

January 8, 2009

Dr. Risa I. Palm
Provost and Vice Chancellor for Academic Affairs
State University of New York
State University Plaza
Albany, NY 12246

**RE: Proposal by the University at Albany for a
Combined MA Women's Studies / PhD Sociology Program.**

Dear Risa,

I am writing to share some major concerns regarding the above referenced combined degree program (Attachment #1) that has recently been approved by the University at Albany and submitted to SUNY System. As with all proposals that present novel issues, it would appear that it would be most beneficial for SUNY and UAlbany if your office work together with the University Faculty Senate to carefully review this proposal and to formulate appropriate guidelines before this proposal – perhaps in a modified form - is sent on to the State Education Department. In summary, the main concerns are as follows.

1. There is no precedent for a registered combined program within SUNY that involves a Master and a PhD degree from DIFFERENT departments, and there appear to be no SUNY guidelines that regulate such programs. In fact, such formally registered programs involving MA and PhD from different departments may not exist at any other university in the USA. Consequently, the UAlbany program, if approved, will set a very broad precedent.
2. The proposal formalizes a 100% double counting, i.e., a “two for the price of one” policy. All other formal dual degree programs at UAlbany (e.g. BA/MA, BS/MA, MA/MA, joint programs UAlbany – Albany Law School) impose specific limits on the number of credits that can be counted towards both degrees simultaneously, typically 40% of one program, or a maximum of 20% of the combined total credits. The unprecedented complete double counting explicitly documented in the proposal raises major questions about the quality and integrity of the program that may reflect negatively on UAlbany and – if approved by System - also on SUNY.

3. While the WSS/SOC proposal was approved by UAlbany faculty governance in May 2008, such approval was based on information that was significantly incomplete. Once additional relevant information became available soon thereafter, UAlbany Senate Officers recognized the potential problems and urged the UAlbany President to delay signing the bill until more complete information would be available. Such information was gathered by the Committee on Educational Policy and Procedures (CEPP) of the UAlbany Graduate Academic Council (GAC) during fall 2008, but there was no thorough review by governance of CEPP's reports. The proposers of the WSS MA / SOC PhD proposal de facto ignored relevant information implicit in the reports, were adamant about not considering any revisions, and eventually prevailed upon Interim Provost S. Phillips and Interim President George Philip to approve the proposal in its original form at the beginning of December 2008.

4. The proposers and other supporters of the proposal argue that their proposal does not create anything new, since this particular combined degree program, as well as others, have been offered informally at UAlbany. Justification for such informal "programs" is derived from a right of the doctoral faculty to evaluate and decide what prior graduate work of an applicant qualifies the student for "advanced standing", i.e., to decide what prior course work could be counted towards fulfillment of the course requirements for the PhD. It appears that the proposers want to transform the *informal arrangements* to grant advanced standing to students based on a case by case evaluation of the individual's record into a standardized practice formalized as a combined degree program to be registered with the State Education Department, without taking into consideration the substantial differences and the implications of an unprecedented formal 100% double counting for the integrity and quality of SUNY's programs.

5. Additional context for the approval process at UAlbany is provided by the fact that the UAlbany Dean of Graduate Studies, who successfully promoted the proposal before the UAlbany Senate last May and before the Graduate Academic Council later this fall, is a former Director of Graduate Studies and former Chair of the Department of Women's Studies. The Dean also continues to be a "core" faculty member of that department. Furthermore, the Chair of the CEPP, the committee of the Graduate Academic Council that in fall 2008 "researched" the existence of comparable programs and the need for any relevant regulations, is a staff member in the Office of the Dean of Graduate Studies. While this appearance of a major conflict of interest has no direct bearing on the merits of the proposal and will have to be addressed by UAlbany Faculty Governance, it does shed some additional light on the particular decision making process concerning this proposal.

More details about these matters and relevant documentation are provided in the appendix.

