To: Professor Linda Sarna, Chair
Academic Senate

From: Professor Troy Carter, Chair
Undergraduate Council

Re: Undergraduate Council Response to the Draft Online Education Policy

February 22, 2013

The Undergraduate Council considered the draft UCLA Online Education Policy during its meetings on February 8 and February 22, 2013. Vice Provost Kathryn Atchison, who chaired the task force that developed the draft policy, was present to discuss the proposed policy and answer questions from the membership. The Council is pleased to see UCLA taking the lead in establishing policy for Online Education and would like to thank Vice Provost Atchison and her committee for their work in addressing a challenging and rapidly changing area of education. During discussion with Vice Provost Atchison and during Council deliberations afterward, some concerns were raised about aspects of the draft policy; these are outlined below.

1. **Non-matriculated versus Matriculated, MOOCs versus Online UCLA courses**: The Council feels that great care needs to be taken in establishing policy and an Office of Online Instruction which is meant to deal simultaneously with matriculated students (and on-campus online courses) and also non-matriculated students (and courses like MOOCs). The Council endorses the viewpoint that UCLA should be developing online courses to serve both populations and agrees that there are many benefits to outreach to non-matriculated students through online education. However, while there are common aspects of these courses that might benefit from joint oversight (technical underpinnings, pedagogical approaches, need for resources), the goals of these two types of courses are not guaranteed to be well-aligned.

In particular, the potential for revenue generation by courses targeted at non-matriculated students is a clear difference. The Council is worried that given this revenue-generating potential of online courses targeted at non-matriculated students, the proposed Office of Online Instruction might focus resource use toward courses for non-matriculated students (or toward courses perceived to be able to serve both non-matriculated and matriculated students) to the detriment of courses that might serve matriculated students exclusively. A related concern is that this would lead the office to focus on “purely online” courses (which are suitable for delivery to non-matriculated students) rather than focusing on supporting the development of blended/hybrid/flipped courses. The latter courses can only be used on campus but arguably could result in wider use (all UCLA courses could potentially benefit from some use of online instruction) and more profound impact on pedagogical effectiveness than fully online courses.
The draft policy does address these concerns in part: first, revenue-generation is low on the list of criteria for prioritization of new online courses (page 6 top); second, the policy states that “... instructional technology on campus is primarily motivated to help ensure academic success for UCLA’s matriculated students...” However, the Council still feels that the draft policy should be modified to emphasize elsewhere that highest priority is given to online courses targeted at matriculated students. The top priority in the draft policy is “impact of the course”; this highest priority could be made more specific (the Council notes that “impact” could be interpreted to include impact on the finances of UCLA). This top priority might be modified to “impact of the course on the successful education of matriculated UCLA students.” A second highest priority might be added: “impact of the course on UCLA’s public mission.” Additionally, it may be warranted to consider separating the governance of online courses for matriculated and non-matriculated students.

2. **Role of UNEX**: The current draft policy does not extend to extension courses and also does not include language concerning partnering with UNEX in the area of online courses. The Council feels that UNEX could be the right organization to lead UCLA’s effort to reach non-matriculated students with online courses and MOOCs. The Council recognizes that there are significant challenges that might arise in partnering with UNEX; for example the flow of revenue back to the campus and branding. However given UNEX’s established experience in fielding online courses to non-matriculated students, it seems appropriate to explore this option.

3. **More clearly delineating Senate and OOI roles**: The Council appreciates that the draft policy clearly states that Academic Senate approval for online courses precedes and is required for consideration of the course by the Office of Online Instruction. However, the current draft includes language about OOI setting “pedagogical practice expectations.” The Council feels that control of pedagogical practice, including ensuring the facilitation of proper student-instructor interaction in an online setting, should be the purview of the Senate and part of the Course Approval process. The OOI could be a clearinghouse for information and training on online pedagogical techniques, but it should be left to the faculty to set expectations for these techniques. The Council insists that the draft policy be modified to clarify the role of the Senate in establishing expectations for online pedagogy.

4. **Example course development paths**: The draft policy might be modified to clarify and provide examples of pathways to initiate development of new or converted online courses. Will the OOI act to set priorities for the development of courses and reach out to specific faculty and departments to initiate development? Will the OOI offer or require some minimal form of training? Will there be the equivalent of an RFP process for new courses open to all faculty/departments? How does this articulate with Senate approval (e.g. could seed money be given to a department/faculty member by OOI to do pre-development prior to seeking Senate approval for the course)? There are likely to be many distinct pathways for course development (e.g. SSP courses versus MOOCs versus converted upper division major courses).

The Council feels there should be a great deal of flexibility in the final policy and so it is not clear that setting down rigid rules for development pathways is necessary. However, in order to more clearly articulate the roles envisioned for OOI, Faculty, and Departments in the course development process, it might be useful to provide a set of example course development pathways.
5. **Faculty/DIA Compensation Model:** The draft policy takes the stance that the development of online courses should be treated as an “Outside Professional Activity.” The Council feels that this is entirely appropriate for development of courses for non-matriculated students (e.g. MOOCs). However, applying this to online courses for matriculated students carries the implication that the development of these courses is not part of our core educational activities, and also that the primary motivation for creating these courses may not be improved pedagogy. The policy should allow for course creation to be compensated by course release, which is more typical for the development/improvement of standard courses.

6. **Course ownership and Intellectual property rights:** The Council has concerns about the proposed policy on ownership of copyright for online courses when university resources are used to produce the course. The default is for the course to be considered a commissioned work and for copyright to be assigned to the University. The Council feels that it would be more appropriate for copyright to remain with the Instructor/DIA. This approach is consistent with other circumstances where university resources are used to produce scholarly work (e.g. a journal article published with the help of university laboratory infrastructure) and with practice within other organizations (for example, the Writer’s Guild). It is reasonable for the University to expect to be able to make use of the course after investing in its production; however, alternative arrangements may be developed, for example a licensing agreement between the DIA and the University. The Council recommends that alternative strategies for copyright assignment be explored.

