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

November 14, 2022

Susan D. Cochran, Chair
Academic Council

RE: Systemwide Senate Review of Revision to Senate Regulation 630

Dear Susan,

The Santa Cruz Division of the Academic Senate has completed its review of the Systemwide Revision to Senate Regulation 630 with the Committees on Affirmative Action and Diversity (CAAD), Educational Policy (CEP), International Education (CIE), Teaching (COT) and Planning and Budget (CPB) responding. We appreciate the work of the Academic Council and UCEP to help address rising questions concerning online education.

Our campus largely found the proposed SR 630 revision to the “senior residency” policy to be concerning if the intention of this addition to the existing policy is in fact to address online courses and programs being developed at our individual campuses. CPB and CEP noted that the rush to close the “loophole” was not sufficiently thought through how this will be implemented and managed on our campuses. CPB argues, “To take one example, the UCSC Registrar would have difficulty implementing (and UCSC students would have difficulties verifying) the new regulation: UCSC does not normally track the mode of delivery on student transcripts.” Additionally, CEP states, “While 630 has been amended with sections B, D, and now E to meet the needs of joint programs, study-away opportunities, and online majors, we think 630 can be re-written to match the needs of current students’ educational goals rather than adding another amendment to patch an antiquated and restrictive regulation that doesn’t align with the path of all students.” CAAD echoes this point: “Given that Section D in the existing Regulation already makes exceptions for some of these available pedagogical experiences, it does not seem consistent to remove the potential flexibility that some majors and programs have found useful in helping students graduate.” These are just a few examples of how the proposed revisions could create unintended consequences for our students.

Our committees (CAAD, CEP, CPB, COT) agree that there needs to be more careful consideration and guidance for online courses and potential online undergraduate programs, and this should be prioritized at the systemwide level to help support our campuses. COT points out, “[W]e want to

echo the framework's document's observation that there is an important role for the Administration to play in articulating guidance around areas of online degrees that are under their purview, including fee structures for students and financing of online degree programs." CAAD raises additional issues related to how modalities of instruction have dramatically changed during the COVID-19 pandemic stating, "We have realized that different modalities may work better for different disciplines and curricula, and we still need a more thorough assessment of the outcomes of online courses for different student populations, especially for traditionally underrepresented students. The committee believes that possible equity impacts should be better understood before imposing the blanket solution of senior residency."

This brings us to a related issue for our own campus. Over the last couple of years UC Santa Cruz has been developing an online degree program, the Creative Technologies B.A., that has been reviewed and endorsed by our campus (CEP, CPB and the office of the VPAA), and submitted to UCEP. The potential revision to SR 630 would effectively prevent the launch of this program. CEP notes, "In contrast to some other online degree programs that have been considered at UCs, the Creative Technologies B.A. is a niche program that was conceived as explicitly conducive to and benefiting from an online format due to the focus on the types of learning projects and modalities that are involved in careers related to these technologies." They further urge that, "there should be an exception to any policy of this type in order to allow the capacity for the pending Creative Technologies B.A. and other specialized high-quality, well-conceived online degree programs that might be proposed in coming years." We are concerned that if this policy is approved, it could prevent the approval of our online program proposal. More importantly, we are worried that this would ultimately stifle creative and innovative pedagogical practices.

On behalf of the Santa Cruz Division, we thank you for the opportunity to opine on this critical proposed revisions to SR 630. We hope that these concerns will be addressed in any future proposed revisions. We have included the committee responses since they provide specific nuances and complexities.

Sincerely,



Patty Gallagher, Chair
Academic Senate, Santa Cruz Division

encl: Senate Committee Responses (Bundled)

cc: Kirsten Silva Gruesz, Chair, Committee on Affirmative Action and Diversity
David Lee Cuthbert, Chair, Committee on Educational Policy
Kent Eaton, Chair, Committee on International Education
Dard Neuman, Chair, Committee on Planning and Budget
Catherine Jones, Chair, Committee on Teaching
Matthew Mednick, Executive Director, Academic Senate

November 7, 2022

Patty Gallagher, Chair
Academic Senate

Re: Systemwide Proposed Amendment to Senate Regulation 630

Dear Patty,

The Committee on Affirmative Action and Diversity (CAAD) has reviewed the Systemwide Proposed Amendment to SR 630. While the idea behind the proposed amendment in the senior residency requirement seems reasonable, the committee thinks that possible equity impacts on current and future students (or programs) should be thoroughly examined first.

This amendment seeks to ensure that all students have a baseline of on-campus experiences, which are valuable for many. However, the method by which this is achieved - an additional senior residency requirement - is not appropriately attuned to the ways that students now are taking courses and completing their college careers: for example, studying abroad in their senior year, accepting an off-site internship and taking online courses during the final year, etc. Given that Section D in the existing Regulation already makes exceptions for some of these available pedagogical experiences, it does not seem consistent to remove the potential flexibility that some majors and programs have found useful in helping students graduate. There are also potential equity issues at play here regarding, for example, students who must return home for care-taking, students who leave campus due to mental health crises but still want to complete their degrees, and other special cases. This policy removes the flexibility that has been needed, and that may again be needed in the future, to work around unforeseen circumstances.

