October 5, 2018

Faculty Senators,

Many of you may be unaware of efforts by The Higher Education Coordinating Board (THECB) to enforce field of study requirements upon our institutions of higher education in Texas. I have heard from several of our faculty who are serving on these field of study committees for their majors. In many cases, these meetings have not gone well. Faculty feel that THECB is limiting our ability to deliver high quality degree programs for our students through the field of study requirements.

Recently I heard from our colleagues at University of Texas-Austin. They are deeply concerned about the new efforts of THECB to enforce our acceptance of the field of study requirements. In response, they drafted a resolution. We have worked with them to create the joint resolution you will find below. In addition, our accrediting body, the Southern Association of Colleges and Schools Committee on Colleges (SACSCOC) sent a letter of concern to THECB. You will also find that letter below. Lastly, you will find newly drafted Texas A&M University Field of Study Curriculum Policy at the end of the document.

The Executive Committee of the Faculty Senate unanimously approved the resolution. I hope you will join us in approving this resolution at our October meeting. If you have any questions, please let me know.

Sincerely,

Julie Harlin
Speaker
Resolution on Fields of Study

The fields of study requirements promulgated by the Texas Higher Education Coordinating Board (THECB) threatens the authority and responsibility of higher education faculty to design curriculum. This requirement also threatens the ability of institutions to properly and adequately prepare students in their degree programs as a result of unintended consequences related to preparedness, certification, and accreditation.

The American Association of University Professors (AAUP), the American Council on Education (ACE), and the Association of Governing Boards of Universities and Colleges are, respectively, the leading associations of higher education faculty, higher education upper administrators, and higher education governing boards. Their joint statement on governance lays out the basic and necessary division of responsibilities and authority among and between their respective constituencies: faculty, administrations, and governing boards. The faculty

sets the requirements for the degrees offered in course, determines when the requirements have been met, and authorizes the president and board to grant the degrees thus achieved. *(AAUP Statement on Government of Colleges and Universities, Section 5)*

This authority flows from the fact that the faculty teach their institution’s courses. Courses should represent the state of knowledge in their respective disciplines, and they vary according to the type of institution, place of the specific course in the curriculum, student preparation, the program, and the faculty.

The Coordinating Board action on field of study requirements is inconsistent with the accreditation required of public higher education institutions in Texas by the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC). There are good reasons for SACSCOC to question THECB on fields of study. THECB is not a faculty body. Nor is it an educational institution. It is not authorized by an accrediting agency to offer a curriculum and it lacks the competence to be so authorized. Having institutions of higher education to send faculty to sit on committees to approve the fields of study does not provide them this competence. State control of curriculum is fundamentally inconsistent with American ideals of intellectual freedom and higher education law.

Accredited degrees are subject to review. Accreditation is evidence that scholars from comparable institutions recognize degrees as meeting national standards. The accreditation process, organized through regional accrediting commissions, is recognized by federal law as a requirement for all federal funding and by Texas law as a requirement for certain state funding.

We support coordination of requirements between Texas four-year institutions and community colleges; we support coordination of requirements among four-year schools as well. But such coordination must be done by local agreements between institutions offering four-year programs and the community colleges. It cannot be done in a way that erodes the ability and authority of faculty in four-year institutions to design the curriculum that best benefits their students. Educational excellence is best advanced by providing many pathways from many starting points, without reducing standards for the sake of uniformity.
August 24, 2018

Dr. Raymond A. Paredes
Commissioner of Higher Education
Texas Higher Education Coordinating Board
P. O. Box 12788
Austin, TX 78711-2788

Dear Dr. Paredes:

We have recently received emails from representatives of SACSCOC member institutions in Texas expressing concerns related to the "Field of Study" curricular process currently at work under the auspices of the Texas Higher Education Coordinating Board (THECB). As you know, our Principles of Accreditation expect member institutions to demonstrate institutional control over the quality and integrity of their educational programs. Of particular interest in this specific situation are the standards which speak to academic governance, evaluating and awarding academic credit, and policies for awarding credit.

Standard 10.4 (Academic governance) expects an institution to provide evidence that it "(a) publishes and implements policies on the authority of faculty in academic and governance matters, (b) demonstrates that educational programs for which academic credit is awarded are approved consistent with institutional policy, and (c) places primary responsibility for the content, quality, and effectiveness of the curriculum with its faculty." Many state systems in our region employ system-wide curriculum committees to ensure consistency across the curriculum and ease of transfer for students. In such situations, member institutions must provide evidence that such committees are broadly representative and responsive to the concerns of all the institutions being affected. This allows the institution to argue that it "places primary responsibility for the content, quality, and effectiveness of the curriculum" with the institutional faculty.

The information provided to the Commission suggests that the members of the THECB advisory committees working with the "Field of Study" process may comprise only a small sampling of the total number of institutions affected by their recommendation. SACSCOC member institutions also expressed concern that these advisory committees were not taking concerns expressed by institutions into account in their deliberations before formalizing their recommendation.