The Council thanks you for considering the concerns noted above and looks forward to an invitation to review future drafts of the policy. Please contact me (x54770; tcarter@physics.ucla.edu) or Academic Senate Policy Analyst Melissa Spagnuolo (x51194; mspagnuolo@senate.ucla.edu) if you have any questions.

cc: Jaime Balboa, Chief Administrative Officer, Academic Senate
    Linda Mohr, Assistant Chief Administrative Officer, Academic Senate
    Melissa Spagnuolo, Principal Policy Analyst, Academic Senate
To: Linda Sarna, Chair/Academic Senate

From: Joseph Nagy, Chair/Graduate Council

Date: March 1, 2013

Re: Senate Item for Review – Report of the Online Education Task Force

The Graduate Council considered the report of the UCLA Online Education Task Force at its meeting on February 15. Overall we acknowledge the need for the campus and UC system to develop policies and protocol for the creation and delivery of online courses. In this context, we support UCLA’s efforts to draft a policy for online instruction. However, members posed many questions and requested clarification on a number of the report’s assertions and recommendations (detailed below) that ought to be considered before the report is finalized.

ał UCLA Policy for Online Instruction. Insofar as our comments are meant to be constructive, we were struck by the document being labeled as a “policy” when it appears to be more of a labor management document. Is the document intended to be a new administrative policy? How does it fit in with existing policies? Additionally, given the number of divisional and system-wide working groups, task forces, blue ribbon panels, and standing committees that are charged with developing recommendations about online education, members felt that the report should have been accompanied by a status update on all the work being undertaken by the UC and UCLA, so as to give the reader a sense of where this document fits in with the constellation of other documents that are presumably forthcoming.

aleza The role of the proposed “Office for Online Instruction.” While appreciative of the report’s recommendation to “align the academic and administrative facets of online instruction” by creating a “single point of contact for supporting department and institutional concerns and interests about online instruction,” members opined that the document was too vague with respect to governance issues. Although the Office’s role is assumed to be more technical in nature, the report should elaborate on its specific function and clearly differentiate between the faculty’s authority over the curriculum and content of courses, and the Office’s assistance with ensuring the quality of the course’s delivery. Members also found that the report did not sufficiently clarify the issue of course ownership, including the rights of the University to disseminate course content without the instructor’s expressed permission, or the rights of the faculty to disseminate course content without the University’s expressed permission. Concerns were also raised about the centralization of online course creation and delivery, noting that the “policy” could be too restrictive and preclude some faculty from using new and more cutting-edge technologies.

aleza The impact on instructors. Members noted that the report should acknowledge the role of teaching assistants in the delivery of online instruction, and the training of TAs (and other
instructors) in using online technologies and in trouble-shooting when online formats may result in technical difficulties/system malfunctions. Members also asked about faculty and teaching assistant workload, and whether such calculations are being made with respect to delivering an online course. An optimistic member inquired if the propagation of online courses might lead to additional teaching assistantships.

As always, we appreciate the opportunity to opine on the document. If you have any questions related to our response, please do not hesitate to contact me.

cc: Jaime Balboa, Chief Administrative Officer, Academic Senate
    Linda Mohr, Assistant CAO, Academic Senate
    Kyle Cunningham, Policy Analyst, Graduate Council
    Stephen Truong, MSO/Executive Assistant, Academic Senate
March 4, 2013

Linda Sarna
Chair, Academic Senate

Re: Response to Proposed Online Education Policy

Dear Linda,

The Committee on Instruction and Technology (CIT) discussed the proposed Policy on Online Education that was developed by the taskforce chaired by Vice Provost Atchison. The committee believes that, by way of preamble, the policy should acknowledge that what UCLA currently has developed, in terms of bricks-and-mortar curriculum, is already world-class. We received 100,000 applicants for undergraduate admission to UCLA from students who want to enroll at our campus as we currently are. UCLA has mastered providing a positive and rigorous experience for its graduate and undergraduate students; a cornerstone of this experience is the academic community we foster as a residential campus. Online education at UCLA should be developed insofar as it augments and enhances our existing programs.

Although CIT is grateful for the work of the taskforce on this important matter, we believe significant revisions are required before this policy can be adopted by the campus. Please allow me to explain.

1. **The Scope of the Draft Policy.** The draft as written contains policy statements regarding intellectual property that rightly belong in a draft policy. But the draft also included a recommendation for the creation of an administrative unit—which isn’t policy per se, but an organizational restructuring. We do not take issue with the recommendation, but the creation of such an organization appears misplaced in a statement of online educational policy.

2. Other elements we would expect to see in a draft policy were absent. We would expect a campus policy to address the comingling of matriculated and non-matriculated students. Is it permissible? Under what circumstances? In what ratios? CUARS and the Graduate Council set standards for admissions to UCLA. A policy that addresses, for example, enrollment in Massively Open Online Courses (MOOCs) should begin to articulate the role of MOOCs and MOOC administration vis-à-vis established admissions standards. How does the policy anticipate managing credit-bearing courses with regard to non-matriculated students? This part of the online policy is outside the purview of the taskforce, but what recommendations does it have for the Senate on this topic?

3. We would expect a campus policy on online courses to address how much of a student’s coursework can be completed online. Admittedly, this is the purview of the individual departments and IDPs, with the approval of the appropriate Academic Senate body. And there will be great variability across the disciplines,
and between graduate and undergraduate programs. Even so, a policy on Online Courses could suggest a framework for developing a course; a framework which would be approved by the campus.

4. **Office for Online Instruction.** The Committee found it curious to discuss the recommendation of the creation of an administrative unit under the auspices of a draft policy. Such a recommendation could be part of the cover letter of the taskforce report, but appears to be out of place in a campus policy.

5. The charge of the Office for Online Instruction and its description is troubling. If it is the intent of the taskforce that the Office for Online Instruction be a resource for the campus, and not regulatory in nature, this should be stated clearly, and perhaps indicated in the name of the Office.

6. The draft policy makes clear that the approval of courses remains the purview of the Academic Senate, but appears to give the Office of Online Instruction veto power over offering courses online. The committee does not agree that the decision to develop an online course should be the purview of the Office. For example, it is conceivable that an approved program has as part of its curriculum an online course. If the Senate has already approved the program (and the Senate only approves programs after the proposal has been reviewed by the Academic Planning and Budget and the Office of Analysis and Information Management), and the academic dean and EVC have endorsed the program, then the online course must be developed.

7. Transitioning existing courses not previously conceived of as online, blended, inverted, etc., also raises concerns. It must be perfectly evident in a policy that online education at UCLA exists to advance the teaching, research, and service mission of the university and therefore the metrics we employ when developing and evaluating such courses, while inclusive of financial impact and viability, are not primarily financial. Return on investment must be weighed generally in relation to the tripartite mission of the university, and more specifically in relation to the program in which the course sits.