Again, given the unusual nature, precedent setting potential, and the concerns about 100% double counting (as described in items 1 – 4 above) in a proposal to be registered with the State Education Department, it would appear that a thorough review by SUNY System and the University Faculty Senate would be in the best interest of SUNY and help to protect the integrity of its programs. While a combined WSS MA / SOC PhD program may indeed be a valuable interdisciplinary addition to SUNY's programs, the underlying questions and

concerns about the integrity of this program regarding the extent of admissible double counting should be carefully examined before the proposal is submitted to the State Education Department.

I hope very much that your office will initiate such a thorough review by SUNY System and the University Faculty Senate. SUNY needs to ensure that its programs meet the highest standards of integrity recognized by leading institutions.

Please let me know if I can be of further assistance.

Sincerely yours,

R. Michael Range
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Cc:

John J. O'Connor, Officer in Charge and Vice Chancellor, SUNY
Carl Wiezalis, President, University Faculty Senate
Norman Goodman, Vice President and Secretary, University Faculty Senate
Mark Noll, Chair, Graduate and Research Committee of the University Faculty Senate

APPENDIX

The numbering of sections in the appendix corresponds to the numbering of areas of concern in the letter.

1. a) The UAlbany Graduate Bulletin (<http://www.albany.edu/graduatebulletin/>) does not contain any guidelines or regulations for combined degree programs involving an MA degree and a PhD degree. There are specific guidelines governing BA/MA, BS/MA, MA/MA combined degree programs. The only formal registered program listed in the Graduate Bulletin involving an MA and a PhD degree is the *Joint M.S.W./Ph.D. Program in Social Welfare* offered by the School of Social Welfare, a unit without any departmental structure.

b) UFS colleagues at the other SUNY University Centers reported that there are no combined MA/PhD program involving different departments at their institutions, and that they are not aware of any relevant SUNY regulations. (e-mail correspondence available upon request.)

c) The CEPP report states: *“At this time, the CEPP was unable to find any cross disciplinary MA/PhD programs that are officially registered with a University or state that could be used as a model for the proposed Womens’s Studies MA / Sociology PhD.”* (CEPP report of October 16, 2008 meeting, Attachment # 2)

2. a) The UAlbany guidelines regulating combined BA/MA, BS/MA, MA/MA programs explicitly limit the number of credits that can be counted towards both degrees simultaneously. For example, for MA/MA: “Total minimum credit-hour requirements for dual master's degrees programs will be 48 credits. Up to 20 percent of the total graduate credits normally required for dual programs may be applied simultaneously to both graduate programs.” (http://www.albany.edu/graduatebulletin/requirements_dual_masters.htm)

b) While the CEPP report (Attachment #2) mentions the Public Administration & Policy / Albany Law School Joint M.P.A / JD program in its search for applicable comparable program, that report fails to point out that this registered program also limits the credits that can be double counted: “An advantage of the joint degree program is that a maximum of six courses may be applicable to both degrees.” (http://www.albany.edu/graduatebulletin/public_admin_policy_joint_mpa_jd_degree.htm).

c) The Social Welfare Joint M.S.W/Ph.D. Program mentioned in 1.a) limits double counting to 12 out of a total of 96 credits. (http://www.albany.edu/graduatebulletin/ssw_joint_msw_phd_social_welfare.htm)

d) The CEPP report also makes reference to dual degree programs at the University of Michigan:

“During the discussion of this issue, the University of Michigan has been referenced several times as having dual programs. It was discovered that the University has a

“Student-Initiated Dual Degree Program” that allows a student to pursue a doctoral degree in one field and a Master’s in another. The student can, in essence, combine any two areas they choose. Please see 2.3.1 at

<http://www.rackham.umich.edu/policies/gsh/section2/#23>.” (Attachment #2)

Quite surprisingly, the CEPP report neglects to also point to section 2.3.2 on “Double Counting Credit Hours for Dual Degree Programs”, even though section 2.3.1 ends with such a reference, and section 2.3.2 comes immediately thereafter. There one would have read a remarkably clear policy which in particular includes the following statement:

