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August 12, 2024

President Jay Rothman  
Universities of Wisconsin President  
1720 Van Hise Hall  
1220 Linden Dr.  
Madison, WI 53706

Dear President Rothman:

Per Regent Policy Document (RPD) 20-24, I am recommending that the Board of Regents approve the program discontinuance of UWM's College of General Studies and its three academic departments: Arts & Humanities, Math & Natural Sciences, and Social Sciences & Business. This letter and its attachments constitute my recommendation and report under RPD 20-24 (II)(G).

UWM proposes to close the College of General Studies ("CGS") and its three academic departments for two main reasons. First, there has been a precipitous decline (57.7%) in enrollments at the two campuses since the 2018 merger, which indicates little student and market demand as well as poor prospects for continued and future enrollments.<sup>1</sup> Second, because of the significant drop in enrollments, CGS's main program offering, the liberal arts associate degree, is no longer cost-effective when compared to the main campus bachelor's program. Continued investment in an environment of strained resources does not serve UWM's students, faculty, staff or the institution itself.

UWM does not make this recommendation lightly, especially given the effect on CGS staff and students<sup>2</sup> and the communities served by CGS. It is, however, the necessary and appropriate recommendation based on the realities and higher education environment in which we are operating. The designated faculty review committee supported the proposal, but the Faculty Senate did not. Therefore, this recommendation also contains compelling reasons for moving forward with the recommendation over the Faculty Senate's advice.

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<sup>1</sup> At the time of the mergers in 2018, UW Colleges institutions had already lost significant enrollments since their high point in 2010. UW-Waukesha was down 29% and UW-Washington County was down 36%.

<sup>2</sup> UWM has worked with its accreditation agency, the Higher Learning Commission, on ensuring it is meeting its obligations to provide "teach out" arrangements for impacted students. Further, UWM is assisting students who wish to transfer to other institutions. Students who choose to remain at UWM will pay the same tuition rate they pay in the College of General Studies (through 2027).

### **UWM Program Discontinuance Proposal Process<sup>3</sup>**

Per RPD 20-24, UWM circulated the program discontinuance proposal and sought faculty and other input as follows:

- The program discontinuance proposal was distributed to the faculty in the affected programs (all CGS faculty), the Faculty Senate, the Academic Staff Senate, the University Staff Senate, and the Student Association under RPD 20-24 (II)(C) on May 3, 2024. **The proposal is attached as Attachment A.** The UWM faculty designated the University Committee (UC), which is the executive committee of the Faculty Senate, as the faculty review committee under RPD 20-24(II)(D).
- As required, the UC distributed the proposal to CGS employees, CGS students, and UWM's employee and student governance bodies for a 30-day review and comment period. The UC created an online feedback form to accept comments on the proposal, and the proposal was also posted online so that any interested party could review it and comment.
- The UC received 36 separate comments from 35 individuals in response to the proposal's distribution and online posting. **The comments are attached as Attachment B.**
- The UC held eight open meetings between May 7 and June 17, at which it discussed the proposal and comments on the proposal.
- The UC issued a report in support of the program discontinuance proposal and distributed it to the Faculty Senate on July 24, 2024. **The UC report is attached as Attachment C.**
- Per RPD 20-24(II)(F), the chancellor consulted with the Faculty Senate and the University Committee about the program discontinuance proposal on August 7, 2024.
- As required by UWM Faculty Policies and Procedures § 5.65, the Faculty Senate voted on the UC's recommendation on August 7, 2024; the Senate rejected the UC's recommendation, by a vote of 24 to 11, with one abstention.
- As of the date of this letter, the Faculty Senate minutes have not been approved by the Faculty Senate, but UWM is providing the draft minutes to capture the Faculty Senate's discussion. **The Faculty Senate draft minutes are attached as Attachment D.**

### **Key Concerns Raised by the Faculty Senate and during the Proposal Process**

The program discontinuance proposal is to “close the University of Wisconsin-Milwaukee's College of General Studies (CGS) and its three academic departments” based on analysis of two considerations specified in RPD 20-24(II)(D):

1. Student and market demand and projected enrollment in the subject matter taught in the program.
2. Current and predicted comparative cost analysis/effectiveness of the program.

