Davis Division Academic Senate

Request for Consultation Responses

Systemwide Review: Policy on Self-Supporting Part-Time Graduate Professional Degree Programs

January 10, 2011

Provost Pitts has requested Senate advice on a proposed revision of the 1996 Policy on Self-Supporting Part-Time Graduate Professional Degree Programs and its Implementation Guidelines. Since 1996 there has been an increase in self-supporting graduate degree programs and, as you know, the Commission on the Future recommended further expansion of these programs as a potential source of revenue for the University.
I have consulted with the GSM executive committee, and we have no suggested changes or edit.
Elections, Rules & Jurisdiction

January 4, 2011 2:23 PM

CERJ has reviewed the policy on self-supporting part-time graduate professional degree programs and recommends the following changes:

Page 4. Delete comma after 'campuses' in item 1.

Page 8. Remove 'Note that' from item 7.

Page 9. change 'should' to 'must' under 'Program Approval' to make it consistent with 'shall.'

Page 10: reference of 'the same cost analysis is unclear. Suggest 'the same cost analysis as for existing programs.'
Graduate Council

January 10, 2011 10:22 AM

Graduate Council has reviewed the proposed revisions to the Policy on Self-Supporting Graduate Programs (SSPs) and has identified many issues that need to be resolved prior to it being an effective policy.

**Importance:** SSPs are proliferating even while this policy revision is under discussion. They are perceived as a means of obtaining resources for graduate education without raising fees in a time of declining state revenues. *There are a number of potential implications for UC and its mission of expanding SSPs as a means of expanding graduate education.* At the broadest policy level, SSPs can be interpreted as a major step towards the privatization of the university. They are associated with a reallocation of resources within the university. At the extreme end of the spectrum, one could envision a degree-granting unit removing itself entirely from the current financial structure and becoming an independent unit.

*The absence of clear objectives in this proposed policy raises serious questions and concerns.* Due to the importance of this policy, it is essential that clearly articulated objectives of SSPs are included. What are the reasons for developing SSPs? Are they intended to be self-supporting or revenue-generating? Are there particular outcomes by which each program shall be evaluated? Without concrete goals and evaluative measures articulated, SSPs could easily lead to a “pay for degree” culture in the UC that would devalue UC diplomas and lead to the wholesale privatization of a UC education.

Historically, SSPs were conceptualized as programs designed to reach working adults; students outside the conventional UC student pool. SSPs were meant to be in “professional” fields, particularly ones where graduates’ earning potential would allow them to recover the cost of the higher fees. *The use of SSPs is uncomfortably broadened with this policy revision*, and concerns of Graduate Council can be grouped into four categories: the widening of the definition of SSPs, the treatment of access and affordability considerations, the relationship between SSPs and the host campus, and the role of UC Extension.

**1. Widening the definition of a SSP.**

The new draft definition of a SSP is so broad that any graduate program could be included. Criteria for SSPs are noted on pages 2-3 as:

A. General
   1. Self-supporting graduate degree programs should meet **one or more** of the following
      a. fulfill a demonstrated higher education and/or workforce need;
      b. serve a non-traditional population, such as full-time employees, mid-career professionals, international students, and/or students supported by their employer;
      c. be offered through an alternative mode of delivery, such as online instruction;
      d. be alternatively scheduled, such as during evenings and weekends.

Note that only one criterion of a list that includes “fulfill a demonstrated higher education and/or workforce need” must be met. Importantly, the only criterion that addresses the potential
competition between SSPs and campus programs is that a SSP should target non-traditional students. Graduate Council suggests a narrowing of the criteria for a SSP; this may be accomplished by insisting that multiple criteria from the list above must be met; such as, SSPs “must meet criteria a and b, and either c or d”. Graduate Council affirms that a SSP should be identified as a program that is directed toward a non-conventional student constituency and that offers an alternative mode of delivery.