8. **Intellectual Property of the Faculty.** Currently, as the report points out, the default position of the UC Policy on Ownership of Course Materials is that materials created by “Designated Instructional Appointees” are owned by them unless they use so-called “Exceptional University Resources” or are otherwise constrained by a Commissioned Work Agreement. The linchpin of the model being proposed utilizes the standard of “exceptional resources,” under which the University could define virtually all instructional activities conducted via the Internet as using “exceptional university resources.” It would also redefine the design and preparation of most such technology-supported instruction as commissioned work that lies outside the usual faculty teaching load or responsibilities, and once produced, the University would have exclusive and perpetual rights to that work and those materials. “Exceptional Resources” is a rather weak criterion for asserting University ownership of course content, as what is considered “exceptional” can change quickly. Not long ago, a computer in the classroom might have been deemed “exceptional.”
These two consequences of the proposed draft policy undermine the spirit of the UC Policy on Ownership of Course Materials – which, unlike the policies at many lesser universities, recognizes faculty course designs and materials as their own creative work rather than fungible assets retained by the employer. More importantly (particularly as we might expect more instruction to move online in the future), by redefining most technology-supported teaching as products and work for hire governed strictly on a contractual basis by CWAs made by the university with individuals (who might include not only ladder faculty but a vastly expanded roster of temporary hires), these policies have the potential to move a great deal of mediated teaching beyond Senate oversight. What happens, for example, if a ladder faculty member develops online course materials, and then moves to another institution -- would the University invoke something like a do-not-compete clause that would prevent that faculty member from teaching similar content in a similar style elsewhere? Moreover, there are cases when online instruction overlaps inextricably with a faculty member’s research (as it the case, for example, in the Digital Humanities). Can and should the University lay claim to materials developed that are both research and teaching oriented? These possibilities are troubling and must be addressed in any proposed policy that would gain the endorsement of CIT.

Thank you for the opportunity to review this important draft proposal. The committee would welcome the opportunity to review future iterations of it as if progresses.

Sincerely,

John Mamer
Chair, Committee on Instruction and Technology

Cc: Jaime Balboa, CAO, Academic Senate
    Mark Kaminsky, Policy Specialist, Academic Senate
March 1, 2013

Professor Linda Sarna  
Chair, UCLA Academic Senate

Re: Report of the Online Education Taskforce: Council on Planning and Budget Response

Dear Professor Sarna,

The Council on Planning and Budget (CPB) discussed the report of the Online Education Taskforce at our meetings on February 11 and 25, 2013. We appreciated the presentation and opportunity to ask questions of the taskforce Chair, Vice Provost Kathryn Atchison, at our initial discussion. In response to the charge, the Taskforce has proposed the creation an Office for Online Instruction, which would have the primary responsibility for supporting and implementing the policy recommendations made in the report. Issues related to IP ownership, use of faculty materials for courses, copyright clearance, and revenue distribution are discussed in the Policy recommendations.

CPB recognized the value of having central resource to assist faculty in developing and delivering online courses, and development of policies to define the rights and responsibilities of providers of online education. However, there was considerable concern over the application of a patent model for guiding our next foray into online education. The proposed policy develops a new oversight structure (with technical and administrative overhead), the Office for Online Instruction, with enforcement rights beyond the current curriculum committees of the faculty. Course materials are required to fit into a standardized look and feel. While this may appeal to sense of Brand identity, and perhaps have some benefit in navigation across courses, there is significant concern that it may be a barrier to innovation and providing the opportunity to develop a unique identity for individual courses. At least in the early stages of exploring online opportunities, restrictions that may inhibit faculty participation should be avoided, where possible. As part of this oversight role, it appears that the Office for Online Instruction would have approval power over the course, barring it from presentation if it did not meet the production standards established by the Office. This is clearly not the process for traditional courses, and it is not clear why online curriculum would be treated differently. We appreciate the inclusion in the policy that current review processes (Department, School and Academic Senate) for regular credit courses, undergraduate, graduate and professional, are maintained in the domain of the Faculty for course approval. However, we also feel the ultimate decision on whether, for example, a course for undergraduate degree credit meets certain standards for presentation is under the purview of the Undergraduate Council of the Senate.

The provision of a variety of levels of support from the Office for Online Instruction or any similar resource appears, in the proposed policy, to indicate the “use of exceptional University resources” in
development of the course. This argument is being used to justify the university ownership of the materials. This is contrary to the current state, where the faculty member retains the intellectual property rights for course materials (excluding those reviewed by curriculum committees for course approval). It is not clear that providing a ‘digital classroom’ and the tools necessary for faculty development of quality online courses should be considered an exceptional university resource, when the provision of a physical classroom and supporting resources currently isn’t considered an exceptional university resource. In fact, the publicly stated hope is that there is a significant cost savings to the University from implementation of online courses. It would be critical, particularly for junior faculty, that the faculty members producing the course materials maintain the IP rights, as they currently do.

Under the terms of the Commissioned Work Agreement (CWA), people that are not University faculty could develop courses. As the Contributor, it is not clear how a non-UC employee will seek approval of the Department that would house the course. An additional complication introduced by the CWA is that a course developed by a UCLA faculty member could be taught by anyone selected as the Online Course Instructor. The process to determine the instructor of record for a course is not stated, and there is concern that the way they are appointed may differ from current practice (SR750). This might be troublesome for courses that are for degree credit and part of the regular teaching responsibility of a faculty member.

In the definitions of the proposed policy, online instruction is described as a continuum, which includes “in class”, where there can be some use of digitally enhanced and internet linked elements. This definition of online instruction would include most of the classes now being taught on campus. It might be helpful to clearly indicate in the definition what the definition for will be for “online course” that would require submission to the Office for Online Instruction.

CPB clearly recognizes the effort of the Taskforce to provide a central resource for the advancing the development and delivery of quality online courses within the scope of improving access and delivery of education to the UCLA constituency. We also appreciate the significant issues related to development of additional funding that may occur with online courses while at the same time maintaining the UCLA standards of quality. But we see the UCLA brand including recognition for both quality and innovation. There is concern that the perceived issues with the policy presented above will limit the strong engagement of UCLA faculty in such an endeavor. The development of an online sandbox/toolbox, with tools for experiment with content development and delivery, and a mechanism to promote and incentivize faculty participation would be worth consideration.

