

**Council on Postsecondary Education
September 22, 2011**

**Review of Existing Academic Programs:
Policy and Procedures**

ACTION: The staff recommends that the Council approve the attached policy and procedures for the review of existing academic programs.

KRS 164.020 (16) authorizes the Council to eliminate, in its discretion, existing programs or make any changes in existing academic programs at the state's postsecondary educational institutions, taking into consideration these criteria:

- a. Consistency with the institution's mission and the Strategic Agenda.
- b. Alignment with the priorities in the strategic implementation plan for achieving the Strategic Agenda.
- c. Elimination of unnecessary duplication of programs within and among institutions.
- d. Efforts to create cooperative programs with other institutions through traditional means, or by use of distance learning technology and electronic resources, to achieve effective and efficient program delivery.

The policy and procedures of the Council on Postsecondary Education related to review of existing academic programs have not been revised since 1999. The Council staff has worked with representatives from each public university and the Kentucky Community and Technical College System (Attachment 1) to agree upon definitions related to academic programming (Attachment 2) and update the policy and procedures related to review of existing programs (Attachment 3) in light of best practices, better coordination among state and institutional practices, and an improved connection between academic program approval and review of existing academic programs. The policy will be implemented in the 2013-14 academic year.

Academic Program Approval and Review of Existing Academic Programs:
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DEFINITIONS RELATED TO ACADEMIC PROGRAMMING

Academic Programs

An **academic program** refers to a combination of courses and related activities organized for the attainment of broad educational objectives that lead to a certificate or diploma or an associate's, bachelor's, master's, specialist, or doctoral degree.

Academic program modifications are of two types:

1. **Minor academic program modifications** refer to program name changes and changes in degree designation that do not involve significant changes in a program's purpose and curriculum.
2. **Major academic program modifications** refer to significant changes in the program's purpose and curriculum such that a different CIP code more accurately describes the revised program. Separation of an academic program into two programs and the combination of two existing programs into one program constitute major academic program modifications.

A Classification of Instructional Programs code, or **CIP code**, is a six-digit code in the form of xx.xxx that identifies instructional program disciplines. The CIP code supports the accurate tracking and reporting of fields of study and program completions activity as required for federal reporting.

A **major** is a primary area of study defined by a set of course and/or credit hour requirements within a specified discipline or with a clearly defined multi-disciplinary focus.

A **minor** is a secondary area of study that is separate from the major and is defined by a set of course and/or credit hour requirements within a specified discipline or with a clearly defined multi-disciplinary focus.

A **core** is a set of courses required by all students within a major or area. It also refers to the set of courses required by all students within a track, concentration, or specialization.

A **new academic program** is a program not previously offered at an institution or one that was previously offered but has been suspended for five or more years or has been closed.

An **area** is a primary field of study, typically consisting of more credit hours than a major that does not require a minor and can be completed in lieu of a major-minor combination.

A **track** is a set of courses designed to develop expertise within a major or area at the undergraduate level.

A **concentration** is a set of courses designed to develop expertise within a major or area at the master's level.

A **specialization** is a set of courses designed to develop expertise within a major at the doctoral level.

A program of **vocational-technical and occupational nature** refers to undergraduate certificate, diploma, technical, or associate degree programs designed to prepare students to enter the workforce immediately after graduation. The programs fall into categories/career pathways of: (1) Health Science; (2) Business Administration and Management; (3) Manufacturing; (4) Architecture and Construction; (5) Agriculture (Food and Natural Resources); (6) Hospitality and Tourism; (7) Human Resources; (8) Arts, Audio/Video Technology and Communications; (9) Information Technology; (10) Law, Public Safety, Corrections and Security; (11) Education and Training; (12) Government and Public Administration; (13) Marketing; (14) Science, Technology, Engineering, and Mathematics (STEM); (15) Finance; and (16) Transportation, Distribution, and Logistics.

A **suspended program** is an academic program that no longer accepts new students as of a specified date but allows current or previously accepted students to complete the program. The program can be reopened within five years without going through the new academic program approval process. After five years, if the program has not been reopened, it is considered a closed program.

A **closed program** is an academic program that is no longer offered by an institution and has been removed from the institution's catalog and the *Registry of Degree Programs*.