- *“To preserve the integrity of each Rackham degree, at least half of the minimum required credit hours for each Rackham degree must be earned in the Rackham program under a Rackham registration, and counted solely for that degree. For example, a student enrolled in a 36-hour Rackham master’s degree program may not apply more than a combination of 18 transfer and/or double-counted credit hours toward the Rackham program. “*

Given that these Student-Initiated Dual Degree Programs at the University of Michigan are the only formal dual MA/PhD programs that the CEPP could identify nationwide, it is more than puzzling that the CEPP neglected to point out the critical limit on the number of credits that can be double counted. If it is important for UMichigan to *“preserve the integrity of each Rackham degree.....”*, shouldn’t it be equally important for SUNY to preserve the integrity of each graduate degree offered by any of its units, and by UAlbany in particular?

To summarize: All examples of formal combined programs that involve an MA and a PhD or JD degree that have been identified do explicitly and significantly limit the number of credits that can be counted simultaneously towards both degrees. It is difficult to understand how the CEPP, which after all identified these programs, could have failed to point out this critical information that goes to the very heart of the concerns about the quality and integrity of the Women’s Studies / Sociology proposal. (See also 5.e) below)

3. a) The 10/03/2008 letter by Senate Vice Chair Range to UAlbany Interim President George Philip summarizes the approval process at UAlbany and relevant issues up to that point in time (Attachment #3).

b) Subsequently, the CEPP of the Graduate Academic Council (GAC) submitted its first report (Attachment #2) which documents the non-existence of comparable registered combined MA/PhD programs. Details of this report have been discussed under 1. and 2. above. Note, in particular, the puzzling omissions of critical interpretative information in that report. The CEPP also met on October 30 to discuss whether there is a need for new policies regarding combined MA/PhD programs. (Attachment #4) The Committee concluded that no new policies were needed. A detailed written response was submitted to Larry Kranich, Chair of the Graduate Academic Council, on Nov. 2 (Attachment #5).

c) The preceding information and the concerns regarding the excessive double counting in the proposed UAlbany combined MA/PhD program were thoroughly discussed with Interim Provost Susan Phillips in a meeting on November 7, 2008.

d) The questions raised in response to the second CEPP report (Attachment # 5) were discussed at the November 11, 2008 meeting of the GAC, which was attended by several senate officers. No agreement was reached. The Chair of the CEPP, the Dean of Graduate Studies, and the chair of the Women's Studies Department did not see any need to limit double counting of credits, since the particular "program" had been run informally, and it was the right of the Sociology doctoral faculty to accept prior course work towards the PhD. The proposers were asked specifically why they wouldn't consider setting up a *Women's Studies Track of the Sociology PhD*, in analogy to the Latin American and Caribbean Studies Track of the Spanish PhD. No answer was given, except for the statement that the Sociology department does not have any tracks for the PhD. No further explanation was given. (Attachment # 6). This effectively terminated any efforts to work with the proposers to modify their proposal to address the concerns about double counting.

e) Based on the two reports of the CEPP and recommendations by stake holders, Interim President Philip approved the proposal in early December 2008.

4. a) The second CEPP report (Attachment #4), while intended to address the question whether any new regulations may be needed for combined MA/PhD programs, de facto sets out a rationale in support of the *informally* administered WSS MA / SOC PhD, and of other such *informal* dual degree programs: "*Currently, students who complete any Master's degree at the University can apply to a PhD program and it is left up to the PhD department to decide how many (if any) of the credits are applicable to the PhD program.*" (Attachment # 4) It should be noted that this "policy" stated by CEPP is not listed in the UAlbany Graduate Bulletin. What does exist are more restrictive explicit policies regulating a second MA program at UAlbany. It appears that the CEPP creates a "policy" of its own liking, simply based on the fact that there is no explicit applicable policy in the Graduate Bulletin, as follows. "*There are no regulations in the Graduate Bulletin that limit the amount of credits a UAlbany Master's degree can be used towards a UAlbany PhD..... . Even students who complete an MS/MA at another institution can still apply apply a large amount of credits (if not all) from their MA/MS to a UAlbany PhD.*" (Emphasis added.) The CEPP thus notes that there is a limit to the number of credits that students from *other* institution may apply towards "advanced standing", and - because there is no explicit mention of *UAlbany* students - simply concludes that there shouldn't be any limits at all for *UAlbany* students, as long as the credits are approved by the PhD department. Furthermore, according to the CEPP, existing policies regarding "advanced standing" do not apply to students already at *UAlbany*. "*Applicants for admission to the doctoral programs who have completed graduate courses or programs elsewhere may apply for admission with advanced standing.* http://www.albany.edu/graduatebulletin/women_studies_ma_degree.htm *Student enrolled in the MA Women s Studies/PhD Sociology would not be regulated by this 50% policy as they completed the MA in residency at the University.*" (Attachment #4)