Standard 10.8 (Evaluating and awarding academic credit) requires a member institution to provide evidence that it "publishes policies for evaluating, awarding, and accepting credit not originating from the institution. The institution ensures (a) the academic quality of any credit or coursework recorded on its transcript, (b) an approval process with oversight by persons academically qualified to make the necessary judgments, and (c) the credit awarded is comparable to a designated credit experience and is consistent with the institution's mission." A salient concern – particularly in the mandating of transfer of lower division coursework – is
the comparability of the “credit experience” when designating the course being transcripted by the receiving institution. Again, the primary concern expressed by SACSCOC member institutions is that the advisory committees are neither broadly representative nor responsive to the formally expressed concerns of institutions and their educational program faculty.

Standard 10.7 (Policies for awarding credit) expects institutions to provide evidence that they publish and implement “policies for determining the amount and level of credit awarded” for the courses they teach. A significant concern raised by our member institutions is whether courses designed to meet the requirements of the educational program at the baccalaureate level should be taught as lower division or upper division courses. If commonly accepted practice in the academic field of study is to provide such instruction at the upper division level, then an articulation agreement which mandates the course be offered as a lower division course would raise questions about the rigor of the course and the program. It would also raise questions about whether the community college is providing instruction at a baccalaureate level when it is only accredited to provide programs at the associate's level.

SACSCOC staff and I are aware that a laudable concern for students and their ability to transfer from the community college to a four-year institution and finish a baccalaureate degree in a timely manner lies at the foundation of the “Field of Study” process. But the questions and concerns raised by our member institutions appear to warrant some attention. I would appreciate more clarification about the process and the way the THECB advisory committees have been proceeding, since their recommendations will have a significant impact on our member institutions’ ability to demonstrate compliance with the standards cited in this letter for the foreseeable future. Please respond to these concerns by October 15, 2018, and send the information to my attention. I am also available to meet with you to discuss our concerns, should you wish.

Sincerely,

Belle S. Wheelan
Ph.D.
President

BSW/SMS:rb

cc. Dr. Brenda L. Hellyer, Chair, SACSCOC Board of Trustees
    Dr. Johnette McKown, SACSCOC Executive Council Member
    Mr. Ray Martinez III, SACSCOC Executive Council Member
Texas A&M University
Field of Study Curriculum Policy
4 October 2018

Texas A&M University is committed to fostering the successful preparation of all undergraduate students, whether they enter the university as first-time-in-college or as transfer admits. We recognize and value the need to foster student progress to fulfillment of degree requirements and timely graduation and the role transfer credit can play in both. Accordingly, we are committed to establishing and sustaining the integrity of our undergraduate curricula and academic experiences they provide. To support the integrity of our undergraduate curricula we must maintain alignment between our academic programs and the university’s mission of “providing the highest quality undergraduate and graduate programs” and to prepare “students to assume roles in leadership, responsibility and service to society.” We entrust to the faculty content experts the responsibility to develop and maintain curricular requirements and establish academic policies and processes that demonstrate programs of study, when satisfactorily completed, fully meet and exceed the standards of regional and programmatic accreditors.

This policy was informed by the following:

- TAC, Title 19, Part 1, Chapter 4, Subchapter B, Rule §4.28 Core Curriculum
- TAC, Title 19, Part 1, Chapter 4, Subchapter B, Rule §4.32 Field of Study Curricula
- SACS-COC 2018 Principles of Accreditation Standards 10.4 Academic Governance, 10. Policies for Awarding Credit, and 10.8 Evaluating and Awarding Academic Credit
- Texas A&M University Undergraduate Catalog

Admission Status
This Field of Study Curriculum transfer policy applies only to degree-seeking students whose first admission to Texas A&M University is as a transfer student matriculating from another public institution of higher education in Texas directly into a baccalaureate degree program at Texas A&M University for which an applicable Field of Study Curriculum has been approved by the Texas Higher Education Coordinating Board.

Courses Specifically Identified in a Field of Study Curriculum
For qualifying students, any courses specifically identified in the Field of Study Curriculum (12-39 hours) successfully completed at a public institution of higher education in Texas prior to transfer to Texas A&M University will be transferred and applied to the student’s degree program. The student may be required to satisfy the remaining course requirements in the field of study curriculum, or to complete additional requirements in the degree program, as long as those requirements do not duplicate course content already completed through the Field of Study Curriculum.

Core Curriculum Courses Beyond Those Specifically Identified in a Field of Study Curriculum
For qualifying students, any core curriculum courses successfully completed at a public institution of higher education in Texas prior to transfer to Texas A&M University will be transferred and the student will receive academic credit within the core curriculum at Texas A&M University. The student may be required to take additional courses to meet degree requirements.
Additional Degree Requirements
Degree requirements not fulfilled by transfer of courses specifically identified in a Field of Study Curriculum or transfer of additional core curriculum courses must be completed to meet the curricular requirements for the degree program as published in student’s catalog, satisfy all requirements for a baccalaureate degree, and support the student’s professional aspirations.