Academic Program Delivery Methods

An **accelerated course** refers to a course that can be completed in less than a traditional semester.

An **accelerated program** refers to the use of accelerated courses, credit for prior learning, and/or other methods to allow students to complete the program in less than the usual amount of time.

A **collaborative program** is an academic program under the sponsorship of more than one institution or organization and contains elements of resource sharing agreed upon by the partners. None of the participating institutions delivers the entire program alone, and the partnering institutions/organizations share responsibility for the program's delivery and quality. The credential awarded may indicate the collaborative nature of the program.

- If only one institution (primary) offers the degree or credential but other institutions or organizations (secondary) provide some resources, the program at the secondary institution(s) is registered on the Council's *Registry of Degree Programs* in an "**enrollment-only**" reporting category.

- If the degree or credential is offered by all institutions participating in the resource-sharing arrangement but only one institution is listed on a graduate's diploma, the program is registered on the Council's *Registry of Degree Programs* in an **enrollment- and degree-granting category for each participating institution**.

A **cooperative (work study) program** is an academic program that provides for alternate class attendance and employment in business, industry, or government.

Credit for prior learning refers to college credit for the college-level knowledge and skills gained from non-college instructional programs or life experiences, including but not limited to employment, military experience, civic activities, and volunteer service. Credit is evaluated through nationally standardized exams in specific disciplines, challenge exams for specific courses at individual institutions, evaluations of non-college training programs, and individualized assessments.

A **distance learning program** is an academic program in which the majority of the instruction occurs when students and instructors are not in the same place. Instruction may be synchronous or asynchronous.

A **100% distance learning program** is an academic program in which all of the required courses in a program occur when students and instructors are not in the same place. Instruction may be synchronous or asynchronous.

A **distance learning course** is a formal educational process in which the majority of the instruction in a course occurs when students and instructors are not in the same place. Instruction may be synchronous or asynchronous.

A **correspondence course** is a form of distance learning that is self-paced and involves the exchange of instructional materials and exams, by mail or electronic transmission, to students who are geographically remote from the instructor. Interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student.

A **dual degree program** is a formalized path of study that allows a student to pursue two different degrees at the same time, either at the same institution or at different institutions, and possibly complete them in less time than it would take to earn them separately. The two degrees could be in the same subject or in two different subjects; they could be at the same level (for example, two bachelor's degrees) or at two different levels (for example, bachelor's and master's degrees). Students must meet the admission requirements for both degree programs.

An **embedded program** consists of required courses of a lower-level degree or credential that are part of a higher-level degree or credential. Such programs usually do not admit students directly, and therefore, students may not be enrolled in these programs. Students are awarded a lower-level degree or credential as these programs serve as an exit option for students who do not complete the requirements for the higher-level degree or credential.

An **extended-campus program** is an academic program offered at any center, branch, campus, or other site at which postsecondary degree or nondegree work is offered, in addition to the parent campus. It refers to locations both within and outside an institution's area of geographic responsibility.

A **joint program** is an academic program that is sponsored by two or more institutions leading to a single credential or degree, which is conferred by all participating institutions. None of the participating institutions delivers the entire program alone, and all participating institutions and organizations share responsibility for all aspects of the program's delivery and quality.

- The program is registered on the Council's *Registry of Degree Programs* in an enrollment and degree-granting category for each institution participating in the joint program.

A **module** is a standalone segment/component of a parent course for which content (description, requisites, outline, competencies, and activities/experiments) has been determined and credit assigned. The sum of constituent segments is equal to the credit of the parent course. Credit is awarded upon successful completion of all modules comprising the parent course.

A **modularized program** is an academic program that can lead to interim credentials after completion of a specified number of courses.

Degrees and Credentials

A **degree** is an award conferred by a postsecondary education institution as official recognition for the successful completion of an academic program.

An **associate's degree** is an award that normally requires at least 60 semester credit hours or the equivalent.

A **bachelor's degree** is an award that normally requires at least 120 semester credit hours or the equivalent. This includes all bachelor's degrees conferred in a five-year cooperative (work-study) program and degrees in which the normal four years of work are completed in three years.

A **master's degree** is an award that requires the successful completion of an academic program of at least 30 semester credit hours or the equivalent at the post-baccalaureate, graduate, or professional level.