Graduate Council also recommends that the policy and the programs be more accurately named; they should reflect both the intended audience and the attribute that makes it a unique program, as well as account for the fact that many SSPs are not truly self-supporting. For example: “Policy on Revenue-Generating, Working Professional, Alternative Delivery Degree Programs”. This would make clear that proposals must demonstrate that the new program meets all of these goals.

Additionally, the inclusion of “part time” in the policy may not accurately reflect the nature of the SSPs coming forward, such as the recently proposed UC Davis Master of Professional Accountancy program, which is self-supporting but also is a full-time program.

A related policy issue is differentiating between when a professional degree fee is appropriate and when a SSP is appropriate, as well as between either of those being appropriate and a conventional state-supported graduate program being appropriate. This policy document is an opportunity to provide clarification on this emerging issue; unfortunately, no clarification or guidance is provided for campus faculty and administration.

2. Access and affordability.

The draft proposal’s statement regarding financial aid does not propose to impose any requirements except an “articulated financial accessibility goal” and a “student financial support plan” for achieving that goal. This statement does not include any concrete requirements. Furthermore, while this statement may be appropriate for a proposal for a new SSP, there is no distinction made between a proposal and ongoing operations. In other words, there are no consequences for the SSP if the plan is ineffective in meeting its goal. These issues need to be addressed, and must include, at minimum, concrete requirements (i.e. a 5-10 year plan) that must be met.

Additionally, questions arise as to whether SSP students will be eligible to receive fellowships, TA placements (thereby funding), or other campus funding opportunities (travel grants, etc.). It is the position of Graduate Council that SSP students should not receive the types of funding that are available to students in regular state funded programs, since such support is an important element in making regular graduate education accessible and affordable.

Finally, questions arise as to what kind of “working professionals” can afford such a program—perhaps professionals in high-paying professions may be able to afford to enroll in a SSP, or will benefit from employer-paid tuition, but that will not be true in all fields. Will there be a decision made regarding which fields should be eligible to offer a SSP? On what criteria will the decision be based? This issue directly relates to need to define the objectives of SSP, and affirms the need that these issues need to be explored and defined in the policy.

3. Relationship with host campus. The heart of this concern is whether or not host campuses capture enough benefits from SSPs. The program costs must include support for capital expenses and the general campus mission, because SSPs benefit from the UC label, infrastructure and facilities.
Financial cost. The funds charged by the campus must be reflective of the UC graduate education label and bear the full costs associated with the SSP. An overhead/indirect cost charged by a campus for a SSP cannot be purely based “marginal cost” per student; it simply fails to capture the true overhead costs for graduate education. One dimension of true cost relates to oversight. The Academic Senate and Graduate Council have limited resources which should be increased in order to enable them to provide oversight of SSPs without neglecting other responsibilities. There is a similar question regarding resources for the Office of Graduate Studies. These questions are particularly important when SSPs are administered by UC Extension because oversight is more complex.

A slightly different financial concern is that the draft policy states that the campus will be responsible for any financial losses incurred by the program and provides no additional guidance. If these shortfalls are offset by using graduate education funds, then other graduate programs will bear the cost—this is unacceptable.

UCD may wish to address these concerns through specific requirements for overhead. Berkeley addresses the first concern by charging SSPs 15% of program revenue or the campus indirect cost per student, whichever is larger. An off-setting consideration is that such a requirement increases the cost of the program for the students enrolled. Another one is that by definition a self-supporting program should not be taxed to support other programs. Whatever strategy we use to address this issue, the real costs of the SSP, and the benefit SSPs receive from the UC brand and infrastructure, must be accounted for adequately. Again, this goes back to determining the real goal of SSPs—are they designed for community service (thereby truly self-supporting) or should they be revenue-generating?