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<sup>3</sup> When UWM issued the proposal on May 3, 2024, CGS had 45 tenured faculty, one of whom was in his terminal year following the failure to attain tenure. Of the 44 remaining faculty, nine accepted retirement incentives and retired in May or will retire later this month. Five faculty have resigned. UWM estimates that 32 faculty will receive layoff notices if this proposal is approved.

70 nonfaculty CGS employees have already received nonrenewal or layoff notices depending upon their job category. UWM will transfer the Bridge program to the College of Letters & Science, and 13 academic staff who work in that program have been retained and did not receive nonrenewal notices. Letters & Science may still hire or retain additional CGS staff for the program, depending upon programmatic needs.

The proposal provides substantial analysis to support closure based on these two considerations. Nonetheless, five primary objections to the proposal were raised during the process. UWM addresses these main concerns below.

**1. The College of General Studies is not a “program” under RPD 20-24 and, thus, cannot be closed through this process.**

UWM is proposing to close the college itself, along with its three academic departments. These academic units were created formally by UWM in 2018 specifically to provide the academic home for the former two-year colleges at Waukesha and Washington County. UWM followed the approval process in its Academic Approval Matrix policy to recognize them formally.

Nonetheless, CGS faculty have argued that the college is not a “program” as defined under RPD 20-24, which provides as follows:

For the purposes of this policy, “program” shall mean a related cluster of credit-bearing courses that constitute a coherent body of study within a discipline or set of related disciplines. When feasible, the term shall designate a department or similar administrative unit that offers majors and has been officially recognized by the UW institution. Programs cannot be defined ad hoc, at any size, but should be recognized academic units. Programs shall not be defined to single out individual faculty members for layoff. For the UW System’s cooperative extension and continuing education functions, the term “program” also shall include the substantial equivalent of an academic department that may or may not provide credit-bearing credentials.

In arguing that the college is not a program, the comments have focused on one portion of the definition, “a related cluster of credit-bearing courses that constitute a coherent body of study within a discipline or set of related disciplines” to the exclusion of the full definition, which includes whether the institution has officially recognized the academic unit, which UWM and UWs have both for the academic departments and the college. Even focusing solely on that language, however, colleges exist for the purpose of offering “a related cluster of credit-bearing courses that constitute a coherent body of study within a discipline or set of disciplines” and meet the definition of a program under RPD 20-24.

Per RPD 20-24, a program closure involving faculty layoff must follow RPD 20-24. UWM’s Academic Approval Matrix, which explicitly addresses college and department eliminations, provides that it applies only to “academic program and administrative actions” in “situations that would not result in faculty layoff or termination,” making RPD 20-24 the operative policy for both the college and department closures.

Finally, in looking at the definition of “program” as a whole, it is intended to prevent layoffs targeted at specific individuals based on arbitrary program designations. There has been no argument that UWM is singling out these faculty or that the college and departments were not already recognized as academic units.

**2. UWM did not sufficiently consider all feasible alternatives to faculty layoff, such as absorbing the CGS faculty into main campus academic departments.**

RPD 20-24 indicates that “faculty layoff will be invoked only in extraordinary circumstances and after all feasible alternatives have been considered.” Sadly, many of the former UW Colleges campuses are in extraordinary circumstances, and many efforts were expended to drive enrollments and save costs long before Waukesha and Washington County were assigned to

UWM. As discussed in the proposal, the campuses had already seen significant enrollment declines prior to 2018, and in addition, the UW Colleges had conducted numerous enrollment initiatives, cuts and administrative realignments to turn around the campuses' financial situations. The 2018 mergers were themselves an effort to find better financial footing for the campuses by concretely aligning their futures with transfer to receiving institutions.

After the merger, UWM made significant efforts to shore up CGS's enrollments. The Office of Undergraduate Admissions, along with University Marketing & Communications and CGS faculty and staff, invested in multiple options for improving marketing and recruitment for the two campuses. As has been true at the other two-year campuses, they were unable to stop the overall slide in enrollments.

