

June 26, 2024

Debora Halbert Vice President for Academic Strategy University of Hawai'i System Office of the Vice President for Academic Strategy 2444 Dole Street Bachman Hall 204 Honolulu, HI 96822

RE: Proposed AP 5.201 Procedures for Assigning Program Names and CIP Codes for Academic Programs, letter dated June 21, 2024

Dear Vice President Halbert:

UHPA acknowledges receipt of your above reference letter. Thank you for providing the proposed AP and list of comments received through the formal consultation process with the UH Faculty Senates. UHPA has no additional questions, comments, or concerns at this time.

If you have any questions, please feel free to contact me at <u>imow@uhpa.org</u> or via phone at 808-475-0515.

Sincerely.

Jamie Mow UHPA Associate Executive Director

cc: Christian Fern, UHPA Executive Director James Kardash, UHPA Associate Executive Director Dwight Takeno, UHPA Associate Executive Director





June 21, 2024

Jamie Mow Associate Executive Director UH Professional Assembly 1017 Palm Dr. Honolulu, HI 96814

Via email to imow@uhpa.org

Re: Proposed AP 5.201 Procedures for Assigning Program Names and CIP Codes for Academic Programs

Dear Ms. Mow:

Thank you for your letter of January 31, 2024, in response to the consultation on the draft proposed Administrative Procedures 5.201.

Attached is the proposed AP and the list of comments received through the formal consultation process. Administration has addressed all concerns submitted.

You may contact me at halbert@hawaii.edu if you have any questions. Mahalo!

Sincerely,

Tulana Walkent

Debora Halbert Vice President for Academic Strategy

Attachments

Administrative Procedure Chapter 5, Academic Affairs Administrative Procedure 5.201, Procedures for Assigning Program Names and CIP Codes for Academic Programs Effective Date: XXXX 2024 Prior Dates Amended: N/A Responsible Office: Office of the Vice President for Academic Strategy Governing Board and/or Executive Policy: <u>RP 5.201</u> Instructional Programs, <u>EP 5.201</u> Approval of New Academic Programs and Review of Provisional Academic Programs Review Date: XXXX 2027

I. <u>Purpose</u>

To provide a procedure to ensure system-wide consistency in the naming and assigning of program codes for academic programs and to adhere to national standards in data reporting in order to comply with RP 5.201 and EP 5.201.

II. Definitions

- A. Classification of Instructional Programs (CIP): A taxonomic scheme that supports the accurate tracking and reporting of fields of study and program completion activity developed and maintained by the U.S. Department of Education's National Center for Education Statistics. The CIP consists of a CIP code, CIP title, and CIP description.
- B. CIP Code: The Classification of Instructional Programs (CIP) code associated with the Official Program Name that is designated prior to Board of Regents (BOR) approval.
- C. CIP Title: The academic program title connected to the designated federal CIP code. This title is taken from the federal CIP database and may differ slightly from the BOR-approved Official Program Name.
- D. CIP Description: The brief narrative provided by the National Center for Education Statistics that is attached to each individual CIP code.
- E. Official Program Name: The name of the program, including parenthetical information, approved by the Board of Regents at the provisional program stage. It is the official name for purposes of the Board of Regents-conferred credentials and is used in University publications.
- F. Program Code Request (PCR): Includes a request for the program name and program code (consisting of the degree type, major name and major code), CIP Code, effective term, curriculum, required documentation, and approvals.

G. Student Data Oversight Committee (SDOC): A Data Governance Committee subcommittee focused on improving data quality and access as well as providing guidance on future directions, priorities, and uses of student Institutional Data Systems. The SDOC has the authority to make decisions on student data issues and make recommendations to the Data Governance Committee on policies and principles related to data management and use (EP 2.215 Institutional Data Governance). SDOC manages the principles for program name, program description, and the U.S. Department of Education's Classification of Instructional Programs (CIP), and code assignment.