- A **professional science master's degree** program consists of two years of non-thesis academic training in science, mathematics, or technology and contains a professional component that may include internships and cross-training in business, management, regulatory affairs, computer applications, and communications. The program is designed with the input of one or more employers.

A **specialist degree** is an award that normally requires 60 semester hours of concentrated and approved graduate coursework beyond the bachelor's degree. It is generally offered in the field of education to acknowledge completion of advanced graduate study designed to help individuals meet licensure requirements or develop additional knowledge and skill beyond the master's degree but not at the doctoral level.

A **doctoral degree** is the highest award a student can earn for graduate study. The Integrated Postsecondary Education Data System recognizes three types of doctorates.

- A **doctor's degree—professional practice** is awarded upon completion of a program providing the knowledge and skills for the recognition, credential, or license required for professional practice. The total time to the degree, including both pre-professional and professional preparation, equals at least six full-time equivalent academic years. Some of these degrees were formerly classified as “first-professional.”
- A **doctor's degree—research/scholarship** requires advanced work beyond the master's level, including the preparation and defense of a dissertation based on original research, or the planning and execution of an original project demonstrating substantial artistic or scholarly achievement.
- A **doctor's degree—other** is a doctor's degree that does not meet the definition of a doctor's degree-research/scholarship or a doctor's degree-professional practice.

An **advanced practice doctorate**, also known as a **professional doctorate**, is a program of study beyond the master's degree designed to meet the workforce and applied research needs of a profession. It requires close cooperation between institutions and employers to ascertain employers' needs. The degree may or may not be necessary for the recognition, credential, or license required for professional practice. In most cases, it is a clinical program designed to meet the needs of allied health professions. It can be classified as either *doctor's degree—professional practice* or *doctor's degree—other* for IPEDS reporting.

Undergraduate (pre-baccalaureate) certificate is a subbaccalaureate credential granted upon satisfactory completion of a series of courses related to a specific topic or skill. It has the primary purpose of providing marketable, entry-level skills. These certificates qualify students to take external licensure, vendor-based, or skill standards examinations in the field. If standardized external exams are not available in the field of study, certificates prepare students at skill levels expected of employees in an occupation found in the local economy.

- **Postsecondary certificate (less than one academic year)** requires completion of an academic program below the baccalaureate degree in less than one academic year, or designed for completion in less than 30 semester or trimester credit hours, or in less than 45 quarter credit hours, or in less than 900 contact or clock hours, by a student enrolled full time.
- **Postsecondary certificate (at least one but fewer than two academic years)** requires completion of an academic program below the baccalaureate degree in at least one but fewer than two full-time equivalent academic years, or is designed for completion in at least 30 but fewer than 60 semester or trimester credit hours, or in at least 45 but less than 90 quarter credit hours, or in at least 900 but less than 1,800 contact or clock hours, by a student enrolled full time.
- **Postsecondary certificate (at least two but fewer than four academic years)** requires completion of an academic program below the baccalaureate degree in at least two but fewer than four full-time equivalent academic years, or designed for completion in at least 60 but less than 120 semester or trimester credit hours, or in at least 90 but less than 180 quarter credit hours, or in at least 1,800 but less than 3,600 contact or clock hours, by a student enrolled full time.

Graduate certificate is a post-baccalaureate credential granted upon satisfactory completion of a set of related courses within a discipline or a set of related disciplines. It has the primary purpose of supplementing or enhancing skills for degree-seeking students who wish to demonstrate competency in a high-demand or emerging area that will increase their marketability in local, national, and global markets.

- A **post-baccalaureate certificate** requires completion of an academic program equivalent to 18 semester credit hours beyond the bachelor's degree but does not meet the requirements of a master's degree.
- A **post-master's certificate** requires completion of an academic program equivalent to 24 semester credit hours beyond the master's degree but does not meet the requirements of academic degrees at the doctor's level.
- A **first professional certificate** provides advanced training and enhances knowledge in important areas of clinical or research specialization and specialty practice for individuals who hold a professional degree (e.g., J.D., D.M.D., or M.D.).

A **diploma program** is designed to prepare students for technical employment within a one to two-year period. A prescribed program of technical and general education courses is designed to prepare students for a specific job title, credit toward an associate degree, and continued training opportunities for certificate program graduates.

