

	<b>Comment received</b>	<b>Changes to be made to document</b>	<b>Staff comment</b>
1	Submitted by Anne M. Bauer (not verified) on Fri, 02/06/2015 - 7:41pm The document says that institutions have to meet CAEP standards. Could you please clarify if this means being accredited by CAEP?	Changes made on p.14 of 02.04.15 draft	Thank you...yes it does mean that.
2	Submitted by Anne Bauer (not verified) on Fri, 02/06/2015 - 7:44pm The document indicates that institutions preparing educators must follow CAEP standards. Could you please clarify if this means all institutions must be accredited by CAEP?	See above	
3	Submitted by Janis Thompson (not verified) on Mon, 02/09/2015 - 8:45am On page 12, h1 (faculty credentials): I would like to see the wording of the first bullet point in that section to say, "must hold a MINIMUM OF a master's degree in the discipline..." There are a number of us who have PhD's or professional degrees (MD, DO, DVM, etc.) who do NOT have a masters degree but have instead gone directly on to the terminal degree. The current wording in that section seems to exclude our credentials as being acceptable for teaching general education and transfer courses.	Change made on p. 7 of 02.04.15 draft	Thank you. That was not the intent and the change has been made.
4	Submitted by Bradley Duncan (not verified) on Mon, 02/09/2015 - 10:35am I strongly suggest that the sentence beginning "Deviations from these..." should end with "...state approval." The additional language "...during the state approval process" is redundant and might lead some to believe that the only time deviations from the "standard formula" will be considered is during the initial approval process. That is not the case. I would also suggest removing the word "considered" from the next sentence so that it reads "The Doctor of Philosophy (Ph.D.) degree is a research degree..."	Change made on p. 57 of 02.04.15 draft	Thank you

5	<p>Submitted by Jeff Bates (not verified) on Tue, 02/10/2015 - 12:59pm</p> <p>On page 56 of the draft it specifies that "Non-technical studies should make up 50% of the curriculum" for Associate of Applied Business and Associate of Applied Science degrees. This should read that "Non-technical studies should total at least 30 credit hours." Mathematically it does not make sense to have one-half of a degree be non-technical, and there are other references in OBOR documents that specify 30 credit hours of non-technical courses for AAS degrees.</p>	<p>Change made on p. 56 of 02.04.15 draft</p>	<p>Thank you. The suggested change has been made</p>
6	<p><a href="#">Permalink</a> Submitted by Brett Joseph (not verified) on Tue, 02/17/2015 - 9:08am</p> <p>I am writing to request access to the form to initiate program review for the new AAS Degree in Sustainable Agriculture at Lorain County Community College. Please respond to <a href="mailto:bjoseph@lorainccc.edu">bjoseph@lorainccc.edu</a></p>	<p>Not applicable</p>	<p>Matt E will reach out to provide the information requested</p>
7	<p>Submitted by Andi Wesley (not verified) on Tue, 02/17/2015 - 2:08pm</p> <p>As a graduate from Columbus State Community College's Interpreter Education Program, I know how important the 70 hours of curriculum credit were. Sign language interpreters require a great deal of training, and the hours I received at CSCC during my program were, I believe, sufficient to molding me into the best interpreter I could be. Taking away 5 credit hours from the program in order to fill the maximum 65 hour curriculum plan for Associate's degrees would take away from this important training for future interpreters. It is essential to the Deaf community that they have competent interpreters who were sculpted from a full, complete curriculum. Please reconsider this and aim to keep Associate's Degree programs above 65 hours, as CSCC's Interpreter Education Program has been so successfully.</p>	<p>No changes made to document</p>	<p>Changes are not needed. The guidelines allow for associate degree programs in technical areas to exceed the 65 hour limit as long as they are aligned in length to other programs across the state. The institution's chief academic officer makes the determination on whether or not this is necessary.</p>

