Resolution on UW System Draft Policy 102: Section Program Productivity Monitoring

WHEREAS the UW-Madison Faculty Senate recognizes the importance of regular program review to evaluate the deployment of resources to ensure their most effective use to ensure program quality and achievement of campus mission and strategic goals;

WHEREAS the expenditure of resources for programs of little value to students takes away resources from programs serving large segments of the student population;

WHEREAS students may consider some programs valuable for certificates and coursework while not necessarily wanting to major in them;

WHEREAS we recognize that UW System plays a role in ensuring institutions are offering the appropriate array of programs and has the authority to approve certain actions, at the same time curricular control lies with the faculty of the institution, not System administration;

WHEREAS UW System has appointed a task force to review SYS Policy 102, Sec. 6.3, “Monitoring Low-Degree-Producing Academic Degree Programs,” the charge for which includes “Create a new policy for monitoring low-degree-producing academic degree programs that has clearly defined criteria, monitoring thresholds, and a means to eliminate programs that do not meet expectations.”;

WHEREAS UW System has requested comment on the proposed modifications to SYS 102 by December 21, 2018;

WHEREAS the proposed new SYS 102 Program Productivity Monitoring Policy establishes a single metric (number of graduates over a five-year period) as the sole determiner of a program’s value without regard (except in the appeal process) to campus mission, campus size, strategic goals, interrelations of programs, importance of programs for recruiting and retention, or actual program costs;

WHEREAS the faculty representatives to UW System and others have proposed alternative measurements of program productivity, including but not limited to FTE/major and majors/total students;

WHEREAS Master’s programs partnered with a PhD program cost very little to maintain, are for the purpose of serving the rare student who seeks only a master’s degree in the field or a student who chooses not to finish the PhD, and should thus be considered as a single program for the purposes of this policy;

WHEREAS each campus has better data on its own programs than are available to System and, more specifically, System relies on CDR data, which may identify programs as low-degree when they are not;

WHEREAS UW-Madison has a robust and efficient program monitoring and review process and a longstanding degree policy already in place;
WHEREAS the proposed new SYS 102 Policy mandates closure of programs rather than flexibility for local campuses to determine the best ways to deploy resources for meeting local needs;

WHEREAS identified programs in the proposed policy are given only three years to address program deficiencies, which is not enough time to meet the metric based on changes made in response to having been identified as a low-production program, and other timelines indicated in the proposed policy do not conform to the standard academic calendar or program review process; and

WHEREAS the proposed policy removes final decision-making over programs from institutions and established shared governance processes;

THEREFORE, BE IT RESOLVED that the UW-Madison Faculty Senate requests that this draft policy not be approved in its present form;

BE IT FURTHER RESOLVED that we only accept the proposed metric as a way to identify programs for further evaluation and consideration and not as a valid index for determining a program’s value;

BE IT FURTHER RESOLVED that the final decision to keep or cut a program must be made at the institutional level where mission, strategic goals, interrelations with other programs, student needs, and other factors can be considered through shared governance processes;

BE IT FURTHER RESOLVED that appeals regarding program decisions should be heard and evaluated by existing governance procedures; and

BE IT FURTHER RESOLVED that UW System should not substitute itself for existing shared governance processes in local curriculum or programmatic decisions.
6.3 Monitoring Low-Degree-Producing Academic Degree Programs

6.3.1 BACKGROUND
Undergraduate programs offered by more than 50% of all UW institutions are those that are reviewed for degree productivity. The degree productivity expectation is no less than 25 graduates over a five-year period, excluding all world language programs and individually designed programs. The review period for new programs in this category begins six years after the program’s implementation.

6.3.2 PROCESS FOR LOW PRODUCING PROGRAMS

6.3.2.1 Institutional Review
UW institutions review and address low-degree-producing programs, based on mission and resources.

For all low-degree-producing programs, institutions may establish and follow more stringent policies or guidelines than those outlined in this section.

6.3.2.2 UW System Review
APEI conducts a review of all undergraduate majors in the UW System for degree productivity at least every five years as part of its responsibility for systemwide academic degree program array management. This review may be conducted separately or in conjunction with other UW System reviews of programs.

Programs that do not meet the degree productivity minimum expectations as described above are provided to UW institutions. Institutional responses are due to APEI via apei@uwsa.edu within 20 working days upon receipt of the information.