A **diploma** is a formal document certifying the successful completion of a prescribed pre-baccalaureate program of studies, either requiring less than one year or up to at least two but fewer than four years of work beyond grade 12.

- **Postsecondary diploma (less than one academic year)** requires completion of an academic program below the baccalaureate degree in less than one academic year or designed for completion in less than 30 semester or trimester credit hours, or in less than 45 quarter credit hours, or in less than 900 contact or clock hours, by a student enrolled full time.
- **Postsecondary diploma (at least one but fewer than two academic years)** requires completion of an academic program below the baccalaureate degree in at least one but fewer than two full-time equivalent academic years, or is designed for completion in at least 30 but fewer than 60 semester or trimester credit hours, or in at least 45 but less than 90 quarter credit hours, or in at least 900 but less than 1,800 contact or clock hours, by a student enrolled full time.
- **Postsecondary diploma (at least two but fewer than four academic years)** requires completion of an academic program below the baccalaureate degree in at least two but fewer than four full-time equivalent academic years, or designed for completion in at least 60 but less than 120 semester or trimester credit hours, or in at least 90 but less than 180 quarter credit hours, or in at least 1,800 but less than 3,600 contact or clock hours, by a student enrolled full time.

Miscellaneous

A **credit hour**, as defined in regulation by the United States Department of Education, is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than: (1) one hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately 15 weeks for one semester or trimester hour of credit, or 10 to 12 weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time or (2) at least an equivalent amount of work as required in (1) for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

Academic program implementation occurs when the first student matriculates into a program and enrolls in any course specified in the program of study.

Review of Existing Academic Programs

The review of existing academic programs, along with the approval of new academic programs, is one of the main responsibilities of state higher education coordinating boards. The purposes of these reviews include quality improvements, more efficient use of resources, accountability, and cost effectiveness. Typical criteria for the review of existing programs at the state level relate to quality, cost, duplication, employer and student demand, and reallocation of resources.

1. Background

From 1976 to 1987, the Council on Higher Education (CHE) conducted three reviews of existing programs. The first program reviews assessed all doctoral programs in the late 1970s. Then master's programs and bachelor's programs were assessed. After focusing on degree levels, the next two rounds of program reviews in the 1980s were conducted by discipline. In the 1980s, the Procedures for Review of Existing Programs noted that the four purposes of program review were to determine (1) which programs were operating well; (2) which programs needed to be improved and what resources would be required; (3) which programs were no longer needed in their present form; and (4) which programs were needed but not presently offered.

Focusing on disciplines was more useful than focusing on degree levels, but there were problems with that approach as well. The discipline reviews focused on productivity and duplication, but there were no specific criteria because institutions believed that criteria should vary by mission and institutional size. In addition, there were no clear objectives (e.g. generate dollar savings or decrease the number of programs), so there was also no agreement on acceptable rationales for maintaining programs.

After the review cycle in 1987, the CHE determined that the process should be redesigned with two concepts in mind: (1) institutions should be involved in the design of the new process and (2) the process should focus on program quality. The Council of Chief Academic Officers was charged with redesigning program review. A subcommittee of CAOs was created to develop a definition of quality, but it did not produce one that was accepted by all institutions. Staff and CAOs finally agreed that each institution would define quality for itself. Institutions then noted that the review process was duplicative of SACS and program-specific accreditation reviews. As a result, in May 1989, staff suggested to the CHE that program review activities be merged with statewide and institutional planning activities. The reasoning was that program reviews, especially the assessment of strengths and weaknesses and the determination of the appropriate program mix, would help shape strategic plans and then provide feedback on the implementation of the plans.

The redesign of the program review process, which began in 1988, was completed with the adoption of a new policy in November 1990. The updated policy's guiding principles were to:

- Promote the qualitative improvement of individual degree programs and institutions.
 - How are institutions defining and assessing quality?
 - How are institutions trying to improve quality?
 - Do institutions follow through on plans to improve quality?

- Ensure an array of degree programs appropriate to each institution's mission.
 - Are programs performing adequately? What are the strengths? What are the weaknesses?
 - Is the current array of programs meeting the needs identified in the statewide and institutional strategic plans?
- Contribute to planning activities at the institutional and state levels.
 - Has the consolidation of planning and program review been beneficial to both processes?
 - Is program review performing as desired in this new alignment?

