA requests that these data be reported annually to the President and shared annually with the Senate to help reviewers understand the big picture and evaluate whether approved programs are working as expected.

Effect on Faculty Workload and Other Programs

Several reviewers reiterated concerns the Senate expressed in January about the potential for SSGPDPs to divert resources and faculty effort away from core state-supported undergraduate and graduate programs. These concerns are now addressed to some degree in the new language in Policy Text section A, requiring reviewers to make a compelling case that the proposed SSGPDP will not have “detrimental impacts” on the department’s state-supported mission. On the other hand, the

¹ Self-Supporting Graduate Degree Programs and Policy at the University of California: Background Paper: Prepared for the Coordinating Committee on Graduate Affairs by Academic Affairs, University of California Office of the President, November 2008.

policy allows for teaching a SSGPDP course on either an “overload” or a “buy-out” basis, but does not define “overload” teaching specifically. We note that what constitutes “overload” differs vastly from department to department and discipline to discipline. (The normal course load could be three courses in one department but four in another.) Council believes the policy or implementation document should be more specific about “overload teaching” to help prevent course load inequities.

Moreover, and as CCGA notes in its letter, we caution that using overload teaching or buy-outs to provide instruction in an SSGPDP both carry potentially negative effects for quality. Overload teaching could affect a faculty member’s research productivity, impede her commitment to state-supported teaching, and reduce her availability for advising and mentoring students in regular academic programs. Buy-outs may result in diversion of ladder rank faculty teaching to SSGPDPs while the salary savings support lecturers for state-supported programs rather than additional faculty lines. We expect campus graduate councils and CCGA to monitor these concerns and effects as they review proposals.

As UCD and CCGA note, the section of the policy covering the initiation and approval of SSGPDPs (section III, part H.1) limits the consideration of detrimental impacts to the “unit proposing the program,” but campus reviewers and CCGA should take a wider view of the detrimental impacts any SSGPDP proposal may have on any state-supported teaching, research or service across the affected campus.

Finally, Council requests further clarification about Section F of the Policy Text, which states “...the nature of certain practice oriented degree programs may warrant a higher proportion than usual of non-ladder faculty.” It is not obvious why SSGPDPs in particular would justify an expansion of non-ladder faculty staffing of courses. There is also concern that the provision allowing for a higher proportion of non-Senate faculty instructors for “certain practice-oriented degree programs” is open to broad interpretation and could be exploited. Based on the definition in section III, part B as “graduate programs that primarily serve professionals seeking to advance their careers.” all SSGPDPs could potentially justify a higher proportion of non-Senate faculty instructors. (UCD)

Monitoring Financial Impacts

Council believes it will be vitally important to track the academic and financial performance of SSGPDPs and their broader impact on UC, considering the large number of programs in the pipeline. We are concerned that too much growth could create financial imbalances across disciplines on a campus or across campuses, with disproportionate benefit to departments and campuses that have more opportunity to market them. Council requests as much transparency as possible with regard to fiscal reporting. Specifically, we would like a report on the current status of each of the listed 56 existing SSGPDPs, with periodic updates on their general financial viability. The assumption that SSGPDPs bring in reliable streams of revenue may, in the end, not be supported by actual experience. The University should expect some of these programs to fail and ensure that the policy addresses failures and associated liabilities such as debt and accommodating students-in-progress. The policy also needs to be clearer in addressing conversion back to state support.

Several other issues arose during the systemwide review that we believe are worth mentioning:

Other Issues

- For purposes of consultation, the definition of program “stakeholders” should include not only students and faculty associated with the program, but also education experts and administrators who focus on questions of access and inclusion (financial and otherwise). (UCSD)

- Clarify in Policy Text Section C that all academic doctoral degrees are ineligible. (UCSB)
- Language prohibiting the use of disallowed funds for phase-in period costs should be added to the policy, or, if it is the intent that this be allowed, the duration and level of support should be specified (UCSD).
- CCGA has asked that the Academic Planning Council consider the Master of Advanced Study title (M.A.S.) for SSGPDPs and issue a statement clarifying the use of M.A.S. and the nature of this degree.
- There should be a provision for a *systemwide* review of conversions from SSGPDP back to state-supported status. Deletion of the word “campus” before “approvals” would resolve this issue.

The Academic Council thanks you again for the opportunity to opine.

Sincerely,



Bill Jacob

Encl. (1)

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