Sincerely,

Neal Garrett
Chair, Council on Planning and Budget

cc: Jan Reiff, Vice Chair, Academic Senate
   Andy Leuchter, Immediate Past Chair, Academic Senate
   Jaime Balboa, Chief Administrative Officer, Academic Senate
   Linda Mohr, Assistant Chief Administrative Officer, Academic Senate
   Members of the Council on Planning and Budget
March 4, 2013

Linda Sarna
Chair, Academic Senate

Re: Response to Proposed Online Education Policy

Dear Linda,

The Committee on Library and Scholarly Communication (COLASC) has reviewed the draft Policy for Online Instruction and has concluded that as the document is written, the committee cannot offer its endorsement without significant revisions and clarifications.

1. **Benefits of Online Instruction.** The document seems to lack a sufficient degree of discussion regarding the pedagogical advantages of online education, while focusing more on the organizational structures and thoughts about “ownership”. While it does force one to think about the assumed desirability of implementing a range of “Online Education” components into one’s everyday classroom practice, the reasons why students and instructors might benefit from these developments remain obscure. Some reflections on the pedagogical advantages of strengthening the “Online Education” element in our teaching at UCLA are lacking from the “Introduction” to this draft. The proposal also appears to be modeled on UCOE, in that it envisions selling classes to non-UC students. However, UCOE has not been successful in attracting these non-UC students and appears therefore to have no effective business model. Replicating a failed business model is a waste of public resources and a direct threat to other budget priorities.

2. **Intellectual Property.** The document establishes an intellectual property framework that has enormous implications for faculty. It notes that the “Designated Instructional Appointee” retains ownership over the course materials without the use of Exceptional University Resources. Much further detail is required with regards to what constitutes an “exceptional” university resource, especially when technologies are ever-changing. The institution of a Commissioned Work Agreement as stated in the Policy also begs further analysis, as there should not be a significant difference in the way the development of course materials for online courses and traditional classroom courses are treated.

3. **Standards.** In order to meet the needs of a given course or academic program, instructors must have the flexibility to be innovative with methodologies, which may lie outside those conventionally associated with online education (such as lecture videos and chat sessions). How these methodologies could be affected by standards set by the proposed administrative Office remains unanswered. It is important to note that while resources for online education should be available to academic departments, the proposal as written seems to assume a regulatory responsibility, which would become a direct threat to faculty control of
curriculum and methodology. If established, the purview of the Office should remain as a resource of support, rather than one of validation and regulation.

4. **Effect on the Library.** An issue of natural concern to the committee is where the library fits into a discussion regarding online education. As library collections and resources become increasingly digitized and distributed with new technologies, the concept of the “exceptional” university resource as it relates to university libraries becomes very concerning. If digitization or other services are seen as "exceptional resources" the outcome will likely be a chilling of nascent faculty collaborations with the library as faculty worry about the overly broad nature of the Commissioned Work Agreement. We must be mindful of the library's central role in higher education, whose resources must remain open and accessible for the development of course material and instructional methodologies, regardless of its distribution platform.

Thank you for allowing the Committee on Library and Scholarly Communication the opportunity to offer its perspectives on this proposed policy.

Sincerely,

Francis Steen  
Chair, Committee on Library and Scholarly Communication  
Cc: Mark Kaminsky, Policy Specialist, Academic Senate
March 4, 2013

Linda Sarna
Chair, Academic Senate

Re: Response to proposed UCLA Policy for Online Education

Dear Linda,

The Committee on Continuing and Community Education (CCCE) discussed the proposed UCLA Policy for Online Education that was developed by the taskforce chaired by Vice Provost Atchison and reached the conclusion that it could not endorse the policy without significant revision and/or clarification on a range of items, as listed below.

New administrative infrastructure: The creation of a new administrative unit, the proposed Office for Online Instruction, raises many questions about its scope and purview. A new administrative infrastructure should only be created if absolutely necessary in order to oversee and implement aspects of online education that are not being handled by, nor could possibly be incorporated into, administrative units already in existence that are currently developing and delivering online courses and programs. We are concerned about redundancy and duplication of efforts based upon lack of communication and coordination between administrative units, and inefficient use of resources necessary to maintain this new administrative infrastructure. In other words, it may be possible to institute a university policy regarding online education that does not require a new administrative body but instead consolidates all current stakeholders and administrative units dealing with online education into one large administrative unit including Campus programs, UNEX, Summer Sessions and Self-Supporting Initiatives. Duties and responsibilities for this important body should be clearly defined and outlined from the outset, with specific areas of responsibility allocated to member units based upon depth of experience and expertise in online delivery. The UCOP online initiative should also be represented in this office – all of the above in order to efficiently use existing resources (financial as well as personnel), to encourage collaboration between units and to be certain that information and best practices are being communicated clearly across campus and system-wide.

Additional clarification is needed with regards to what the Office sees as its primary function. As each campus department and/or academic program has different requirements for how course material is delivered most effectively to its specific student body, a central office that is regulatory in nature could undermine the autonomy of academic departments and programs. In other words, the responsibility for deciding the appropriateness of an online course should rest firmly with those who are most familiar with the requirements of a course or program. If created, one important aspect of the Office should be to act as a resource center that provides guidance for those units interested in developing online courses and programs, but should not make fundamental decisions on which courses are offered online or how the material is delivered. Ensuring compliance with state or federal regulations that may affect online instruction should definitely be filtered through this Office.
**Goals of Online Instruction:** What are the goals of online instruction? While financial resources should be considered, they should not be the primary driver of any decision to offer online courses and programs, as the quality of instruction received by each UCLA student should always be considered first. If quality of instruction does not diminish if offered online, as compared to traditional classroom formats, then financial considerations can be evaluated. It is important to emphasize that the development of online courses is very costly, and profit is not guaranteed, thus the CCCE is very concerned about this important aspect of online initiatives.

On the positive side, the CCCE is very supportive of using online delivery to increase access to non-matriculating, non-traditional and under-resourced students, who would otherwise not have access to the outstanding faculty and programmatic content offered by UCLA.

**Production Standards for Online Courses:** Obviously, content standards are the responsibility of each academic department. As written, more clarification is needed as to what production standards would be required and initiated. We must be mindful not to limit creative methodologies and technologies that may help instructors effectively deliver course material, especially in regard to programs and courses in the arts and humanities. Furthermore, if production quality standards are to be implemented, guidance must be offered to instructors who do not have the resources or technological aptitudes to create “high quality” course material representing the UCLA brand.