As the policy was being revised, there were five expectations of program review extrapolated from the statewide plan for higher education:

- Provisions for assessing quality would be strengthened.
- New procedures should be comprehensive, i.e. contain a mixture of quantitative and qualitative standards which address quality, performance, cost effectiveness, contributions to institutional and statewide goals, and unnecessary duplication.
- Strengthening of undergraduate programs would take precedence over graduate programs.
- There would be increased scrutiny of programs and a more rigorous assessment of their viability and feasibility.
- Program review standards should be incorporated into the review of new programs to ensure quality and prevent unnecessary duplication.

It was agreed that outcomes of the program review process would be:

- Increased emphasis on qualitative considerations and program improvements over time.
- Improved coordination of programs based on institutional and statewide perspectives.
- Targeted institutional missions.

In 1991, the fourth round of reviews was implemented and focused on qualitative assessments that would lead to program improvements. The updated process recognized two categories of programs – nucleus and special. Nucleus programs were traditional liberal arts disciplines at the baccalaureate level that were considered “standard” at most universities. Nucleus programs were considered essential or highly desirable in operating coherent undergraduate programs. All other programs were considered special.

All programs underwent a qualitative review by the institutions, while special programs also underwent a quantitative review by CHE staff. Institutions created their own definitions of and criteria for quality, the reasoning being that the institutions were responsible for improving the quality of their own programs so they should also assume the responsibility for defining and assessing quality.

The quantitative review addressed productivity levels,¹ unnecessary duplication,² and disciplinary concerns. It analyzed items such as workforce shortages and surpluses, pass rates on licensure exams, rapid enrollment growth, and staffing and equipment problems. Each round (i.e., qualitative analysis by institutions and quantitative analysis by CHE staff) of reviews took two years to complete.

¹ Low productivity was defined as an average of fewer than 10 degrees awarded over a five-year period for certificate, associate, and baccalaureate programs; fewer than 5 degrees for master's and specialist programs; and fewer than 3 degrees for doctoral programs. Source: March 20, 1997 Memo

² Duplication was defined as programs offered by more than four institutions. Source: March 20, 1997 Memo

Staff assumed that actions taken by institutions to improve programs could be analyzed during the next program review cycle five years later. Most institutional reports did not include recommendations to suspend or withdraw programs. Program reviews were interrupted by Gov. Brereton Jones' Higher Education Review Commission and were officially suspended in October 1993.

In November 1999, the Council on Postsecondary Education (the Council) passed a series of guidelines related to academic programs that streamlined the process of reviewing programs and recognized the need for institutional flexibility within the new postsecondary structures of the Kentucky Postsecondary Education Improvement Act of 1997. The Council's Guidelines for Review of Academic Program Productivity established the following thresholds to be used to identify programs for review:

- Associate programs - average of fewer than 12 degrees awarded during a five-year period.
- Baccalaureate programs - average of fewer than 12 degrees awarded during a five-year period.
- Master's programs - average of fewer than seven degrees awarded during a five-year period.
- Doctoral programs - average of fewer than five degrees awarded during a five-year period.

After the policies were streamlined, the Council conducted four rounds of program productivity review. In the first round, the Council staff reviewed degree output from 1994-95 to 1998-99, and the Council approved the results in July 2001. In the second round, staff reviewed degree output from 1996-97 to 2000-01, and the Council approved the results in May 2003. In the third round, staff reviewed degree output from 1998-99 to 2002-03, and the Council approved the results in January 2005. At its January 30, 2006, meeting, the Council amended its Guidelines for Review of Academic Program Productivity to specify a four-year review cycle.

The most recent review was conducted in 2008-09 and examined degree output from 2003-04 to 2007-08. First, Council staff analyzed official degree data to identify associate, baccalaureate, master's, and doctoral programs at each institution that were below the thresholds. Next, staff notified institutions of those programs that were below the thresholds and asked them to apply an efficiency index to programs below the master's degree level.³ If the efficiency index for a program at the comprehensive universities was 540 or above, the program was considered to be productive and removed from further review. If the efficiency index for a program at the research universities was 360 or above, the program was considered to be productive and removed from further review. Finally, the institutions were asked to review each remaining low-productivity program and make written recommendations with supporting rationale for continuation, alteration, or closure of the program.