b) Even if the arguments above provide some justification for the *informal* combined MA/PhD program that has been operated by the Women's Studies and Sociology Departments, it is difficult to apply this rationale to the majority of the students that,

according to the proposal, have gone through the program. The proposal includes the following data.

“Since the inception of the Women’s Studies M.A. program, 11 Sociology PhD students have completed the Women’s Studies M.A. while pursuing their PhD, and 2 Women’s Studies M.A. students have been accepted into the Sociology PhD program. One additional student started both programs in Fall 2005 and is pursuing them concurrently.” (Attachment #1).

It would appear that an admission to the PhD program based on “advanced standing”, as argued in a) would only apply to the 2 (out of the 14 students) students that had completed the Women’s Studies MA prior to applying for admission to the Sociology PhD program. The other 11 (Sociology PhD) students got the Women’s Studies MA (for free) “while pursuing their PhD”, by simply choosing their course work appropriately. The proposers’ data de facto documents the existing “two for the price of one” policy in the *informal* program operated by the Women’s Studies and Sociology Departments. The proposal under consideration simply seeks to formalize this policy into an official combined degree program to be registered with the State Education Department.

c) To confuse matters even more, the UAlbany Data Bank records several *doctoral* students in the Women’s Studies Department, as well as several *doctoral degrees* awarded by that department over a number of years. (See Attachment #7) Since the UAlbany Women’s Studies Department does NOT have a *doctoral* program, that information is, at best, misleading. This particular matter had been presented to Interim Provost Phillips on November 7, 2008. Dr. Phillips recognized the inappropriateness of the data as reported by Institutional Research, and she stated that she would follow up with cognizant individuals to correct this matter. As of December 29, 2008, no changes or explanatory additions have been made to the data reported in the UAlbany Data Bank.

5. a) The Dean of Graduate Studies Marjorie Pryse is an ex-officio member of the UAlbany University Senate and of its Graduate Academic Council. In that capacity she spoke in favor of the WSS MA / SOC PhD proposal at the May 12, 2008 senate meeting:

Senate Bill 0708-23: Proposal to establish a Combined M.A. Women’s Studies / Ph.D. Sociology Program: *The bill was introduced by GAC Chair Kranich. Dean Pryse and Jon Bartow spoke in favor. A discussion ensued concerning the fact that in contrast to existing MA/MA and BA/MA joint programs, this proposal allowed for the full 32 credits for the MA to be double counted towards the PhD. The Bill passed, with six opposing and two abstaining.* ([http://www.albany.edu/senate/05-12-08_Senate_Minutes\(1\).doc](http://www.albany.edu/senate/05-12-08_Senate_Minutes(1).doc))

Jon Bartow, the other individual identified as speaking in favor of the proposal, is Assistant Dean of Graduate Studies and NOT a member of the senate. Dean Pryse is a former Director of Graduate Studies and former Chair of the Department of Women’s Studies, and she continues to be a “core” member of that department. The official “weight” of these two top administrators from the Graduate Studies Office may have put a “stamp of approval” on the proposal that swayed most senators to vote in its favor.

b) In September 2008 Dean Pryse continued to inject herself into matters concerning the WSS/SOC proposal. Excerpts from a September 18, 2008 e-mail from Dean Pryse to Larry Kranich, Chair of the Graduate Academic Council, read as follows.