**Impact on Faculty/TA Workload and Compensation:** This important issue comes up frequently and needs to be clearly addressed, before the CCCE can support this policy. If the general trajectory seems to indicate that more and more instruction will be offered in an online format, we must be mindful of how this affects faculty and teaching assistant workloads. While not necessarily within the purview of this task force or the CCCE, recommendations should be offered and guidelines established addressing these important issues. Depending on the situation, an online course could either increase or decrease the workload of the instructor. Generally, the time commitment required by a faculty member and the TAs involved in developing and implementing online instruction substantially increases. How will departments count this online course in relationship to existing faculty workloads, and if, for example, the online course counts as 2 regular courses how would the increased FTE expenses be covered, or the decrease in “regular” courses be dealt with by a department? With regards to already developed online courses that require a TA/GSR, commensurate compensation that is built into the current step regulations governing TA/GSR pay levels should be investigated, especially if they will be required to become proficient in certain technologies.

**Non-matriculated Students:** The policy mentions that income from non-matriculated students will be used to recoup some or all of the production costs for online courses. As everyone is aware, concurrent enrollment is the process that non-matriculated students use to access UC courses and UNEX is the entry point for non-matriculated students to enroll in concurrent courses—for both online and in-class formats. UNEX shares revenue from concurrent enrollments with campus departments on an annual basis. Modification of the formula for revenue sharing for online courses must be explored in order to allocate to each campus department an accurate portion of the revenue to support the production, faculty and administrative oversight of these courses. Additionally, some faculty members do not want to accept non-matriculated students into their courses - admission is granted at the discretion of
individual faculty. Therefore, depending on how important admission of non-matriculated students is to the success of online programming, expectations for the percentage of concurrent participants in each course need to be evaluated and agreed upon beforehand.

Finally, the committee identified the need for clearly articulated guidelines regarding cross-campus rights for matriculated/non-matriculated students to be able to enroll in online courses and specifically to obtain credits and degrees. Policy is unclear on this important issue and needs to be developed both on individual campuses and system-wide.

Intellectual Property: This complicated issue is fraught with legal and academic freedom implications. CCCE members had strong opinions regarding the topic that can be summed up as follows - The standards by which intellectual property rights are assigned should be consistent, regardless of whether the course is delivered online or in the traditional classroom setting, and regardless of whether it is offered on Campus or via UNEX or UCOP. The rights to derivative works developed as part of the instructor’s broader research, scholarly, and/or creative output should remain with the instructor. Any policy that defines specific intellectual property rights should allow instructors to be creative and inventive in the development of course materials/methods, with the assurance that they do not automatically become property of the University.

The Committee on Continuing and Community Education is appreciative of the opportunity to review this draft proposal and hopes these comments are useful.

Sincerely,

Barbara Drucker
Chair, Committee on Continuing and Community Education

Cc: Mark Kaminsky, Policy Specialist, Academic Senate
MEMORANDUM

FACULTY EXECUTIVE COMMITTEE  
College of Letters and Science

To: Linda Sarna, Chair, Academic Senate
Fr: Michael Meranze, Chair, College Faculty Executive Committee
Date: February 27, 2013

Re: College FEC response to the report of the taskforce on a proposed Online Education Policy

The College Faculty Executive Committee (FEC) discussed the report of the taskforce on Online Education at our February 15, 2013 meeting. After an extensive and wide-ranging discussion of the proposal, the FEC voted to oppose the proposal’s recommendation to establish an administration-controlled office for online instruction (10 approve, 0 oppose, 0 abstain). We strongly encourage the Academic Senate to also oppose the taskforce’s recommendation, and recommend that the Senate develop its own proposal for organizing and overseeing the development and evaluation of online courses at UCLA. Although we share the taskforce’s conviction that the campus needs to take steps to provide oversight to the development of online education, we conclude that the approach they suggest will not secure their aims and will institute fundamental and inappropriate changes in the relationship between faculty, instruction, and the administration surrounding matters of curriculum. I recount here a brief summary of our key concerns and then offer the FEC’s suggestions for how better to proceed.

1. We agree with the taskforce that the campus should consider organizing an office for online education. But, we think that the formulation of the taskforce is muddled and is likely to simply increase administration without benefit to instruction. At one point the taskforce refers to the proposed office as a “clearinghouse for institutional program, technical and policy requirements” a task that we see as appropriate. The addition of “investment management” that follows, however, transforms the office from an information clearing-house to an entity that establishes curriculum.

2. This transformation is inappropriate in part, because the taskforce intends the office to have “a governing board including Academic Senate and administrative members.” In our opinion, this is a dangerous infringement into the authority of the faculty and the Academic Senate. We refer to Regental Standing Order 105.2 (b), which establishes that “The Academic Senate shall authorize and supervise all courses and curricula offered under the sole or joint jurisdiction of the departments, colleges, schools, graduate divisions, or other University academic agencies approved by the Board...No change in the curriculum of a college or professional school shall be made by the Academic Senate until such change shall have been submitted to the formal consideration of the faculty concerned.”1 For this reason, we strongly oppose the creation of a curriculum organizing office that is overseen by a committee other than an Academic Senate committee. To do otherwise would be to violate a fundamental authority of the Senate. While we recognize there is an important administrative role in the facilitation of online education, we urge the Academic Senate to insist on its authority over curriculum as well as the methods of instructional delivery. Indeed, members were struck by how little

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1 See http://regents.universityofcalifornia.edu/bylaws/so1052.html
emphasis was placed on educational importance in the list of criteria for investing in digital education. The FEC believes that that question must remain front and center. That the taskforce report placed so little emphasis on this issue is another indication that the deployment of digital education should remain under the authority of the Senate.

3. Members also found the discussion about the nature of online education and the definition of students to be unhelpful. Despite the taskforce’s intention to demonstrate the broad use of technology in education, the report’s definition ends up minimizing the use of technology in anything but totally online courses. As a result, the report fails to grapple with the extent to which digital tools are already in use and of the importance of the Office of Instructional Development in helping to organize those tools. We were puzzled by the taskforce’s attempt to define students—a category that normally refers to those enrolled in academic courses and programs. We are concerned that the effort was designed to conflate UCLA and UC students with those who were not matriculated at the University. If indeed the taskforce was attempting to create a matrix for including both UC and non-UC students, we view this effort as a mistake. It confuses different aims and raises all of the same problems that have plagued UCOE’s efforts. UCLA does not need to copy UCOE. The remarkable failure of UCOE in its effort to enroll non-matriculated students should be a red flag.