³ The efficiency index formula was defined as the total student credit hours in one year (fall and spring semesters) by program or department divided by the total FTE faculty (full-time faculty + 1/3 part-time faculty).

2. Policy

In 1997, KRS 164.020 was amended and provided the Council with additional guidance concerning program review. The statute allows the Council to eliminate or change existing programs at any public institution based on consistency with the institution's mission and the state's postsecondary Strategic Agenda, alignment with the state's postsecondary strategic implementation plan, unnecessary duplication, and interinstitutional cooperation. In addition, Goal 6 of HB 1 (1997) challenges postsecondary institutions to "deliver educational services to citizens in quantities and of a quality comparable to the national average." KRS 164.020 (16), HB 1 (1997), and *Stronger by Degrees: A Strategic Agenda for Kentucky Postsecondary and Adult Education 2011-2015* form the basis of the Council's program review policy.

- a. Institutions will conduct periodic reviews of approved academic programs. Each institution may create the forms and internal procedures for the review, but Council staff will require some uniform types of information from all institutions. Each institution will be required to include this information in its internal review process.
- b. New associate programs will be reviewed by the institution and the results forwarded to Council staff for review after three years. Upon a successful Council review, these programs will be placed on the regular institutional program review cycle.
- c. New baccalaureate programs will be reviewed by the institution and the results forwarded to Council staff for review after five years. Upon a successful Council review, these programs will be placed on the regular institutional program review cycle.
- d. New master's degree programs will be reviewed by Council staff four years after implementation. Upon a successful Council review, these programs will be placed on the regular institutional program review cycle.
- e. New doctoral programs will undergo an abbreviated interim review by Council staff after three years and a full review three years after the interim review. Upon completion of a successful abbreviated Council review, these programs will be put on the regular institutional program review cycle.
- f. In addition to newly approved programs, Council staff will review all existing programs based on each institution's review cycle. Programs will be subject to the same program review criteria as newly approved programs. Institutions will need to obtain historical data from existing programs in order to evaluate them based on the criteria outlined in the next section. For existing programs, institutions should provide data for at least five academic years.
- g. As required by KRS 164.295 (3), comprehensive universities must submit annual reports to the Council identifying the full cost of and all funding sources for each approved applied doctorate and the performance of each approved program.

3. Procedures

Institutions will submit the results of program reviews to Council staff for statewide review. Institutions may use previously established review procedures, but must include the following information.

Consistency with institutional mission/Strategic Agenda/strategic implementation plan will be evaluated by:

- a. Contribution to institutional mission.
- b. Contribution to economic and social welfare goals of HB1 as delineated in the statewide postsecondary education Strategic Agenda.
- c. Alignment with statewide postsecondary education strategic implementation plan.

Program quality and student success will be evaluated using:

- a. Evidence of attainment of student learning outcomes.
- b. External awards or other recognition of the students, faculty, and/or program.
- c. Average actual time and credit to degree.
- d. Employer satisfaction with graduates as measured by surveys and/or alumni satisfaction.
- e. Job placement or graduate school admission.
- f. Pass rates on licensure/certification exams (if applicable).

Cost and funding will be analyzed in terms of:

- a. Student credit hour per instructional faculty FTE.
- b. Extramural funding.

Program demand and unnecessary duplication will be evaluated using:

- a. Number of students enrolled and credit hour production.
- b. Number of degrees conferred.
- c. Explanation of how the curriculum is different from existing programs at other institutions or that access to these programs is limited.
- d. Explanation of pursuit of collaborative opportunities with similar programs at other institutions and how collaboration will increase effectiveness and efficiency.

Institutions will post the data for the program review criteria on the Kentucky Postsecondary Program Review System (KPPRS) as well as their recommendations for each program. Council staff will review the data and institutional recommendations to determine whether the program should continue without modification, continue with modification, or be closed within three years.

For programs that will continue with modification, institutions should submit a three-year plan for program improvements. Institutions shall submit a progress report and a recommendation for the program's future at the end of this three-year period. The Council staff will review the progress report and institutional recommendation and will confer with the institution before determining if the program should continue without modification or should be closed within three years.