As we know, modalities of instruction have changed dramatically during the pandemic. We have realized that different modalities may work better for different disciplines and curricula, and we still need a more thorough assessment of the outcomes of online courses for different student populations, especially for traditionally underrepresented students. The committee believes that possible equity impacts should be better understood before imposing the blanket solution of senior residency.

Sincerely,



Kirsten Silva Guesz, Chair
Committee on Affirmative Action and Diversity

cc: David Lee Cuthbert, Chair, Committee on Educational Policy
Kent Eaton, Chair, Committee on International Education
Dard Neuman, Chair, Committee on Planning and Budget
Catherine Jones, Chair, Committee on Teaching

October 21, 2022

Patty Gallagher, Chair
Academic Senate

Re: Systemwide Senate Review of Revision to Senate Regulation 630

Dear Patty,

The Committee on Educational Policy (CEP) has reviewed the Systemwide Revision to Senate Regulation 630. Our committee noted several areas of significant concern with the proposed revision to the policy. We would like to begin by posing some broader questions regarding the intended function of Senate Regulation 630 and some concerns about potential problems it would create across the UC System and for UC Santa Cruz in particular. These include considerations of the evolving composition, learning goals, and needs of our student bodies; the disconnect between the goals of the proposed policy change and its current language and operation; and the challenges the new policy would create for some existing and proposed programs at UC Santa Cruz.

In many ways, the senior residence requirement was established to ensure that foundational work was accomplished during one's final year prior to entering into advanced degrees. As our committee notes, this may have been the "typical" path in the past. However, as our student bodies have diversified, and financial burdens have intensified, more undergraduates have been pursuing a wider variety of paths to help them graduate in a timely manner, and many want the ability to participate in important learning experiences beyond the home campus. More students are electing to complete their program requirements earlier in their career to either participate in a study away program or transfer in remaining credits in a "reverse transfer model" by sending in remaining credits to reach the 180 credit limit. While 630 has been amended with sections B, D, and now E to meet the needs of joint programs, study away opportunities, and online majors, we think 630 can be re-written to match the needs of current students' educational goals rather than adding another amendment to patch an antiquated and restrictive regulation that doesn't align with the path of all students.

The intent behind the proposed regulation seems to be the understandable desire to avoid loopholes that would allow individual programs to quickly or haphazardly create entire majors made up of online courses without any well-developed rationale or considerations of the strengths and weaknesses of online versus in-person modalities for different types of knowledge and skill development. However, the proposed legislative change would not address these valid concerns. Instead, the proposed regulation change, as worded, would allow a student to complete their in-person residence requirement in the freshman or sophomore year, or would allow a senior to complete courses not required for their major in-person while completing courses for their major online.

Since the intent is to ensure that programs don't provide fully online majors without approval, we would suggest that any proposed rule of this type be applied to programs, and not to individual students, who are already confused by the senior residence requirement. Furthermore, it is not clear how this type of regulation would be enforceable, given that some UC Santa Cruz classes are now approved as either in-person or online –and outside of the

location/modality advertised to students during *enrollment* there is no transcript-level record of the modality taken

Finally, the policy proposal poses particular challenges for UC Santa Cruz. If this revision to the policy were to be approved, the implications would raise questions and confusion regarding at least one of our existing programs as well as creating significant problems for one proposed program. The interdisciplinary Community Studies program (CMMU) is considered a residential program and approves students for field study of 15 units in fall quarter during the senior year. It is ambiguous whether this program would violate the standard articulated in the proposed revision: “on a campus of the University of California or physical locations affiliated with programs listed in SR630.D or in prison environments.” Will there be remedies or exceptions available for existing programs that don’t clearly conform to this guideline?

Moreover, the policy proposal would effectively prevent the launch of the proposed Creative Technology B.A. degree completion program at UC Santa Cruz. In contrast to some other online degree programs that have been considered at UCs, the Creative Technologies B.A. is a niche program that was conceived as explicitly conducive to and benefiting from an online format due to the focus on the types of learning projects and modalities that are involved in careers related to these technologies. This program has been developed through a rigorous process and has received careful review and endorsement at several levels, including the Vice Provost for Academic Affairs and the Academic Senate. Thus, we also strongly urge that there should be an exception to any policy of this type in order to allow the capacity for the pending Creative Technologies B.A. and other specialized high-quality, well-conceived online degree programs that might be proposed in coming years.

We appreciate the thoughtful consideration of this range of issues, and respectfully suggest that the proposed Systemwide Revision to Senate Regulation 630 be modified to address the concerns noted.