4. Members were also concerned with the discussion of intellectual property rights, which seemed both contradictory and inadequate. We believe the report provides little or no protection for the intellectual property rights of faculty. Although the report notes that “Under the UC Policy on Ownership of Course Materials, ownership of the rights to course materials created by Designated Instructional Appointees (DIA) without the use of Exceptional University Resources are owned by the DIA unless otherwise indicated in a Commissioned Work Agreement” the report then effectively revokes this recognition. On the one hand, there is no definition of “exceptional university resources” (which form of online would not fall under that category?), and then in its proposed Commissioned Work Agreement, it expects that faculty will sign away their control over course materials to the Regents. In effect, the proposal will hire faculty to create course material that can then be used and modified at the discretion of the University. Members found this aspect of the report to be alarming. One member, in fact, wondered if the removal of “intellectual property” from the taskforce’s name was a result of the fact that it declined to protect the intellectual property of faculty.

In lieu of the taskforce’s recommendations, the FEC would like to offer the following suggestions on how the Senate might begin to formulate their own policy for oversight of online education.

1. We agree with the taskforce that there needs to be a central clearinghouse for information and advice for how faculty can incorporate online elements into new and existing courses, including but not exclusively, wholly online courses. We believe such an office should be informative and advisory. Indeed, we are not sure why additional resources cannot simply be added to the Office of Instructional Development (which already provides many such services), rather than creating another administrative office on campus, especially during a period of extreme financial retrenchment. At least several members, although voting in support of the FEC’s general position, wished to express strong opposition to the establishment of any separate office for online education.

2. The FEC believes that the expansion of technology in instruction must remain under the control and supervision of the Senate as is established by the Regents Standing Orders and as is the case with other curricular decisions. Although the administration has an advisory role to play in the approval and organization of curricula, the power resides with the Senate. Rather than cede this responsibility, the FEC urges the Division to establish a committee to oversee this area of the curriculum, or at the very
least, provide appropriate guidance to existing committees that oversee undergraduate and graduate curricula.

3. If the Senate decides to establish a committee to oversee online education, the FEC recommends an appropriate, but minor, role for the administration. First, we recommend that the administration establish a modest and transparent budget for the campus’ development of online education. Second, we recommend that the Office of Academic Planning and Budget provide the committee with detailed evaluation of the instructional costs of different courses. Finally, we recommend the Office of Analysis and Instructional Management provide the committee with information and advice on the curricular points that could be helped most effectively by online resources (e.g. so-called bottleneck courses). We believe it would be appropriate for members of AIM and ABP to be present at committee meetings in an advisory capacity only.

4. Once a structure and budget are established, the FEC recommends that funds be distributed in a manner similar to the way COR distributes research funds (e.g. in response to applications from instructors or groups of faculty). We believe this process is fair and can be tied to existing course approval processes (e.g. the overlap between approval as GE and simple FEC approval). Such a committee would be in an ideal position to evaluate the courses in terms of either their ability to provide students with learning experiences unavailable in more traditional face-to-face settings or in terms of the assistance they could provide to students as they move through their programs. We also imagine that in some circumstances moving courses online may enable departments to deploy faculty resources in the smaller face-to-face settings so crucial to achieving the finest education in a research university.

5. The FEC also strongly urges the Senate to safeguard the intellectual property rights of faculty. Once created, the courses and course materials should remain the property of the instructor or instructors. Faculty may, and indeed we would encourage them to, choose to share resources, but the use and reuse of materials should not be given to the Regents because they have provided a digital platform for the presentation of course material. The creative and intellectual work that is done in the elaboration of course themes, ideas, and evidence must remain with the creators.

6. We recognize that there is a creative process that designers, faculty, and staff engage in during the creation of digital education, but the University's investment in the process, albeit substantial, should not justify the seizure of intellectual property from faculty.

Again, we want to make clear that we are not opposed to the development of online education. Indeed, as a leading research university, UCLA is well-positioned to move confidently into new areas of instruction. But, support for the principle does not translate into the support of the recommendations of this report. We urge the Senate to consider opposing the recommendations contained in this report and to forge ahead with its own solutions.

As always, our membership appreciates working with the Senate on important matters like this. You are welcome to contact me at meranze@history.ucla.edu with questions. Kyle Stewart McJunkin, Academic Administrator, is also available to assist you and he can be reached at (310) 825-3223 or kmcjunkin@college.ucla.edu.

cc:  Jaime Balboa, Chief Administrative Office, Academic Senate
     Lucy Blackmar, Interim Associate College Dean, College of Letters and Science
     Kathleen Copenhaver, Associate Registrar, Registrar’s Office
February 27, 2013

Linda Sarna, Chair, UCLA Academic Senate

RE: Report from the On-Line Education Task Force

Dear Linda,

Thank you for the opportunity to opine upon the report from the taskforce for Distance Learning Intellectual Property, renamed as the Online Education taskforce at the University of California. I have shared the proposal with the School of Nursing Faculty Executive Committee and the Faculty. The School of Nursing has a number of concerns about the proposal suggested in the report of the task force including: 1. Development of an additional administration unit to provide approval and oversight for all on-line courses; 2. Failure to protect intellectual property of faculty that might develop on-line course materials, 3. Inclusion of non-matriculated students in the approach, as they are not matriculated students they should be dealt with in a separate proposal, and 4. Concerns about this new unit allocating costs/revenues from new on-line programs, especially self-supporting programs, to themselves or the campus general fund and allocating funds away from departments and units.

The original charge to the task force was to address issues related to intellectual property for on-line course materials and faculty use of course products as well as how new self supporting programs costs and revenues would be shared across faculty, units, and the campus in general. We don’t believe the task force has addressed the original charge related to intellectual property and in fact, has further confused this issue. We continue to have concerns about protecting faculty intellectual property with development of on-line course materials and this report does not address these issues. Specifically the description of development of on-line courses by Designated Instructional Appointees is confusing and use of a commissioned work agreement by all Designated Instructional Appointees to specifically acknowledge that copyright is owned by the University suggests that the faculty that develop on-line course materials will lose their intellectual property rights.

The task force proposes development of an oversight unit with academic senate and administrative personnel. This new unit would be responsible for institutional programs, technical and policy requirements, institutional investment management and production/delivery capacity and capability. This is of concern, as we believe faculty should be the owners of curriculum and should be free to develop and teach courses without administrative oversight at this level. New courses are approved by faculty in the department/unit and then are reviewed for approval by the academic senate. There is no rationale for another level of administration, further the use of
this new administrative unit as an additional level of review for proposed on-line courses, including pedagogy is not viewed favorably. The proposed office for on-line education adds an unnecessary additional administrative level that has too much power in relationship to approval and development of these on-line courses. And for all this new administration, it does not appear that faculty or departments/units receive any benefits.