8	<p>Submitted by Marsha Moore (not verified) on Tue, 02/17/2015 - 2:56pm</p> <p>Training for interpreters is so important and the program at Columbus State Community College is so amazing! I cannot imagine how impactful it could be removing an extra 5 hours from the curriculum. Keep the 70 hours requirement as it is now because it is STILL NOT enough. It is so important that the interpreters get as many hours of interpreting experience before they are sent out to the world to interpret. It is extremely important to have educated interpreters who can do their job, both interpreting and translating what the deaf/hard of hearing person is saying as well as what the hearing person is saying too. Qualified interpreters are essential at CSCC, hospitals, legal, parents of hearing kids enrolled in public schools, etc. to have the most education and experience possible before graduating. Please keep the 70 hour requirement and continue to produce the highly qualified interpreters out of CSCC that the community can hire without any legal issues for lack of education or experience or both. Thank you.</p>	No changes made to document	See response to comment #7
9	<p>Submitted by Vanessa Radden (not verified) on Tue, 02/17/2015 - 3:06pm</p> <p>Hello, I would like the interpreters at CSCC, hospitals, legal, etc. to have the most education possible before graduating. It would be impactful by removing an extra 5 hours from the curriculum. It also important to have programs that allow 70 hours to insure that they train qualified interpreters. The more they are train the more they are qualified to help the deaf and hard of hearing who need them at hospitals, jobs and whatever else the case may be. We thank you for your time in this matter.</p>	No changes made to document	See response to comment #7
10	<p>Submitted by Emily Edwards (not verified) on Tue, 02/17/2015 - 4:28pm</p>	No changes made to document	See response to comment #7

	<p>Cutting those seemingly insignificant hours from a program as rigorous as the Interpreter Education Program for Sign Language, would be detrimental to the quality of graduates. Every course is meticulously placed and organized in a manner so that students are exposed to the full spectrum of conflicts in a safe setting. If you were to eliminate these hours; certain courses would have to be sacrificed. Topics like Mental Health, Medical and legal interpreting would have to be cramped together. Students would only be exposed to surfacy concepts, versus really understanding these potentionally life threatening demands. The program is extensive enough as it is, I cannot imagine cutting back anymore. There is not a single course that ITP students take, that is not relevant or applicable. I am a working interpreter in the field, and I can safely say that were it not for every single course I was required to take, I wouldn't be able to make nearly as ethical and safe decisions as I do today.</p>		
11	<p>Submitted by Dr. John Myers,... (not verified) on Wed, 02/18/2015 - 10:48am</p> <p>I am not in support of several components of the new guidelines, specifically the credit limits, and the mix of general education (non-technical) and technical education. The reduction of credit limits to 60 or 65 for these Associate degrees, while giving the appearance of making education (and completion) quicker and more cost effective for students, undermines quality and safety in many of the affected education programs. Many of the affected allied health program graduates are literally responsible for the lives of patients based on these two-year degrees and this change reduces the quantity and quality of content, safety, practices, clinical education and more that can be delivered. Our community colleges are already challenged by accrediting agencies to deliver greater and greater amounts of content to graduates, but now the state of Ohio wants them to do this with reduced available credits? How can that be accomplished in a safe and effective manner, and do we feel</p>	<p>No changes made regarding 65 semester hour program length.</p> <p>Change made on p. 56 of 02.04.15 draft to address technical/non technical concerns</p>	<p>See response to comment #7 (add comment re: technical Vs non-technical)</p> <p>Changes have been made to clarify that non-technical studies, which include both general education and applied general education courses, should make up 30 semester hours.</p>

	<p>comfortable releasing those graduates with reduced training to work on our own family members? The same issue arises from mandating the strict split between technical and non-technical education. Associate degrees in an applied science and vocational field were never meant to be designed for a liberal arts student or for transfer to a bachelor degree; they were designed for preparation for work in a specific occupational field. Mandating such a large amount of the available credits to be spent on the non-technical courses and not on the technical courses in the major (occupational) field further waters down the opportunity to actually prepare the student for real, substantial, meaningful entry into practice. Employers already complain that students are not as prepared as they might like. Now the state is mandating that they be less prepared by reducing the available credits that can be applied to degree programs and that can be applied to the major courses in the field. I do not think that this bodes well for graduates to work well or safely in my field.</p>		
12	<p>Submitted by Chanin Stanford... (not verified) on Thu, 02/19/2015 - 10:56am  As noted in Ohio Administrative Code Rule 3333-1-08, a non-profit institution that has been continuously authorized by the Chancellor and continuously accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools (HLC) for more than 20 years may choose to follow the approval process described in section 2.d., Option For Continually Authorized Institutions. d. Option for New Undergraduate or Graduate Degrees at Continuously Authorize Institutions Proposal Materials. The institutional mentor accepts materials prepared for HLC in lieu of the standard Board of Regents proposal. The institution coordinates with the mentor to ensure that the office receives the materials received by HLC and the HLC site visit team at least two months prior to the visit Our concern is that there remains an "Option for New Undergraduate or Graduate Degrees at</p>	No changes made to document	We are restricting this to regional accreditors only because those standards are most similar to those of the Chancellor.