If an institution wants to retain a low-degree-producing program, the Provost provides a brief justification for continuing the program. The justification should include plans to increase enrollment, combine the program with another program, or offer the program in partnership with another institution. In addition, low-degree-producing programs that were previously identified as low-degree-producing and continue to be low-degree-producing must also provide a description of the strategies that were employed to increase enrollment and provide a document for the most recent academic year.

APEI will respond after a review of the information. The response will be included in the University of Wisconsin System Annual Program Planning, Review, and Array Management Report to the BOR (see Section 7.1).

If the institutional response is to suspend or eliminate a low-degree-producing program, no justification is necessary (see Section 3.3 and Section 3.4 for information on suspension and elimination).
102: Draft Policy Section Program Productivity Monitoring

1. POLICY PURPOSE
The purpose of this policy is to establish protocols for monitoring degree program productivity by UW System institutions as permitted by Wis. Stats. 36 and in accordance with Regent Policy Document (RPD) 4-12, http://wisconsin.edu/regents/policies/academic-program-planning-review-and-approval-in-the-university-of-wisconsin-system/. This policy also delegates authority for program reviews to UW System institutions and provides the parameters under which this delegation may be used. The policy outlined in this section is intended to define a process for academic degree program productivity monitoring as determined by the University of Wisconsin System Administration (UWSA) and the Board of Regents (BOR).

2. RESPONSIBLE UW SYSTEM OFFICER
Associate Vice President for Academic Programs and Educational Innovation

3. SCOPE
By statute, the responsibility to review and monitor academic programs rests with the UW System Administration and UW System institutions. This policy sets parameters for all UW System institutions for monitoring the productivity of degree programs. This policy applies to UW System institutions for monitoring all undergraduate and graduate degree programs according to established criteria. New programs will be monitored under this policy after the sixth year of implementation. Non-admitting graduate programs are exempt from this policy. All collaborative programs will be identified and monitored as one program for reviews related to this policy.

Chapter 36, Wis. Stats., codifies responsibilities for system-wide array management, such as monitoring academic quality, and establishing and maintaining access to educational programs. Regent Policy Document (RPD) 4-12, Academic Program Planning, Review, and Approval in the UW System, delineates the program-planning framework. UW System Policy 102 elaborates on RPD 4-12 and represents the principal policy guiding the UWSA and the UW institutions in operationalizing all activities related to system-wide array.

4. BACKGROUND
Reviews of academic programs are guided by accreditation standards from the Higher Learning Commission as well as RPD 4-12 https://www.wisconsin.edu/regents/policies/academic-program-planning-review-and-approval-in-the-university-of-wisconsin-system/. These policies require the institutions in the UW System to regularly review programs. Guidelines for monitoring low producing degree programs were incorporated into UW System Administrative Policy SYS 102, Section 6.3 on July 1, 2016. Criteria for elimination of programs are also outlined in SYS 102 3.4 Eliminating an Academic Degree Program. The revised policy identifies program productivity expectations, sets the frequency to monitor productivity every year, outlines action plans to remediate programs, identifies a process and criteria for appeals, and accelerates the timeline in which institutions are encouraged to consider alternative solutions to delivering low-degree producing programs.

4. [sic] DEFINITIONS

Academic program-academic major program approved by the Board of Regents. This does not include certificate programs, minors, or licensure only programs.

Program monitoring-system and institution level processes to examine academic programs guided by a set of criteria related to institution and UW System policy.

Criteria-indicators of expectations and standards for monitoring and reviewing programs.

Eliminate-discontinue an academic program that has been authorized by the Board of Regents.

Suspend-discontinue admission to an academic program until a decision is made to eliminate or continue the program.

Low productivity program-academic program that do not meet the criteria for program productivity.
Non-admitting graduate program—program that awards a master’s degree in route to the doctorate when a student does not continue to the doctoral program.

Collaborative program—An academic partnership in which one or more institutions is independently authorized to grant the degree. Two or more institutions or organizations establish a collaborative agreement to provide a proportion of the educational program.

6. POLICY STATEMENT
The program monitoring process will:
1. Identify programs that have low numbers of graduates.
2. Bring attention to low productivity degree programs more quickly than through an institution’s program review cycle.
3. Allow timely actions to strengthen a program.
4. Initiate processes to suspend, eliminate, or appeal elimination of low productivity programs.
5. Ensure the efficient use of the institution’s resources in support of its mission, vision and priorities.