III. Administrative Procedure

- A. The CIP policy adheres to the following basic principles, is further clarified in the SDOC Program Code Policies:
 - 1. National alignment:
 - a. The program name and CIP code should align with the national database of CIP codes.
 - b. The program curriculum alignment to the national definition is the defining factor in choosing a CIP code.
 - c. The program name, contents and conferred degree should be in alignment for students' understanding.
 - d. A significant change to a program will generate a new program code and require President's approval. A change in CIP code, program name or substantial modification of the curriculum would be a significant change. A non-significant change would be an industry-wide or institution-wide change to remain current with terminology or federally mandated CIP code changes
 - 2. UH System alignment:
 - a. If a similar program exists or uses the same Official Program Name in the UH System, then the same CIP classification shall be used.
 - b. If the program name or CIP code is already in use within the UH System, the party proposing a CIP code for a substantially different program may not use the same code.
 - c. The Official Program Name, content, and conferred degree (if applicable) should align to ensure coherency with students' understanding of the credential and the program learning outcomes.
 - d. The Official Program Name, the assigned program code, and CIP code shall be the same in all public documents.

- In the event the CIP classification and Official Program Name do not align, supplementary documentation for consideration may include recommendation/guidance from an applicable federal agency or accrediting body; peer institution CIP classification for similar programs; and/or applicable and citable non-industry/trade-specific higher education publications such as *The Chronicle of Higher Education*.
- B. Requesting a CIP Code for a New Program.

The approval of a CIP code for a new program shall go through the relevant campus approval process before the request is forwarded to the Institutional Research, Analysis and Planning Office (IRAPO).

The steps are as follows:

- 1. A campus seeking to develop a new program shall notify IRAPO regarding the need for a CIP code when submitting the provisional program proposal.
- 2. The campus completes a "Program Code Request (PCR) New" form and indicates the CIP code in the "Additional Comments" section.
 - a. UH Community College campuses shall submit requests through the Office of the Vice President for Community Colleges (OVPCC).
 - b. Four-year campuses may submit requests directly to IRAPO.
- 3. Based on the campus's PCR, IRAPO reviews the proposed Program Name and requested CIP code and CIP title while consulting with campuses as needed.
- 4. The request is reviewed for recommendation by the Council of Chief Academic Officers (CCAO), SDOC, the Office of the Vice President for Academic Strategy (OVPAS) or the OVPCC.
- 5. The OVPAS endorses the Authorization to Plan (ATP) request.
- 6. IRAPO approves the PCR and the campus's requested CIP code after consultation with the campus if needed. For advanced degrees, IRAPO will approve the CIP code based upon the recommendation of the Chancellor/Provost.
- 7. IRAPO coordinates the implementation of the new program addition into the student information systems (Banner and DAPIR/ODS) after the CIP code for the new program has been approved.

- C. Requesting a Change in Program Name, Program Code, or CIP Code
 - 1. Requests involving significant change: Name/Code/CIP changes that reflect a significant program change are handled according to the requirements for new program authorizations as outlined in EP 5.201.
 - a. When making significant changes, because the CIP code is the primary means of federal program reporting (Integrated Postsecondary Education Data System--IPEDS), the source used by college selection organizations (e.g., College Navigator, College Board), and because changes may impact financial aid and student visas, the implications of the program's CIP code assignment should be taken into consideration.
 - b. The Program Request Process is as follows:
 - The campus submits a completed "Program Code Request (PCR) Modification" form with the CIP code in the "Additional Comments" section.
 - 2) If the modified program name, program code, or CIP code is used by other programs in the UH System, approval must be obtained from all affected parties by the requesting campus.
 - IRAPO reviews the program request for compliance with applicable Regents Policies and Executive Policies and requests modifications, if needed.
 - 4) For advanced degrees, IRAPO will approve based upon the recommendation of the Chancellor/Provost.
 - 5) The request is reviewed for recommendation by SDOC and either the OVPAS or OVPCC.
 - IRAPO then coordinates the implementation of the campus's change(s) in the student information systems (Banner and DAPIR/ODS) and validates correctness.
 - 2. Requests involving non-significant change: Requests to change a program name to remain current in terminology but not entailing any significant change in the program are made to the President. IRAPO then coordinates the implementation of the campus's change(s) in the student information systems (Banner and DAPIR/ODS) and validates correctness. Maintaining currency in terminology means:
 - a. A substantial number of a campus' peer and benchmark institutions have adopted the program name change or
 - b. The change follows the recommendation/guidance from an applicable federal agency, accrediting body, and/or industry consortium.