Sincerely,



David Lee Cuthbert , Chair
Committee on Educational Policy

cc: Kirsten Silva Gruesz, Chair, Committee on Affirmative Action and Diversity
Kent Eaton, Chair, Committee on International Education
Dard Neuman, Chair, Committee on Planning and Budget
Catherine Jones, Chair, Committee on Teaching

October 31, 2022

Patty Gallagher, Chair
Academic Senate

RE: Proposed Revisions to Systemwide Senate Regulation 630

Dear Patty,

At its meeting of October 18, 2022, the Committee on International Education (CIE) reviewed the proposed amendment to Senate Regulation 630. CIE concurred with the proposed revision to SR 630 and noted that, with respect to CIE's purview, the physical presence of international students on campus contributes significantly to the overall diversity and cross-cultural enrichment of our population at UC Santa Cruz.

CIE appreciates the opportunity to comment.

Sincerely,
/s/
Kent Eaton, Chair
Committee on International Education

cc: CAAD Chair Silva Gruesz
CEP Chair Cuthbert
CPB Chair Neuman
COT Chair Jones

November 7, 2022

Patty Gallagher, Chair
Academic Senate, Santa Cruz Division

Re: Systemwide Senate Review of Revision to Senate Regulation 630

Dear Patty,

The Committee on Teaching (COT) has reviewed the Systemwide Revision to Senate Regulation 630. We appreciate the Academic Council and UCEP's thoughtful consideration of important questions around online education and efforts to develop a nuanced path forward. We support the framework document's suggestion that UC should proceed in a way that is informed by data on student outcomes rather than speculative projections. There appears to be a high degree of agreement within the Senate that online degrees should not be of inferior quality to in-person degrees, as noted by the 2021 Systemwide Senate Review of Online Undergraduate Degree Task Force. Further, we want to echo the framework's document's observation that there is an important role for the Administration to play in articulating guidance around areas of online degrees that are under their purview, including fee structures for students and financing of online degree programs.

All that said, we share some of the reservations identified by our colleagues in the Committee on Education Policy (CEP) about the remedy proposed in Senate Regulation 630, which uses a revised senior residence requirement to forestall individual campuses' creation of online degree programs in the absence of a clear policy framework for Senate assessment of degree proposals. As the proposal acknowledges, students' pathways through degrees now entail many valuable experiences away from their home campuses. The complexity of the revised regulation seems to place additional burdens on students as they navigate requirements while trying to take advantage of the diverse educational opportunities the UC system provides. Further, as CEP notes, it's not clear that remedy would really achieve the objectives laid out in the letter.

We appreciate the opportunity to review this important proposed revision as the impacts of it could be significant for UC Santa Cruz.

Sincerely,



Catherine Jones, Chair
Committee on Teaching

cc: Kirsten Silva Gruesz, Chair, Committee on Affirmative Action and Diversity
David Lee Cuthbert, Chair, Committee on Educational Policy
Kent Eaton, Chair, Committee on International Education
Dard Neuman, Chair, Committee on Planning and Budget

November 7, 2022

Patty Gallagher, Chair
Academic Senate

RE: Proposed Revisions to Systemwide Senate Regulation 630

Dear Patty,

The Committee on Planning and Budget (CPB) has reviewed the proposed amendment to Senate Regulation 630. CPB viewed this proposed amendment from two vantage points. One, as a policy to close a loophole whereby an in-residence program might develop, incrementally and without Senate oversight, into a de facto online degree program. Two, as a stop gap measure for the UC system to gain time to properly think through the place or non-place of online undergraduate degrees at UC.

Regarding the first, CPB strongly agrees that the Senate needs to find a way to close the stated loophole. However, CPB finds the proposed amendment to be flawed and insufficiently thought through. To take one example, the UCSC registrar would have difficulty implementing (and UCSC students would have difficulties verifying) the new regulation: UCSC does not normally track the mode of delivery on student transcripts. We expect the Committee on Educational Policy (CEP) will address other difficulties with policy implementations as well as problematic policy implications.

CPB argues the proposed amendment measures are flawed because they are, in fact, designed to solve a separate problem: how to slow down the emergence of online undergraduate degree programs at UC. CPB won't rehash the arguments for or against online undergraduate degree programs. CPB does recommend, however, that systemwide Senate directly address one of the implied concerns regarding undergraduate online degrees: namely, that if one undergraduate degree program is approved, then others might no longer need to come before systemwide Senate review.

In summary, CPB finds that the proposed revisions to Systemwide Senate Regulation 630 to be urgently needed but, as presently written, flawed: the proposed revisions offer a solution to a problem (a premature opening of the UC's to undergraduate online degree programs) that is related to, but separate from the explicit problem of closing the loophole.

Sincerely,



Dard Neuman, Chair
Committee on Planning and Budget

cc: CAAD Chair Silva Griesz
CEP Chair Cuthbert
CIE Chair Eaton
COT Chair Jones