Criteria:
The UW System Administration has the responsibility to monitor productivity for all academic programs annually in order to bring attention to those academic programs that do not meet the following criteria as indicators of program productivity.

Criterion: Number of graduates awarded degrees in a given period of time.

Bachelor’s degree programs
An average of 5 degrees awarded each year over the last five years. Note that collaborative program graduates are monitored as part of one program.

Master’s degree programs
An average of 3 degrees awarded each year over the last five years. Note that collaborative program graduates are monitored as part of one program. Non-admitting master’s programs are exempt from this policy review.

Doctoral degree programs
All doctoral programs will be monitored annually for specific criteria established by the doctoral granting institutions. Doctoral granting institutions will notify UW System about their monitoring processes and outcomes every three years through the UW System Annual Program Planning, Review, and Array Management Report.

Program Productivity Monitoring Process:
UWSA RESPONSIBILITIES
In order to facilitate the UW System program productivity monitoring policy, UW System will:
1. Establish and publish policies and criteria related to program vitality to be used across the System.
2. Provide data to institutions each year for all academic programs.
3. Notify institutions about suspension and elimination deadlines.
4. Track institutions’ responses about institution action plan related to program productivity.
5. Track institutions’ appeals for programs to continue offering the program.
6. Facilitate program review workshops.

PROGRAM REVIEW PROCESS
The Office of Academic Programs and Educational Innovation (APEI) and the Office of Policy Analysis and Research (OPAR) will monitor all programs in the UW System program inventory based on the number of graduates each academic year.
1. APEI will submit data about low producing programs to each institution by August 31st each year.
2. The institution will identify their programs on the list from System. After the review, and in collaboration with governance, the institution may take one of three steps outlined below.
   a. After receiving the data from System, the institution may decide to eliminate the program by the end of the current academic year following UW SYS 102 3.4 Eliminating an Academic Degree Program.
   b. Alternatively, the institution may decide to suspend admissions to the program following SYS 102 3.3., Suspending Admissions to an Academic Degree Program, and may create an action plan to remediate the program.
   c. An institution may also decide to appeal to keep the program despite low graduation numbers following the procedures outlined in this policy for an appeal.

3. If the institution decided to suspend a program in the hope of remediating the program, the institution will submit a plan of action to either remediate the low producing program or to suspend, eliminate, or appeal to keep the program by December 31st of the same year.

4. If an institution does not report an action plan for a low producing program within the specified time frame, UW System will communicate with the institution to engage its governance processes for program elimination with the institution per SYS 102 3.4 Eliminating an Academic Degree Program.

5. If the institution decides to continue the program and make changes to the program, the institution will implement its plan of action and report to APEI at the end of three academic years after the implementation of the revised program about the effectiveness of the changes and results. The institution will communicate with APEI about the program status as a part of the UW System Annual Program Planning, Review, and Array Management Report. If an institution significantly redirects a program or combines a program with another program, this new program will be reviewed a new review cycle both at an institution and with UW System.

6. If at the end of three years of implementation, the program still does not meet the criterion, UW system will communicate with the institution to engage its governance processes to eliminate the program using criteria provided by this policy and SYS 102 3.4 Eliminating an Academic Degree Program.
   a. The institution will submit written notification via https://www.wisconsin.edu/program-planning/program-form/ to Academic Programs and Educational Innovation with the intention of eliminating the program indicating the description of the program to be eliminated, potential impact on students and faculty, confirmation that the appropriate governance bodies have completed their review processes, and the effect date.
   b. In the event that there are students currently enrolled in the program, the institution will be responsible for developing a teach-out plan for the current students.

Institutional Actions to Be Taken After Program Is Identified as Not Meeting Criteria”

After UWWSA provides the institution with relevant data, the institution will conduct a program continuance review to identify one or more of the following possible action steps (from Aug. 31st to Dec. 31st). The institution will have one semester to submit a plan of action to UWWSA after notification by the UW System of a low productivity program (due Dec. 31st). Possible action plans to increase program productivity include the following.

1. Retain the curriculum with specific strategies to increase enrollment with additional resources.
2. Redesign the curriculum to make it more responsive to market demand and more appealing to students.
3. Convert the program to a minor.
4. Change the delivery model.
5. Redesign curriculum by combining it with another program/department within the institution.
6. Collaborate with another institution to offer the program.
7. Appeal the program status as outlined below.