D. If policy-related changes are made to the CIP process, these changes will be introduced by the OVPAS in conjunction with the OVPCC; IRAPO; Provost/Chancellors of impacted campuses; and reviewed by the SDOC and/or CCAO.

IV. Applicable University Policies

- A. Regents Policy 5.201 Instructional Programs
- B. Executive Policy 5.201 Approval of New Academic Programs and Review of Provisional Academic Programs
- C. Executive Policy 5.205 Academic Programs Definitions and Guidelines
- D. Executive Policy 2.215 Institutional Data Governance
- E. Community College Policy 5.203 Program Credentials: Degree and Certificates

V. Delegation of Authority

There is no administrative specific delegation of authority.

VI. Contact Information

Institutional Research, Analysis and Planning Office (IRAPO) Telephone: (808) 956-7532 <u>irapo@hawaii.edu</u>

VII. <u>References</u>

EP 5.201

U.S. Department of Education's National Center for Education Statistics (NCES): <u>https://nces.ed.gov/ipeds/cipcode</u>

VIII. Exhibits and Appendixes

Student Data Oversight Committee (SDOC) Program Code Policies

Approved:

_____<signature>_____ David Lassner President

<Date>

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| Campus SECTIO Purpos Comme Rationa | e SECTION II: Definitions nt/ Comment/Rationale | SECTION III: Administrative Procedure Comment/Rationale | SECTION IV: Applicable University Policies | SECTION V: Delegation of Authority Comment/ Rationale | Other Comments | OVPAS Response |
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| UH Manoa | | Section III.1.A. There is a typo in an important sentence. "If a similar program exists or uses the same Official Program Name in the UH System, then the same description and CIP code should shall be used." I believe that the word "should" must be removed. | | | | We have made relevant changes to policy. |
| | | I am not sure why the CIP process should be exclusively in the hands of the VP of the CCs and not also the CEOs of the 4 year campuses. Maybe I am misreading this sentence? Maybe the presence of "Office of the Vice President for Community | | | | |
| UH Manoa | | "the same description and CIP code should shall be used." | | | | We have made relevant changes to policy. |
| UH Hilo | | needs to be should or shall, but not both B.3: Sometimes degree/program names change during the Provisional Program approval process, is it too early to assign the CIP and Name officially at the time of ATP approval? Would it be better to consult with IRAPO at the time of ATP and the Official Name and CIP assigned after the Provisional Program Approval by BOR? | | | | B3: We edited per this recommendation C.1.b.2: edited to clarify by the requesting campus. |
| | | C.1.b.2: Can we specify that the requesting campus must seek out approval from all impacted parties? Or is this meant to be | | | | |
| UH Hilo | | interproval from all impacted parties? Or is this meant to be | | | Refer to Karen Pellegrin's email dated 1/26/24, Response to requests for | |
| | | | | | consultation. See below for details | |
| UH Manoa No suggestion or comment: | the CIP code is _not_ designated prior to the BOR approval. We are unclear on how to read this sentence from a grammatical standpoint: is the CIP code designated prior to approval - or - is the Official Program Name designated prior to BOR approval? II.E. Suggested wording: Official Program Name: The name of the program, including parenthetical information, approved by the Board of Regents at the time of its provisional approval. It is the official name for purposes of Board of Regents- conferred credentials and is used in University publications. Reasoning: Because "established" and "provisional" are terms already used, | III.A.1. sections a-d. Suggested wording for clarity and consistency and accuracy: a. The program name and the CIP code, title, and description shall align with the CIP national database. b. The program curriculum alignment to the CIP definition, as established by the National Center for Education Statistics, is the defining factor in choosing a CIP code and CIP title. c. Academic programs with the same content as programs offered at other institutions nationally must use the same program name when possible. d. Academic programs with content that is different from existing program nationally must use a different program name and CIP code. III.2.a. Suggested wording for clarity, consistency, and accuracy: If a similar program exists or uses the same Official Program Name in the UH System, then the same CIP classification shall be used. III.2.b. Suggested wording for consistency and clarity because the CIP classification contains the code, title, and description (these cannot be and are not separated) : If the program mamo or CIP code is already in use within the UH System, the party proposing a CIP code for a substantially different program may not use the same code. III.2.c. Suggested addition because CIP codes exist for nondegree types of programs (e. g., non credit) so "conferred degree" is not always applicable. The Official Program Name, content, and conferred degree (if applicable) should align to ensure coherency with students' understanding of the credential and the program learning outcomes. III.3. Suggested wording for clarity, conciseness, and accuracy: | No suggestions | No comments | A main concern: The campuses should decide their CIP codes in consultation with and in harmony with other UH institutions and nationally. This is very important to UH Manoa. UH System Offices are not in the best position do make this campus decision. A GDoc with these changes tracked and comments is available. | Edits have been made per track change version shared. |

