March 31, 2015

André Knosen, Chair  
Davis Division of the Academic Senate

Re: Request from Council of Associate Deans regarding Splitting Units in GE3

Dear Chair Knosen,

Thank you for your question about splitting units between the “writing experience” and “oral skills or writing experience” parts of the “Literacy with Words and Images” Core Literacy. We advise that units from the same course can be split between the two parts of the Core Literacy under the regulations as they stand, but we also request that the Committee on General Education of Undergraduate Council consider the issue explicitly and clarify the relevant regulations and website materials.

By way of background, Davis Division Regulation (DDR) 522 provides that baccalaureate degree candidates must satisfy a General Education requirement that has two components: Topical Breadth and Core Literacies.1 The Core Literacies component has four parts, one of which is Literacy with Words and Images.2 Literacy with Words and Images, in turn, requires “6 units of designated writing experience coursework in the candidate’s major or elsewhere,” (the “six-unit requirement”) and “3 units of additional designated coursework in either oral skills or writing experience” (the “three-unit requirement”).3

You asked whether a student with eight units of writing experience coursework could use six of the eight units to satisfy the “writing experience” component and count the remaining two units toward the “oral skills or writing experience” component. We understand the question to be whether units from a single course can be applied to both parts. We are not aware that anyone has relied significantly on one interpretation rather than another, or that adopting either interpretation would create practical problems.

You advised us that the Chair of the Committee on Courses of Instruction (COCI) had taken the position that units could be split this way, and we note that CERJ has given weight in the past to the COCI Chair’s interpretation of General Education regulations.4

Apparently students may satisfy the three-unit requirement by taking writing skills courses only and need not take any oral skills courses.5 The Regulation’s text permits the three units to be in “oral skills or writing experience.”6 The document on the General Education website titled “GE Oral Skills – Course Approval Description,”7 supports our interpretation: it provides, “Oral Skills coursework is an option for 3 units” of the Literacy with Words and Images requirement.8

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1 DDR 522(A).
2 DDR 522(C).
3 DDR 522(C)(1).
4 See CERJ Advice, General Education Topical Breadth Courses, Oct. 10, 2011 (citing COCI Chair’s interpretation of DDR 523 in addressing whether courses must be assigned to GE topical breadth requirements).
5 Indeed, at least one member of our committee understands that all undergraduate students would not be able to complete the three-unit requirement with three units of oral skills courses given what is currently offered on campus.
6 DDR 522(C)(1) (emphasis added).
8 Id. (emphasis added). The reference to “3 units of additional designated coursework in either oral skills or writing experience” could possibly be interpreted to mean “exactly three units of oral skills work, or exactly three units of additional writing experience work, but not any other combination, such as two units of oral skills and one unit of writing experience” but this interpretation seems pointlessly rigid. We see no reason for forcing students to choose between three or zero with no middle ground.
Thus, there does not seem to be any question that the three-unit requirement can be fulfilled with writing-skills courses. The question is whether units from the same course can be “split,” for example, if two units of a four-unit writing skills course can be counted toward the six-unit requirement and two units counted toward the three-unit requirement. Even if students are not required to take any oral skills courses to fulfill the three-unit requirement, it does not necessarily follow that students may split units from a single course between the six-unit requirement and the three-unit requirement.

The structure of the regulations suggests that they permit splitting units from a single course. The last major revision of the GE regulations switched from a course-based to a unit-based requirement, suggesting an emphasis on the number of units for each requirement, not the number of courses in which they are taken. More specifically, although the regulations apparently expressly forbid splitting units across Topical Breadth areas and across Core Literacies, there is no corresponding prohibition on splitting units within a Core Literacy. That suggests that there is no prohibition on splitting within a Core Literacy.

Even if there were some reason that courses cannot be split within a Core Literacy, there is particularly little reason to prohibit splitting between the six-unit and three-unit requirements. Because the three-unit requirement can be satisfied entirely with writing experience courses, it seems to be functionally a subpart of an overall nine-unit requirement. This relationship between the six-unit and three-unit requirements appears to be unique in General Education.

Despite these reasons for allowing unit-splitting in the situation you asked about, the matter is not entirely free of ambiguity. Neither the regulation nor the associated rationale offers an explicit justification for allowing unit-splitting between areas within a Core Literacy but not between Core Literacies. Moreover, some UC Davis materials treat or seem to treat Oral Literacy as a separate Core Literacy and may cause confusion. The General Education Core Literacies webpage lists “Oral Literacy” (and not “Oral Literacy or Additional Writing Experience”) as a Core Literacy.

Likewise, the UC Davis General Catalog webpage on the General Education requirement states, “In the case of a course that has been certified in more than one Core Literacy Area, a student may count the units of the course in only one of the core literacy areas in which it has been certified.” Despite the use of capital letters, “Core Literacy Area” does not appear to be defined on the page. The page presents “Writing experience coursework” and “Oral skills coursework or additional writing experience coursework” under separate headings. Thus, the catalog page could be read to say that “writing experience coursework” and “oral skills coursework or additional writing experience coursework” are two different “Core Literacy Areas” and that units may not be split between them.

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9 [Link](http://ge.ucdavis.edu/local_resources/docs/GE-requirement-June08-final.pdf) (“The GE requirement is defined in terms of units, not courses.”).
10 See DDR 522(D)(2) (“No course may be counted by a student toward the satisfaction of more than one of the four Core Literacies.”). A student apparently may not, for example, use a single four-unit course that qualifies for the Topical Breadth requirement in both Arts and Humanities and Social Sciences to satisfy two units of Arts and Humanities and two units of Social Sciences.
11 DDR 522(D)(3) (“No course may be counted by a student toward the satisfaction of more than one of the four Core Literacies.”). If a student were to take a course that satisfied both American Cultures, Governance, and History (Civic and Cultural Core Literacy) and Writing Experience (Literacy with Word and Images Core Literacy), she apparently would not be able to use the course to satisfy two units of American Cultures, Governance and History and two units of Writing Experience.
12 The official rationale for the change to the current GE system in 2008 refers to “[c]onversion to a unit-based requirement,” and notes that the switch “allows 1-2 unit courses … to qualify for GE credit” and “will also let the GE program work better for students whose majors have heavy unit loads.” Proposed Revision of Davis Division Regulations 522-524: General Education Requirement, Submitted by the Undergraduate Council, at 2. The Rationale does not, however, address unit-splitting directly.
13 [Link](http://ge.ucdavis.edu/course-approval-descriptions.htm).
14 [Link](http://catalog.ucdavis.edu/ugraded/gereqt.html).
In sum, based on the structure of the regulation and the views of the COCI Chair, we conclude that the better interpretation of the regulation is that units from the same course can be used to satisfy the six-unit and the three-unit requirement. Although the General Education Core Literacies webpage and the UC Davis General Catalog site seem ambiguous, the regulations are the controlling authority.

Nevertheless, because there is some ambiguity in the existing materials, we request that the Undergraduate Council Committee on General Education revisit the issue and clarify its intention. One possible approach would be to add a new subsection to Regulation 522 between 522(D)(3) and 522(D)(4) providing, “Units from a single course may be split and used to satisfy different parts of a single Core Literacy.” Or the Committee might decide to allow unit-splitting only between writing experience and oral skills, or in some other narrower set of circumstances.

We are available to consult on language if desired. We also suggest revising the GE and catalog websites so they clearly conform to the Regulations.

Sincerely,

John Hunt, Chair
Committee on Elections, Rules and Jurisdiction

Cc: Gina Anderson, Executive Director, Davis Division of the Academic Senate