"Larry.....

.....Concerning the question of the combined MA Women s Studies/PHD sociology, it is not at all appropriate for the GAC to be discussing this issue. I do not understand by what policy in the Charter the Senate Executive Committee or any of its councils has the prerogative to re-discuss a matter that has been approved at all levels: departments, CAS Faculty Council, GAC, and the Senate itself. The Senate passed the bill, and then it was supposed to go to the President for signature (as do all bills, once Senate has passed them). By what authority did anyone attempt to hold back this bill? Unless and until we have had a chance to fully explore what happened after the bill left the Senate floor and arrived at the President s desk, I strongly oppose any re-discussion by GAC of this bill and respectively request that you do not hold such a conversation in my absence on Tuesday.

*Please bear in mind that what is at stake here is not the content of any particular bill, but rather the behavior of Reed (added: then Senate Chair Reed Hoyt) (and perhaps others) on the Senate Executive Committee who appear (according to the e-mail I was copied on over the summer that was signed by Reed) to have held back the bill for no particular reason and contrary to any legitimate Senate process. Senate procedure, it strikes me, is NOT the prerogative of the GAC, and therefore I strongly object to this item appearing on the agenda for Tuesday. Best—
Marjorie*

*Dr. Marjorie Pryse
Dean of Graduate Studies "*

Note: According to UAlbany's parliamentarian, a senate bill is not official until signed by the President. As long as a bill is not official, the senate, and/or the appropriate committee(s), can discuss and amend the bill, or even substitute another bill for it.

c) Dean Pryse (and others) voiced strong objections in mid september 2008 about the senate officers' intervention with Interim President Philip. UAlbany Senate Chair John Delano wrote in a September 19, 2008 e-mail to the other Senate Officers Collier, Hoyt, and Range:

*".....the perceptions are way out of alignment on the part of the
> proposers of Bill 0708-23 (The WSS MA / SOC PhD). (a) I had a 2-hour telephone conversation (!)
> with Marjorie (Added: Marjorie Pryse, Dean of Graduate Studies) this afternoon.
(b) Three individuals associated with
> WSS/SOC have requested a meeting with George (Added: George Philip, Interim President) on how they have been wronged
> by all of us in this process. (c) There is a perception that the subset of
> the Senate Executive Committee was out-of-bounds by approaching George
> with questions after the Bill had passed the Senate on May 12.*

*(d) I had been planning to mention the WSS/SOC issue in my
> Chair's Report on Monday, even before this explosion, and
still plan to
> make reference to it.*

d) At the November 11, 2008 meeting of the UAlbany Graduate Academic Council, at which the status of the WSS / SOC proposal was further discussed, Graduate Dean Pryse (an ex-officio member of that Council) continued to use her position to promote the proposal. (Senate Officers Collier, Hoyt and Range attended the meeting; minutes are not yet available.)

e) The Chair of the CEPP (the committee that “researched” the comparable programs and the need for any regulations) is a staff member in the Office of the Dean of Graduate Studies. This particular apparent conflict of interest may provide some background to explain the puzzling lack of diligence in the work of the CEPP that led to the omissions noted in 2. and 3.b).

In summary: The appearance of a major conflict of interest by Dean of Graduate Studies M. Pryse - a member of the Women’s Studies Department - and others in her office in the handling of the WSS MA / SOC PhD proposal is well documented. Dean Pryse did not recuse herself, even though the matter was raised with Interim President Philip (in the 10/13/08 letter, with cc to Dean Pryse) and with Interim Provost Phillips (in the 11/7/08 meeting). While this matter has no bearing on the merits of the proposal, it does provide important background information to understand the approval process regarding this particular proposal. UAlbany faculty governance is studying options how to prevent such conflicts of interest to interfere with decision making processes in the future.