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| | | | | | t F | AP 5.201 Academic Programs Names and CIP Codes: Faculty Congress requests that this policy be postponed until it can be made clear what the impact will be on UH Hilo's existing programs and students as well as future implications, with additional time for consultation and feedback after receiving this clarification (see details below from the draft meeting minutes) | |
| | | | | | c s c | Member raised concerns about implications for standardizing program names. CIP codes don't seem as important, but policy seems to suggest we need the exact same official program names. This could be a major change to the names of some of our programs. Worried that UH Hilo will have to rename all of its programs to match UH Manoa. Need clarity on how this policy would affect us. | |
| | | | | | c a N | A member agreed and added: If program names aligned, how long will it be into course names also need to be aligned? Or other curriculum matters need to be aligned? We have differences in Hilo, for instance our psychology program – will Manoa dominate? | |
| | | | | | c c a ii | Member noted that there is some wiggle room – policy says "In the event the CIP code, CIP title, and Official Program Name do not align, supplementary documentation for consideration may include recommendation/guidance from an applicable federal agency, accrediting body and/or industry consortium; peer institution CIP classification for similar programs; and/or applicable citable explored agency. | I have been working with IRAPO to finalize comments associated with the Administrative Procedure on CIP codes and am also cc'ing Director of Institutional Research and Planning Kara Plamann Wagoner on this email. She may have additional clarification. |
| | | | | | N | Member noted that policy says CIP code and name should come from national center for educational statistics. Less clear about the program name. | Thanks for sending along your comments regarding the CIP administrative procedure. This administrative procedure emerged because IRAPO needed guidance for when and how to approve changes to CIP codes requested by one campus when those CIP codes and course and program names are shared across the system. We already have systematic sharing of course names, course numbers, and program names. CIP codes are typically assigned to a program based upon the alignment of the curriculum with the specific CIP code when the program is created and we do not intend to reassign these. However, we do need guidelines for when programs request changes. |
| | | | | | t a | Member commented that this is a serious issue, and it's unclear how it would affect our programs. No language in policy excluding existing programs – that seems to be the focus. Sometimes program name can be a factor for choosing which campus to attend. For instance Manoa has no computer science department – theirs is called "information and computer science" which sounds quite different to students, employers, etc. | |
| | | | | | | | For example, my home department of political science may have a CIP code for Political Science and Government, General (CIP 45.1001) but decide that its curriculum actually better reflects Political Economy (CIP 54.1004). Right now we have no procedures in place for the department to make that change or for criteria that should be used for IRAPO to do it |
| | | | | | s | Chair invited a motion to request clarification of the impact on our programs and students and to request that policy implementation is postponed until clarity is provided with additional time to review and provide feedback. | |
| | | | | | | | We are developing procedures in writing to help IRAPO when a program submits a program name change or CIP code change so that we are sure the impact of that change will not have negative impacts on other campuses. The intent of this procedure is to curb some of the issues that have been raised when UH Manoa has requested a CIP code change without adequate consultation with other campuses rather than develop a process where Manoa decides for everyone. |
| | | | | | | | I've tried to answer the concerns raised below (your questions in bold): Implications for standardizing program names. Policy seems to suggest we need the exact same official program names. This could be a major change to the names of some of our programs. Worried that UH Hilo will have to rename all of its programs to match UH Manoa. Need clarity on how this policy would affect us. |
| | | | | | | | There will be no renaming of existing programs to match UH Manoa. |

