March 16, 2007

Professor John Oakley
Chair of the Academic Senate
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In RE: UCLA Response to Proposal for SR 694 and Proposed 695

Dear John:

Thank you for the opportunity to opine upon the Proposed SR 694 and 695. I sent the proposal to all standing committees of the Academic Senate with the invitation to opine, and specifically requested our Executive Board, Graduate Council (GC), and Committee on Continuing and Community Education (CCCE) to respond. I have attached the responses from GC and CCCE for your information; the Executive Board’s response is integrated in this letter. To summarize, UCLA strongly opposes the proposed amendments to SR 694 and the proposed SR 695.

UCLA is sympathetic with the goals stated by the Coordinating Committee on Graduate Affairs (CCGA): Senate regulations regarding graduate residency should be reviewed due to changes brought about by new technology for the delivery of instruction and the development of new education partners (both domestically and internationally). Nevertheless, we have reservations about the language proposed. Please allow me to explain.

Regarding Proposed Amendment to Senate Regulation 694

- The GC opined that, with the exception of the proposed revision to the first sentence of the first paragraph of SR 694, the proposed revisions contradict current Senate bylaws and regulations, which require that course format changes receive Graduate Council approval, specifically through the Curriculum Committee. The proposed language of Paragraph F not only provides the means for circumventing existing curricular oversight by the Council, but it clearly establishes a precedent for bypassing divisional oversight altogether (i.e., “the program shall notify the Coordinating Committee on Graduate Affairs of its intent… regardless of whether the shift has been considered by the concerned Graduate Council(s)”).
Regarding Proposed Senate Regulation 695

- The Graduate Council is sympathetic to the need to address changes in program delivery, especially with regard to the issue of faculty-student contact hours. Both the GC and CCCE found this proposal too convoluted to enact, principally due to a conflation of the meaning of ‘residency’ with ‘physical presence.’ The matter of physical location should be replaced by the current understanding of academic residency. That is to say, as long as the instruction is provided by UCLA faculty and as long as the course is approved as appropriate by the Academic Senate and given compliance with existing Senate Regulations and administrative procedures, residency has been established, regardless of the physical presence, location, or proximity to campus. The Standards and Procedures for Graduate Study at UCLA states “Students are required to complete at least three quarters of academic residence (registration and enrollment) in graduate status at the University of California, including at least two quarter at UCLA. A student is in academic residence after completing at least one course (four units) in graduate or upper-division work during a quarter.” (pages 7&9). With this in mind, the GC strongly recommends a complete revision of proposed SR 695 so that it consistently reflects a notion of academic residency based on acceptance and enrollment of the student, not physical presence.

- CCCE states that the working premise of SR 695 seems to be that on-line modes of instruction pose a threat to the educational quality of the university by jeopardizing students’ opportunities for interaction with faculty. It therefore imposes burdensome methods of evaluation and approval for online instruction in order to limit their potential damage. UCLA finds that the working assumption of the regulation is dubious at best, as the following examples make clear. The guiding heuristic: Physical Presence On-Campus + Face-to-Face Instruction = GOOD; Off-Campus + Electronically Delivered = BAD is inadequate for distinguishing between high and low quality education.

- CCCE, GC, and the Executive Board remark that the wording of the regulation suggests that totally anonymous instruction in a 900 person lecture hall, for example, should be considered unproblematic because it achieves the standard of "locally-attended classroom instruction" and "provides the opportunity for interactive contact." This is troublesome, given that the vast majority of students never speak directly with their professor, or that the professor never reads a word of their work (if writing is even required), so long as instruction is delivered "didactically" in "real-time."

- Contrary to this premise, CCCE and the Executive Board find that online instruction has already proven to be highly instrumental in many disciplines and units, while others find it less useful. Decisions about which modes of instruction are most educationally valuable should be left to the faculty in a particular field, subject to existing procedures for evaluating teaching and approving courses.
UCLA recommends, that, should further regulations be required, the following tenets be followed:

• Quality of education should be maintained by comparing the amount of learning accomplished by various modes of instruction, and picking the most effective. (Whereas this regulation effectively privileges some means and circumscribes others, without regard to subject matter or technological opportunities, and without regard to outcomes.)

• Modes of instruction at UC should be decided by various faculties, using expert knowledge of their fields. (Not promulgated through sweeping, vague, and convoluted Senate regulations whose meanings are difficult to determine).

UC already lags behind other universities in exploring and exploiting educational technology. SR 695 gives no quarter to the idea that experimentation and innovation should be encouraged at this early stage, without shackles from system level regulations. Quality control of the curriculum will be monitored through routine, Senate reviews of departments.

Thank you in advance for the opportunity to opine on this important matter.

Sincerely,

Vivek Shetty
Chair
Los Angeles Division

Cc: Maria Bertero-Barcelo, Executive Director of the Systemwide Academic Senate
    Jaime R. Balboa, UCLA Academic Senate CAO