	Continuously Authorized Institutions” (see pages 23 and 34) that is not open to all institutions and accrediting bodies. We would request that this rule be expanded to include all institutions that have been continuously accredited by a “regional or national accrediting agencies recognized by the Secretary of the U.S. Department of Education.”		
13	Submitted by Chanin Stanford... (not verified) on Thu, 02/19/2015 - 10:58am The regulations make specific semester hour recommendations for general education requirements. These guidelines fail to recognize quarter-based institutions. Institutions operating on a quarter system would be forced to offer non-standard credit hour courses (i.e. 4.5 quarter credit hours) or increase the underlying general education credit hours well beyond the Ohio requirements in order to meet the mandated number of credit hours, since quarter-hour courses are generally offered in 3-credit or 4-credit hour increments. Our concern is that this change will inadvertently force institutions offering quarter-hour programs to mandate additional credit requirements, causing an increase in time to completion, total program cost, and, quite possibly, student debt. We would recommend that the language be modified to specify only a total general education credit requirement (i.e. at least 30 hours), be modified to accommodate quarter hour credits (including the possibility of requiring particular courses rather than a number of minimum hours per course), or, alternatively, allow quarter-based institutions to rely on their underlying accreditation requirements in lieu of the Ohio guidelines.	No changes made to document	We do recognize that there might be occasional issues with the conversion. However, we feel it is important to ask for general education courses in each of the general education areas. Programs that include coverage of all five categories and meet overall semester requirements would be considered on a case by case basis.
14	Submitted by John Carreon (not verified) on Thu, 02/19/2015 - 4:29pm p. 51 #3 states "Such findings include, but are not necessarily limited to, being placed on probation, being asked to “show cause”, being asked to submit special reports or undergo special visits, or	Change made on p. 51 of 02.04.15 draft	The intent is for institutions to report outcomes that could potentially put the institution’s accreditation in jeopardy. Changes were made to the

	<p>being given shortened accreditation periods." The phrase "submit special reports" should be clarified to refer to only those reports required because of a negative impact on accreditation. OBR should not want outcomes or other basic reports that ACCSC or ACICS have their member schools submit. pp. 56,59,62 relate to the applied associate degree and gen ed requirements versus technical gen eds versus non-technical classes. p. 56 - "Non-technical studies should make up 50% of the curriculum. p. 59 - "Applied general education coursework cannot be counted toward meeting the minimum requirements for general education courses in associate or baccalaureate degrees." p. 62 - "Applied associate degrees (Associate of Applied Business, Associate of Applied Science, and Associate of Technical Studies), must include at least 30 semester hours of non-technical coursework, which includes both general education and applied general education (i.e., "basic") courses. The general education portion of the non-technical coursework must include at least 15 semester credit hours." These three references need to be made clearer so that they align better and provide direct guidance on what is allowed and what is not from the gen ed v. technical course perspective.</p>	<p>Change made on pages 56 and 59 of 02.04.15 draft to add consistency to the document.</p>	<p>section 3 heading and to the text to help clarify that intent.</p>
15	<p>IUC provosts: First of all, it is unclear what the intent of the document is. Are these guidelines that are suggested or rules that must be followed? If intended to be guidelines to fix as-of-yet unidentified problem(s), then the use of language such as "shall" and the detailed specifics throughout the document need to be modified. Otherwise, the document reads like a new set of rules.</p> <p>In addition, the document is very long, redundant and hard to follow. Again, if there was some indication of the problem(s) that the approach is trying to correct, the document might be better understood.</p>	<p>No changes made specific to this comment.</p>	<p>As noted in several meetings with the IUC provosts, the intent of this document is to make clear that the Board of Regents has consistent quality expectations for all institutions (community colleges and universities) (public, private not for profit and private for profit). The existence of previous rules and documents (2 year manual, RACGS manual, transfer policy) were not always aligned even though in practice</p>

			<p>program review has been aligned.</p> <p>The redundancy of the document is, in part, due to the fact that even though the standards are the same, the process for program approval differs. Institutions only need to refer to the process for their institutions (public UG, public grad, private, for profit, education) in each of the chapters.</p>
16	<p>IUC provosts: A major question is the relationship between this document and other processes, such as the Higher Learning Commission (HLC) new Pathways model for regional accreditation. First, this document seems to reflect former HLC processes, not the substantially new Pathways process. This new process makes submitting the same materials to OBR that have been submitted to the HLC extremely difficult, given the web-based entry of the assurance argument coupled with links to supporting evidence. More importantly, it is not clear why there is a need for OBR to be heavily involved in institutional accreditation, at the regional or “national” levels. We suggest OBR involve itself only after accreditors have flagged a major issue. Otherwise the workload for OBR will be significantly increased. There is also a need to clarify “national accreditation,” since, if it means accreditation for each discipline (e.g. ABET, AACSB, CCNE, etc.), the scope of OBR involvement in institutional accreditation would be enormous. It is not clear how OBR staff would manage all of the additional workload efficiently and effectively at a time when we are all called upon to control costs.</p>	<p>We have reworded the document (p.47 of 02.04.15 draft) to indicate that the Chancellor will only become involved in cases where there is a negative accreditation outcome. We ask to see final approval documents.</p>	<p>Thank you for this comment. Past conversations had suggested that there wasn’t concern about this.</p> <p>We have reworded the document to indicate that the Chancellor will only become involved in cases where there is a negative accreditation outcome. We will ask to see final approval documents.</p>