Competition for faculty time and attention. Graduate Council is very much concerned about how SSPs will compete with academic graduate programs and other faculty responsibilities. The policy must include a clear directive that SSPs shall not be undertaken if they strain the resources of the department that sponsors them or have an adverse effect on regular academic programs on campus. SSPs will represent a real cost of scholarship to the campus—faculty productivity and engagement suffers. For example, some SSP proposals address teaching needs by having faculty teach SSP courses on a (compensated) overload basis. Most SSPs do not hire additional faculty who may contribute to the campus; they hire professionals in the field to teach specific courses. In any case, faculty hires are not on the rise, and are in many cases are shrinking. This policy must require SSPs to address this issue by providing funding for additional qualified full-time faculty for the campus; otherwise, the cost to scholarship will be great, and the students who graduate with UC degrees in these SSPs will be significantly less qualified than other UC graduates. Additionally, review of the personnel teaching in the programs is essential, whether they are professionals in the field or regular faculty teaching on overload. There needs to be explicit requirements in this policy on this issue. For this reason, it is important that policy explicitly address the allocation of faculty teaching effort across SSPs and state-supported programs.

Difference in financial benefits for sponsoring programs and campus as a whole. The conversion of a state-supported program, including one with a professional degree fee, into a SSP increases returns to the academic unit offering the program; this is an incentive by which many regular academic programs are seduced. However, any such conversions will reduce returns to the general campus, and to graduate education. The UCB graduate dean calculates a substantial decrease in overall returns to the campus; however, UCB has an overall cap on student numbers. The effect on UCD likely differs in magnitude, although the indication is probably the same. Increasing the amount that a SSP must pay campus could offset the incentives provided by the higher revenues to the unit offering the SSP.
Graduate Council will request that Dean Gibeling perform an analysis comparable to the UCB dean’s analysis regarding the financial effects to UCD of SSPs, PDF-charging programs, and all state-supported programs.

4. Role of UC Extension. The expansion of SSPs will quite likely involve University Extension. For this reason, it is important that the Academic Council clarify the expectations and level of oversight that will be required with such programs. Graduate Council suggests that the Academic Council at a system level investigate the success, administration, and financial arrangements for self-supporting programs that are being offered in cooperation with University Extension. On the Davis campus the following graduate programs are offered in collaboration with Extension: Forensic Science (MS), International Commercial Law (LLM), Master of Laws (LLM), and Maternal and Child Nutrition (MAS). Independent of a systemwide study, the Davis Division should launch their own investigation and may want to halt the approval of any expansion any such SSPs on campus until the investigation is completed.

Graduate Council is of the opinion that Extension should never be allowed to administer SSPs, as it is likely that a wedge will be created between Senate control of the curriculum, campus control of revenues from graduate education, and funding for administrative and Senate oversight activities. Council recommends that more controls be instituted limiting the role of Extension in graduate education, and restating the explicit oversight authority of Graduate Council in all such graduate course offerings, including any graduate programs for which Extension is a collaborative partner.

Graduate Council has concerns in three areas regarding the role of Extension in SSPs: the financial relationship between campus and Extension, the quality control and curriculum oversight of a program, and access and affordability for students.

Finances. Extension has an incentive to move into graduate education, which is motivated primarily by revenue, not scholarship. As Extension increases its involvement in administering new SSPs, it can capture returns historically gained by UC campuses.

There is also an incentive for UC Extension to increase its shares of program returns by, for example, increasing the number of Extension courses that can be used to satisfy SSP course requirements. One path to increased program returns is to declare Extension courses equivalent to on-campus courses; in most cases, this can be avoided easily through oversight of the Academic Senate, which controls curriculum. But when Extension is collaborating with a unit on campus and administers a SSP, oversight may get more complicated. For example, if an approved graduate course is offered via Extension, then how can it be treated as transfer credit? Following that argument, it is possible that eventually all courses in a graduate program may be solely taken through Extension. Graduate Council recommends that Academic Senate keep a watchful eye on any move towards subverting the 12 unit Extension transfer policy and from any declaration of equivalency regarding coursework.