The institution will have three years to implement this planned action after the program revision approval at the institution, at which time the institution will report on its progress through the APEI UW System Annual Program Planning, Review, and Array Management Report in June of each year. If after three years, the productivity of the program does not improve, UW System will communicate with the
institution to engage its governance processes to eliminate the program guided by the criteria outlined in SYS 102 3.4 Eliminating an Academic Degree Program.

APPEAL PROCESS
There are two types of appeals for the degree monitoring process.

1. UWSA will evaluate an institution’s appeal for one or two-year extensions for elimination of low productivity programs by examining the probability that a program will meet its graduation goals.

2. UWSA will also evaluate an institution’s appeal to keep an academic program that is considered critical to the institution’s mission. The institution should address the following components in an appeal process:
   1) The quality of the program in the areas of teaching and learning, and the contributions of its faculty in research, creative activity, and service;
   2) The contribution of the program to the mission and strategic plan of the institution, the overall quality of academic offerings, and the strategic plan of the institution;
   3) The resource implications of retaining or eliminating the program;
   4) The total enrollment of a program and its contribution to other institution programs such as general education or the program’s role in relation to other majors;
   5) The uniqueness/redundancy of the program within the institution and across the UW System;
   6) The impact of program elimination on system-wide array and student access to programs.

3. An appeal committee consisting of faculty representatives, academic planners, Provosts, and the Associate Vice President of Academic Programs and Educational Innovation will review the appeals and make a recommendation to the Vice President of Academic and Student Affairs.

4. The final decision will be made by the Vice President of Academic and Student Affairs.

7. RELATED DOCUMENTS
Within the scope of Chapter 36, Wis. Stats., the BOR, the UWSA, and the UW institutions have specific roles in program planning, approval, delivery, implementation, reporting, and review. Chapter 36, Wis. Stats., gives the BOR the authority to “ensure the diversity of quality undergraduate programs.” In fulfilling this statutory role, the BOR has oversight over the UWSA and the UW institutions “to ensure that these entities meet their respective roles and 9 responsibilities.” As a steward of the UW System’s overall resources, the BOR is also responsible for ensuring a balance between access to education and cost-effectiveness in the development and maintenance of programs. The BOR requires the UWSA and the UW institutions to follow the specific principles, guidelines, and practices described in RPD 4-12. SYS 102 operationalizes these principles, guidelines, and practices.

8. POLICY HISTORY
   SYS 102 Section 6.3
   SYS 102 Section 3.3
   SYS 102 Section 3.4
   ACIS 1.1 and ACIS 4 ACPS 1 and 1.1
   Guidelines for Academic Program Suspension, November 2009
   Monitoring Low-Degree-Producing Programs, July 2010
   Principles for Academic Program Consolidation and Elimination, April 2003

9. SCHEDULED REVIEW
January 2021
UW-Madison (Admin) Comments on Program Productivity Monitoring Policy
Submitted Nov 21 2018

Introduction to Section 6. Policy Introduction
The program monitoring process will:
1. Identify programs that have low numbers of graduates.
2. Bring attention to low productivity degree programs more quickly than through an institution’s program review cycle.
3. Allow timely actions to strengthen a program.
4. Initiate processes to suspend, eliminate, or appeal elimination of low productivity programs.
5. Ensure the efficient use of the institution’s resources in support of its mission, vision and priorities.

Comment
Statement 1 is limited by the data in the CDR, which includes only two of students’ degree majors, so while this is an accurate statement it may identify programs as low-degree when they are not.
Statement 2 is debatable given that at least UW-Madison runs a report like this on our graduates annually, in keeping with our long-standing low degree policy, a section of our program review policy. Statements 3, 4 and 5 suggest that institutions are not bringing timely actions or assuring strong programs, or evaluate the cost of low degree programs. Given some of us have longstanding and effective policies perhaps a rephrasing to signal more of a partnership would be in order.

Criteria Section
Bachelor’s degree programs
An average of 5 degrees awarded each year over the last five years. Note that collaborative program graduates are monitored as part of one program.

Comment
The data used for the low-degree analysis is the CDR. The CDR only collects up to two majors per degree. Especially for bachelor’s programs where a substantial share of students have more than two majors, the CDR is not sufficient to determine this metric. We will be evaluating the degree to which this is relevant in an analysis of the low-degree file against our census degree file and will update you when we have completed that analysis.