The inclusion of non-matriculated students in this report increases the level of confusion. The approach for matriculated students and on-line courses will by necessity be different than the approach that may be used for non-matriculated students. The report does not address these differences in terms of approach and on-line courses/education may differ for these groups.

Finally, we have concerns about revenue allotment. From the report, it appears that the new administrative unit would determine who gets any revenues and how much revenue is distributed. It is clear that the “investment” fund of the new On-line education unit would receive a portion of any revenue from an on-line course. What is not so clear is how the department/unit benefits from this arrangement.

We support development of on-line courses, use of on-line materials for new courses, existing courses, and as self-supporting programs. The report from the task force on on-line education creates a new administrative unit that increases the bureaucratic burden of developing on-line course materials while delivering minimal benefits.

Thank you again for the opportunity to review and opine on this matter. Please contact me if clarification or elaboration is required.

Sincerely,

Barbara Bates-Jensen
Faculty Executive Chair, School of Nursing
Memorandum

February 28th 2013

To: Executive Committee, Academic Senate

From: Diana Messadi, DDS., MMSc., DMSc
Chair, UCLA School of Dentistry
Faculty Executive Committee (FEC)

Re: UCLA Policy for Online Instructions

Thank you for soliciting our input regarding the new UCLA policy for online instructions. The School of Dentistry FEC met on February 27th 2013 and unanimously approved, in principle, the proposed new policy for online instructions. We look forward for more clarifications regarding the non-matriculated courses and the intellectual property issue regarding these online courses. Currently, the School of Dentistry does not offer any online distant learning courses, as the majority of our courses are hands on, patient care clinical courses. Faculty members are exploring the possibility of developing online distant learning courses within their disciplines that will enhance the knowledge and skills of our students and the dental community.
TO: Linda Sarna, Chair  
Academic Senate

CC: Jaime Balboa, CAO  
Academic Senate

FROM: Alan J. Laub, Professor  
Chair, HSSEAS Faculty Executive Committee

DATE: February 27, 2013

RE: ONLINE EDUCATION TASKFORCE

The HSSEAS FEC met on Feb. 22, 2013 and discussed the Online Education Taskforce (Atchison) report. While we support the concept of online education, and indeed find many of the questions raised in Kathryn Atchison's Dec. 20, 2012 letter to be cogent, we are opposed to the draft report as written.

To summarize, our principal objections are the following:
1. The concept of adding a single Office as "clearinghouse for institutional program, technical and policy requirements, institutional investment management, and production/delivery capacity and capability" at a school as large and diverse as UCLA is, taken at face value, absurd. This would have been recognized immediately by having had sufficient faculty input to the report. This is a big step for the university, one that requires careful deliberation and broad input from all constituencies.
2. The issue of ownership and copyright of "online" courses requires a much more in-depth look. Also, the use and re-use or rebroadcast of such courses demands careful analysis as well. The faculty have rights which are being ignored.
3. Who and what level or type of student is online education being directed at? It makes a huge difference whether online courses are for making up undergraduate deficiencies, or for graduate education, or what? Some specific examples would be very helpful.

Further comments by John Villasenor (EE) and Milos Ercegovac (CS) are attached.
Hi all - I've explained at the end of this mail why the issue I am raising matters. But, first, the issue:

The definition of "commissioned work" that UC appears to be using at least under some circumstances, which is:

"A commissioned work is a work produced for University purposes by individuals not employed at the University or by University employees outside their regular University employment."


is substantially broader than the corresponding definition in U.S. copyright law. Under that law, for purposes of copyright, to fall under the "work made for hire" doctrine, a commissioned work must be in one of nine specific categories:

"a contribution to a collective work, as a part of a motion picture or other audiovisual work, as a translation, as a supplementary work, as a compilation, as an instructional text, as a test, as answer material for a test, or as an atlas."

(see http://www.law.cornell.edu/uscode/text/17/101 under definition of "work made for hire").

I think that there's an argument to be made that the *content* of an online course is at least partially distinct from the audiovisual representation of that content. And, as a result, I don't know that I'd agree that the "Intellectual Property Ownership" clause in Exhibit A would of necessity cover all of the work product of a faculty member who develops a course under that agreement. Yet, that agreement does not cleanly recognize that distinction. Instead, it has what can be called a "clean-up clause" in 4c stating that:

"To the extent that the Commissioned Work is not properly characterized as a commissioned work or work-for-hire, [Name] grants to The Regents all rights, title and interest in the Commissioned Work . . ."

Now, if you are reading my mail and wondering, "why should I care?", here's why: Because whether you have the right to reuse, in a non-UCLA setting, online course material you developed for UCLA under this agreement depends on whether

1) *you* are the owner of the copyright to that material, with UC as a licensee (see section 4(c) of "UCLA On-Line Instruction Commissioned Work Agreement")
or

2) *The Regents* are the sole owner of the copyright (see section 4(b) of "UCLA On-Line Instruction Commissioned Work Agreement")

If you are not the owner of the copyright, the Regents would have the right to prevent you from re-using it without their explicit permission.

If it were up to me, I would prefer that the "UCLA On-Line Instruction Commissioned Work Agreement" be modified to avoid potential downstream confusion over these issues.

Thanks,
John
Computer Science Department Comments and Opinions on the draft of the UCLA Policy for Online Education

HSSEAS Computer Science Department faculty is highly concerned and critical about the proposed UCLA policy for online education. These concerns are articulated in the comments quoted in this memo, and were voiced during a faculty meeting about the proposed UCLA draft. Broader issues of online education were also discussed at the meeting finding that the proposal falls short in vision regarding UNiversity role in education.

Briefly, we find the policy not well thought out, proposing changes that are not justified by an investigation or experience in online education. The task force should have consisted mainly of faculty, with administrators serving in advisory roles. In particular the proposed reversal of authorship rights from faculty to the Regents is unacceptable and if, implemented following a corporation-like language of agreements, it will profoundly affect the Campus ability to attract new faculty and engage faculty in online education. The emphasis on commissioned work as a vehicle to create online courses effectively sidelines faculty and gives a leading role to the proposed office which focuses on revenues. While faculty has oversight of a commissioned course, this not being a regular course, adds additional load and challenges in interacting with potentially non-UCLA faculty. The policy opens door to replace a regular faculty by an outside commissioned work contributor based on cost savings. These are just examples of issues that need to be addressed.