Quality and curriculum. Although there are regulations regarding the review of programs and instructors, Graduate Council questions the extent to which these regulations are followed, and to which they are effective in evaluating Extension operations. In the case of Extension-offered coursework at the graduate level, Council is concerned about the quality of instruction and the level of independent Academic Senate oversight. There are regulations regarding the maximum amount of teaching faculty can do in Extension courses on top of their other responsibilities, but it is unclear how these regulations will apply in the case of an Extension-administered degree program. This needs to be clarified in the policy.

Access and affordability. The draft statement says that the fees for programs administered by Extension are exempt from review by OP. Others in OP say that this is not the case. We’ve sought
a clarification and have not yet received it. This is of great concern and should be clearly articulated in this policy. **Graduate Council is of the strong opinion that the Academic Senate must have the same oversight responsibilities for any program within the UC system that offers an UC sanctioned degree.**

Regarding quality and finances, the policy does not have a provision for cases where an academic unit offering a degree through SSPs transfers administration of the program to Extension. We suggest that policy prohibit such conversions. Alternatively, such a change must trigger Graduate Council review with the possibility of CCGA review.

**Final Concern: Race toward Privatization.**

SSPs may be considered “shadow programs” to other regular academic programs, where SSP students receive the same degree, but pay much more for far lesser training. SSPs can also not be allowed to become programs that can overlap with other regular academic programs, usurp them, and sidestep the oversight that regular programs receive. This policy presents no clear goals or criteria for SSPs, no concrete outcomes by which SSPs will be evaluated, and no requirements for oversight and financial obligations to campuses. This lack of clarity and requirements will only lead to the proliferation pay-for-diploma programs at UC, and while UC Extension may likely grow during this proliferation, UC will see “brand dilution” and serious cost to scholarship. Before any policy is approved, the UC must put considerable more thought into SSPs and flesh out fully their role in future of the university.
CPB considered the Policy on Self-Supporting Part-Time Graduate Professional Degree Programs at its December 16th meeting. Many of the concerns expressed at the meeting are well articulated in the Graduate Council memo dated 1/7/11. However, some other concerns did arise.

We wish, in particular, to focus on the policies that we believe should be adopted in order to ensure that a given SSP is truly self-supporting, in the sense that the campus is not providing implicit monetary support to the SSP. Indeed, it seems clear that these programs will result in significant costs to the campus that must be accounted for. A portion of these costs will be the same as those associated with research funded by external grants, as reflected in the traditional "overhead" rates. CPB feels that at the very least the "overhead" rate should be the same as what is charged to external grants that are "off campus" (currently 26%), assuming that all facilities etc. for the SSP are off campus. If the SSP operates on campus, then the minimum rate should be the same as what is charged to external grants that perform research "on campus" (currently 54%). These rates would presumably be applied to the income coming to the unit in charge of the SSP through student fees/tuition and, if relevant, grants.

Of course, the setting of traditional overhead rates did not account for certain costs to the campus that are unique to an SSP. (1) The SSP should reimburse the campus for all salaries and retirement and health benefits associated with faculty members who teach in the SSP. (2) The SSP should also reimburse the campus for the additional work and staff required in OGS, Academic Senate, Admissions and department administrative offices. (3) As faculty and/or faculty time are redirected to provide support for the SSP, the SSP should be responsible for the costs (including startup) associated with additional faculty recruitment and hiring necessitated by the need to hire the new faculty necessary to maintain the ongoing responsibilities (for example, teaching and advising) of the unit hosting the SSP.

Another concern is the presence of a provision in the proposal saying that if an SSP has a cost overrun, then the campus is responsible. This greatly concerns CPB. No SSP should be considered for which there is even the smallest doubt about its ability to support itself, including the overhead and additional costs numbered (1)-(3) above. The campus should not be in a position of having to provide backup funds for an SSP at the expense of other programs. Further, the department that potentially benefits from an SSP should be responsible for a cost overrun, not the campus as a whole.

Finally, there are a number of provisions in the proposal that mention “monitoring costs” and so forth, but it is unclear who will do the monitoring and how the monitors will be paid. Financial monitoring should be at arms-length, and the costs associated with this monitoring should be born by the SSP through recharge or some similar practice.