Master’s degree programs
An average of 3 degrees awarded each year over the last five years. Note that collaborative program graduates are monitored as part of one program. Non-admitting master’s programs are exempt from this policy review.

Comment
Thank you for being responsive to UW-Madison concerns and adding the exemption for non-admitting master’s programs. We have also had some discussion and considered how we handle our local policy. There many Master’s programs that do not meet the 15 degrees in 5 years standard but are admitting. When they are a partner to a robust PhD program we have exempted them because again their main purpose is to serve students, either the rare student who seeks only a master’s degree in the field or a student who chooses not to finish the PhD. There is little cost to maintaining these master’s programs compared to the value to students to keeping them. In general, for research graduate programs the masters and PhD are treated as a single program. Thus we propose the addition of language to exempt masters programs that are partnered with an active PhD program in the same area of study (same name).

Doctoral degree programs

Comment
We very much appreciate the current policy that recognizes our ability to monitor our PhD programs.
Program Review Process Item 3 - If the institution decided to suspend a program in the hope of remediating the program, the institution will submit a plan of action to either remediate the low producing program or to suspend, eliminate, or appeal to keep the program by December 31st of the same year.

**Comment**
We would ask that the timeframe for a response be moved to March 1 or to the annual program array report. To accomplish the discussion and planning you seek in just a couple of months in the fall semester when so much else is going on will result in a pattern of a routine appeal because we can’t realistically meet this deadline. Item 3 and 4 together create stress and frustration when what you want is a thoughtful and careful consideration of a way forward. Success in these endeavors comes from persistence and patience and clear messaging. A report by March 1 or in the next program array report cycle makes for time to develop a serious and considered plan.

Program Review Process Item 5 – If the institution decides to continue the program and make changes to the program, the institution will implement its plan of action and report to APEI at the end of three academic years after the implementation of the revised program about the effectiveness of the changes and results. The institution will communicate with APEI about the program status as a part of the UW System Annual Program Planning, Review, and Array Management Report. If an institution significantly redirects a program or combines a program with another program, this new program will be reviewed a new review cycle both at an institution and with UW System.

**Comment**
We would ask that the requirement to report specifically on a program be removed if the program degrees go above the low-degree threshold. A report should only be required for a program still at the sub-threshold level after 3 years. Communication as much as possible should only be at the annual report time and not at other times. In the last sentence there is a reference to UW System engaged with UWs in program review. Some may recall that we stopped the joint review practice several years ago because it was ineffective, expensive and time-consuming. Please do not return to a joint reviews. The review should be conducted on the UW side with reports, but no joint reviews please.

Program Review Process Item 6

**Comment**
It would be helpful to note in item 6 an appeal process. Certainly unilateral action is appropriate in a non-response situation, but if a UW is working in good faith with program faculty gentle pressure would be more useful at getting to a happy resolution than threatening language.

Actions taken when a program is not meeting criteria: After UWSA provides the institution with relevant data, the institution will conduct a program continuance review to identify one or more of the following possible action steps (from Aug. 31st to Dec. 31st).

**Comment**
For reasons noted above, four months is not enough time for an academic discussion of any substance to happen at the department and school/college level and have provost office review. A March 1 timeframe would produce more thoughtful consideration. Even better would be reporting at the time of the annual program array report.

Actions taken when a program is not meeting criteria: List of possible actions.

**Comment**
For item 3 in the list we suggest adding “or certificate”. UW-Madison does not use minors in the traditional way.

About staffing and expense, and lost effectiveness in relation to other quality processes

**Comment**
Overall, I would urge a review of the policy to remove components that add an onerous burden to either UW or UWSA staff. There are many steps here that will require considerable effort and
will take us away from other work on program quality (assessment, program review, program change process, improving time to degree). The costs of implementing this policy could become more than the savings generated by forcing program closures. As written it seems it will require new staff at System Admin and will divert staff in the provost’s office and school/college dean’s offices. This proposed process puts provost office staff in a very tough position to be heavy handed with our colleagues in a way that may be counter-productive to overall program quality goals we are working on collectively. Adjusting expectations of reports would be a big help with that.

Thank you System colleagues for work on this policy and for providing this opportunity to comment.