17	IUC provosts: Finally, what is the connection of this document to the program review required by RACGS?	No changes made to the document	The RACGS program approval process continues as is...as is stated throughout the document when discussing processes for approval of or changes to “graduate programs at public universities and the university of Dayton and case western reserve university” (i.e., RACGS)
18	IUC provosts: Page 5 item 1.c: regarding libraries – forcing compliance with ACRL standards, which is a private entity that serves its own constituency, is not advisable for public institutions.	No changes made to the document	It states “are consistent with” which is reasonably general. Librarians we spoke believe that our public and most non-profit colleges and universities would already be meeting these practices. It was put in place to provide guidance to the for-profit institutions in the state whose library facilities, staffing, and processes were woefully inadequate.
19	IUC provosts: Page 9: Item 1.h.4 – a faculty member teaching developmental courses needs only a bachelor’s degree. Consider raising minimum standard to the master’s level since they teach at a college or university.	No changes made to the document	Because the courses aren’t offered for college credit, a bachelor’s degree seemed an appropriate minimum. Some of the community colleges indicated they used bachelor’s prepared high school teachers for these courses.
20	IUC provosts: Page 7-8 has descriptions of faculty and graduate teaching assistant requirements to participate in instruction. <ul style="list-style-type: none"> <li>• A global problem with the bullet list of four requirements here is they are not listed as “OR” or “AND” so it is not clear if and when one supersedes another in the list of 4.</li> </ul>	No changes made to the document	These requirements were written by a committee made up of faculty and administrators from two and four year public institutions, including some

	<ul style="list-style-type: none"> <li>• More pointedly, since there are no general ed requirements in graduate education, only faculty with a terminal degree (or students working toward the terminal degree) would be eligible to instruct in graduate school. Therefore as written, the vast majority of MS/MA/MSW/etc students would not be eligible to work as TAs even in masters programs. Maybe most restrictively, in programs that do not have PhD programs (Anthropology, WSSG, etc), their students could not TA in their programs. There is the opportunity to have this listed as an “exception” (page 9), but this is not something that should be done with an entire program.</li> </ul>		<p>individuals heavily involved in articulation and transfer policy. It was vetted on numerous occasions with many stakeholder groups, including the IUC provosts, over the past two years.</p> <p>We believe it does provide the needed flexibility for TAs (p7 and p8 talk about “individuals making substantial progress who are mentored by ...”</p> <p>So students who are in master’s or PhD programs could TA for undergraduate gen ed and non gen ed courses, which only require a faculty member to hold a master’s degree</p> <p>You are correct in the assumption that a master’s student could not take responsibility for a class made up of other master’s students.</p>
21	<p>IUC provosts: Page 8 item 2: “Faculty members teaching technically- or practice-oriented courses must have practical experience in the field and hold current licenses and/or certifications, as applicable.”</p> <ul style="list-style-type: none"> <li>• What constitutes a "technical class?" Design? Basic mechanics?</li> <li>• What is the definition for “field experience?” Currently, engineering faculty can get licensed by their education and research. This will negatively impact the already-difficult</li> </ul>	No changes made to the document	<p>These items are often applicable for faculty members teaching in applied/technical programs in community colleges and for-profit technical degree programs (e.g., medical assisting, dental assisting, medical coding). We wanted to ensure that credentialing requirements were</p>