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| | | | | | | | However, we already have standardized names for many programs systemwide (think political science or geography or psychology). The intent is to be sure that where there is already alignment that consultation and agreement is reached prior to changes that will |
| | | | | | | | impact everyone across the system. For example, UH Manoa changed Geography to Geography and Environment several years ago. This move had ripple effects across the UH System where other Geography programs exist. The name change required additional systemwide articulation of courses |
| | | | | | | | that had been similar across the system but now had different names, and of course other programs could change if they so desired If program names aligned, how long will it be into course names also need to be aligned? Or other curriculum matters need to be aligned? We have differences in Hilo, for instance our psychology program – will Manoa dominate? |
| | | | | | | | We already have common course numbering across much of the 100 and 200 level courses. Examples – English 100, Chemistry 161, etc. What we are trying to avoid with this procedure is what happened when Manoa's accounting program changed the course |
| | | | | | | | names of several 100 level courses but kept the numbers the same. What had been aligned and articulated systemwide was now out of alignment because the same course number reflected different subject matter. So, we are trying to keep from having Manoa make alterations without systemwide consultation. |
| | | | | | | | The key is to be sure that if the course isn't the same, then it has a different number. That way there will not be confusion and it will be easier to deal with transfers when necessary. |
| | | | | | | | We understand that Hilo's psychology department will have different courses based upon faculty expertise than does Manoa's. We want to be sure they do not share the same course names and numbers – but nobody is going to be forced to align existing courses. |
| | | | | | | | Q: What is a program? Is this the department? How about certificates? A program is a course of study as defined in EP 5. 201: "An academic program is any sequence of courses or instructional activities required to complete a specific degree, inclusive of required coursework within the major, concentration/specialization, and minor." |
| | | | | | | | Basically, each program has a CIP code attached to it. This policy is really focused on the CIP code. |
| | | | | | | | Member noted that there is some wiggle room – policy says "In the event the CIP code, CIP title, and Official Program Name do not align, supplementary documentation for consideration may include recommendation/guidance from an applicable federal agency, accrediting body and/or industry consortium; peer institution CIP classification for similar programs; and/or applicable citable publications." |
| | | | | | | | This language is included because of issues when a department wants to change its CIP code to a STEM code to attract more international students but they are not intuitively a STEM program. For example, Manoa's Department of Economics wanted to use an econometrics CIP code for its PhD program but keep the name Economics for the program. IRAPO argued that if they wanted to be an econometrics program then they should change their name to align with the CIP code request. The department argued that |
| | | | | | | | other economics programs across the country were making this change in CIP without changing their name. They provided the data to support their request. Member noted that policy says CIP code and name should come from national center for |
| | | | | | | | educational statistics. Less clear about the program name. Program names align with CIP codes except as noted in the above answer. The National Center for Educational Statistics is where CIP codes are located. We try to align these with program names but there is not always exact alignment and so then we try to be close. |

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| | | | | | | | Member commented that this is a serious issue, and it's unclear how it would affect our programs. No language in policy excluding existing programs – that seems to be the focus. Sometimes program name can be a factor for choosing which campus to attend. For instance, Manoa has no computer science department – theirs is called "information and computer science" which sounds quite different to students, employers, etc. |
| | | | | | | | The intent of this administrative procedure is to provide IRAPO with guidelines for how to approach requests for changes to names, CIP codes, etc. As of now, there are no written guidelines or processes and so who decides and what authority IRAPO has to make a determination is unclear. The procedures are intended to give everyone a sense of how such requests can be made. However, existing programs already have assigned names, numbers, and CIP codes. Nothing will change with these unless a request is made. IF a request is made, we want to have criteria and processes in place to manage the request. |