A proposed creation of a new omnipotent office to control online education efforts on Campus is premature and flawed in many respects. If a goal is to reach more non-matriculated students, why not expand UCLA Extension? They have been active in online delivery of courses since 1995. At least, their input should have been included. The proposed office will be in charge of resources for online education and provide technology. What is the role of the Office of Instructional Development? Bypassed in online education? Restricted to on-Campus courses?

The School has a successful MS online program, well-integrated with a regular program. It enables off-campus students to earn degrees and provides much needed resources to the School. Will it be allowed to continue? Why aren't there any comments in the policy about existing online programs?

The parts of the draft discussing the IP issues, the Copyright rules, and "Commissioned Work" have drawn strongest criticisms. Here are some comments that represent criticisms of CS faculty:

"I'm quite concerned about the copyright aspects. The default ought to be as before: you own your own work, and the University gets ownership only in exceptional circumstances. The proposal would reverse this: it would change the default to be that the University owns your work, and you get ownership only in exceptional cases. That's a power grab that we should resist strenuously."
"… the approach taken by the Regents is objectionable and has many weak points. But my main objection is the predatory rather than cooperative attitude toward the faculty, which will impair their collaboration and their contribution to the overall effort.

If I read the document correctly, the word 'predatory' is deserved inasmuch as:

Under the current policy, ownership of course materials belongs to the instructors (page 5 top).

Now, once the course lectures are captured (as per the definition at bottom of page 2) the video/audio material becomes property of the university (without any additional compensation for the instructor). Therefore the university and the departments will have every incentive to force faculty to allow the capturing of their lectures. (Then they will be able to provide courses with fewer instructors if any--more TAs will do. For instance, we could do that for our CS111 class.) Not a major problem for us, but will a professor coming up for tenure be able to resist this pressure!?

Now, say that the professor agrees. Then the lecture video becomes copyrighted material. Thus our instructor will NOT be able to:

1. post segments of the course on YouTube,

2. produce any online course that significantly overlaps with this---even during summertime, after retirement, after he/she has moved to a different university.

Even more interesting is the position of TAs who provided exercises and discussion materials for the course--they had to pay tuition for that privilege?"

".. faculty members should be given an option to participate as a contributor of the online course material creation, but yet maintain the ownership of the materials (maybe at a reduced level of compensation, compared to the case when faculty's work is commissioned and owned by UCLA). Also, UCLA should review the materials before releasing them online, so that the faculty is not responsible for future copyright infringement claims."

The general vision of future education is lacking as expressed in the following comments.

"I find the issues raised in this document to be very narrow, shallow and focused on IP, revenue, etc., which are not the main issues for the future of the university."
There should be a much deeper discussion of what the university of the future should be. Instead of shallow questions about offering online courses as they exist today, what new modes of education would be best: most effective education would be the highest priority but tempered with practical issues such as cost efficiency. We talked about some different modes of combining online and in residence education which may well change the format of our existing courses as we offer them today. There may likely be differences in what is optimal depending on the type of course … lab, project oriented, etc. There is also (most likely) a difference between graduate and undergraduate education. The role of faculty, TA and student may be modified. I recommend wider discussion and some experimentation with different uses of in residence and online resources. This needs to be on a small scale and perhaps controlled through a body like the FEC but I am not sure how one gets real information without trying things."

"In an educational world that is changing rapidly, where flexibility is paramount, they propose to institute a new OFFICE (more bureaucracy, more bureaucrats), and a new POLICY, as if we didn't have enough of either already. Both Udacity and Coursera were started without a single signature of approval by any administrator. UCLA's responses to this, by creating new committees and red tape, is awkward, misguided, and ultimately counterproductive.

I would suggest that this committee (who, to the best of my knowledge, does not include anyone that has even produced any MOL course) should limit itself to issuing their OPINION, not any policy or recommendation to institute even more bureaucracy. Instituting an "office for online instruction" sounds to me like a really bad idea. In summary: an awkward document, that appears written more by lawyers, politicians, and bureaucrats, then by people genuinely interested in pushing the boundaries of education."
Hi Jaime -

The FEC for the School of Theater, Film and Television met on February 21, 2013. The committee voted unanimously to endorse the report on "The Right to Appeal Curricular Decisions".

The committee voted unanimously to oppose the "Online Education Policy" report submitted by the Online Education Task Force. The committee believes that the report lacks concreteness. For instance, it was agreed that phrases like, "exceptional university resources" need definition and clarification.

Respectfully submitted,
Joe Olivieri
Interim chair
TFT Faculty Executive Committee

Joe Olivieri
Associate Professor
Head, Undergraduate Acting
University of California, Los Angeles
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(323) 804-3979
MEMORANDUM

March 4, 2013

To: Jaime R. Balboa  
Chief Academic Officer, UCLA Academic Senate

From: Dominique M. Hanssens  
Chair, UCLA Anderson Faculty Executive Committee

The UCLA Anderson Faculty Executive Committee (FEC) met on Friday, February 8, 2013 to review and discuss the Online Education Policy as requested by the Academic Senate.

After review and discussion, the FEC provided their endorsement of the proposal, contingent upon the requested revisions and concerns being addressed:

- The document, as it is currently written, is very confusing and complex and would be difficult for faculty to interpret and to implement. Online courses should be easy for faculty to implement.
- The University needs to think about resources up front and ensure that any online education initiative of the University is appropriately resourced.
- The proposed development fee and the ownership and copyright of courses as proposed in the document are contrary to how programs currently manage these issues. If this policy were implemented, existing courses would need to be grandfathered. In terms of ownership, the question was raised as to why it could not be structured similar to what happens when a faculty member publishes a book.
- Concern was expressed that this policy would add more layers onto the course approval process and that this would limit the University’s ability to move quickly, in an entrepreneurial fashion, and be responsive to market demand. The proposed production standards would also increase the amount of time before a course could be approved and offered.
- Generally, the focus of the course approval process is on content, not delivery, and each School should be allowed to make their own decision on the appropriate method of delivery. Similar to the recent American Council of Education (ACE) decision, a course should be viewed as the same no matter how it is delivered. Hence, why wouldn’t the same approval process used for regular courses be used for online courses?
- There is a need for the University to address the intellectual property issues and to provide a resource framework for units but nothing more restrictive than that. UCLA Extension should also be included in this policy to assure that its online courses meet the same quality standards.
- The American Disabilities Association (ADA) requirements should be an added feature, not a defining one, of all online courses and included in any online course that is developed.

Please let me know if you require any further information.

c: R. Bucklin, Faculty Chairman & Deputy Dean, Academic Affairs, UCLA Anderson  
J. Olian, Dean & John E. Anderson Chair, UCLA Anderson