	<p>effort to get engineering students to come back for doctoral studies.</p> <ul style="list-style-type: none"> <li>• Why is OBR substituting their judgment for the Ohio Board of Registration for Professional Engineers and Professional Surveyors? If we meet the educational and experience requirements for having a license, that should be sufficient for OBR.</li> </ul>		<p>clear...particularly for the for-profit entities.</p> <p>For universities this comes into play for programs like nursing, teaching, OT, PT...and we don't believe there are problems for universities in meeting these requirements.</p>
22	<p>IUC provosts: Page 10 has a list of six Faculty Capacity requirements. At least three of these are problematic.</p> <ol style="list-style-type: none"> <li>1. Requiring that program "faculty members reflect the racial, ethnic and gender diversity of the community and the student body" is a great aspiration. But what community (in the discipline? In the neighborhood around the university?), what student body (the one in a specific program or the whole university? Grad students versus undergrads?), and what if the community and student body have different profiles (which takes precedence)? This is a long-term goal few have achieved, and a moving target. Perhaps it would be better to have the requirement that institutions simply have an approved plan to diversify faculty and staff to a level that is more clearly defined.</li> <li>2. Requiring a minimum of one full-time faculty member FTE per "equivalent of every 30 full-time students (30 FTE) in a degree program". Mandating FTE ratios and requiring direct access to full-time faculty limits institutional discretion and decision-making authority, especially with the move toward controlling the cost of higher education. Does this apply to online courses? Are institutions expected to tally both part-time students and part-time (adjunct?) faculty into the FTEs? This number will be hard to attain in some programs, but is this tally for individual programs or the university as a whole (relevant since this document is about program review, not</li> </ol>	<p>We have made some changes to faculty capacity section of the document (p.10 of 02.04.15 draft) to help clarify our intent--- a quality experience for the students without stifling campuses' ability to innovate for efficiency and cost-savings.</p>	<p>Thank you for bringing this up.</p>

	campus staffing)? 3. Each program is led by a full-time faculty member. What is the goal? If this is about faculty qualifications, being full time is a weak qualification. If this is about student accessibility to faculty, this is the wrong metric.		
23	Pages 10-11: items 1.j,1.k,1.l: seem to be based on the old HLC assessment approach, and these standards are likely to continue to evolve. Should be revised to suggest current best practices, rather than being so specific.	No changes to the document	We believe that this section is sufficiently general to allow for assessments that meet the varying practices adopted by institutions for student and program assessment
24	Page 11 (top bullet on page) states all field and clinical experiences are overseen by faculty members in the program. Direct faculty supervision is not possible with programs that use community preceptors unless they accept using “overseen” as a more general term to indicate “oversight and evaluation” of those experiences by faculty members in the program.	No changes made to the document	Overseen is meant to indicate “oversight and evaluation” and not direct supervision.
25	Page 29: the start of item 3 defines majors and degree programs as “a course of study within a discipline, which contains more than 30 semester (or 45 quarter) hours”. Since by OBR definition a Master’s degree can be exactly 30 semester hours, does this language imply that it is not a degree program?	Change made on p. 29 of 02.04.15 draft to indicate “30 or more”	Thank you
26	Pages 30, 31, 61-63, 66, etc.: numerous mentions of involvement by OBR in accreditation processes, with HLC and other entities. It is unclear what problem this new involvement intends to solve, and how OBR and the institutions will staff and manage all of this new state-level oversight. Having OBR representatives visit campuses with HLC and “national accreditation” review teams will be costly and cumbersome. Also, “Certificates of authorization” issued by the state are noted in many places, but as far as we can tell, the state currently does not issue them.	See comment 16 for changes made to the document regarding public institutions.	Certificates of authorization are for private institutions and have no relevance to public institutions. I think the reader must have been in a section of the document that is for private institutions.

27	<p>Page 59 Appendix C: General Education Guidelines: “Applied general education coursework cannot be counted toward meeting the minimum requirements for general education courses in associate or baccalaureate degrees.”</p> <p>– Why would OBR want to disregard applied general education courses that are already part of the transfer articulation guidelines? This seems inconsistent with College Credit Plus and guaranteed college level credit for technical certifications? How will this affect adult learners, which will become more important to institutions as high school demographics shift? Having OBR determine what applies to general education curricula needs to be carefully considered as the potential negative effects are obvious. It might be better if OBR were to work to assist with articulating the general education courses from Ohio’s neighboring states into the USO, which may increase the attractiveness and cost-competitiveness of our academic programs to out-of-state students; or to create a system of deemed equivalence (where if a student has satisfied a neighboring state’s gen ed requirements, s/he is deemed to have met Ohio’s, much like we do within the state under the OTM.</p>	No changes made to the document	<p>We are not disregarding courses that are part of the articulation and transfer guidelines, in fact the intent is to make this document consistent with articulation and transfer policy...previous guidance (e.g., the two year manual) was at odds with articulation and transfer policy.</p> <p>There may be a concern here that is coming from a misreading of the general education requirements as applied to baccalaureate degrees...we would be happy to discuss this concern</p>