The main campus also collaborated with Waukesha County Technical College (WCTC) and in several bachelor's completion programs as part of efforts to make the Waukesha campus a thriving destination and keep more students on site. The programs in Nursing and Psychology, along with the proposed program in Business, were efforts to tap into fields identified by students and area business leaders as potential areas for growth. Those enrollments, however, were modest.

In addition, before deciding to propose program closure, UWM considered other options, such as incorporating CGS faculty into main campus departments, which was the Faculty Senate's primary suggestion. Unfortunately, this option was not feasible:

- UWM's main campus has also faced enrollment declines that have led to significant financial challenges. UWM's financial composite index, used by the Higher Learning Commission and the U.S. Department of Education, is a good indicator of the impact of these challenges. The index ranges from 0 to 10, and UWM currently sits at 2.47.
- The College of Letters & Science, where most CGS faculty would land, has seen a 41% enrollment drop over the last 10 years and has a structural deficit it is actively working to close, largely through staff attrition. Since 2014, tenure track/tenured faculty numbers in L&S have declined from 366 to 276, and they have further reduced staffing by 35 FTE in that time. To drive progress on budget targets, any staffing additions to L&S must, by necessity, be very focused and strategic.

At the Faculty Senate meeting, some faculty further argued that UWM was required to assess the faculty on an individual basis to conclude that there were no feasible alternatives to program closure. Such an individual faculty assessment, however, is not a feasible alternative to a full program closure. In addition to the above discussion of the infeasibility of absorbing the faculty into other units due to lack of need based on enrollments and longstanding budgetary constraints, the proposal is that the full programs should be discontinued due to insufficient market demand and the related severe cost ineffectiveness, with the result that faculty in the program will be laid off. Individual faculty have not been selected for layoff based on their professional obsolescence or another individual factor. The argument for an individualized assessment under these circumstances is an argument for alternative employment under Wis. Stat sec. 36.22(12) or reappointment under 36.22(13), which apply after layoff.

**3. CGS's budgetary issues are not sufficiently severe to necessitate CGS's closure.**

Several members of the campus community argued that that instead of closing CGS we should instead think creatively about how best to reduce the CGS overreliance on subsidies. These suggestions fall into three groupings:

- **Raise tuition.** Raising tuition in an environment with heightened competition and devastating enrollment losses is unlikely to be a workable strategy.
- **Cut the CGS budget.** Reducing the CGS budget such that the per-student instructional cost aligned with that of main campus departments would mean removing approximately 50% of its funding, which would have to be made up with non-faculty staff reductions, essentially eliminating the CGS ability to provide essential services.
- **Find funds elsewhere.** Any alternative reallocation of funds would rely on making substantial cuts to main campus offerings; we do not have funds available to make additional investment in CGS.

UWM is not proposing program closure based on CGS's overall budgetary situation. Rather, with the dramatically decreased enrollments, the program is not cost-effective, and the outsized GPR subsidization of CGS can no longer be justified based on current enrollments relative to other institutional budgetary demands.

**4. UWM's preservation of the First Year Bridge and Flex AAS programs suggests that CGS faculty should be retained to work in the programs.**

The First-Year Bridge program serves UWM students who apply to the bachelor's program whose academic record indicates they could benefit from additional academic support. The goal of the Bridge program is for students to progress to a bachelor's program upon conclusion of the Bridge program. The Bridge program has a long history at UWM that predates the 2018 merger with the two-year campuses.

During the pandemic, a campus task force made the decision to move the Bridge from a summer-only program to a full-year program; staffing and administration were provided by CGS, in part because CGS had the capacity to take on the expansion. Faculty are not assigned to the Bridge program as their tenure home. A number of faculty have taught in the program because they had capacity to do so due to declining enrollments in their home departments.

CGS faculty argued at the Faculty Senate meeting that CGS is responsible for developing Bridge into a thriving program. While the Bridge program has grown its enrollments each of the last two years, in part through the adoption of lower GPA standards for admission to the Bridge in 2024-25, Bridge is staffed primarily by members of the academic staff who are being retained. Transferring faculty on a full-time basis to Bridge would mean layoffs of the academic staff who built and administer the program.

The Flex AAS program is also being retained by the main campus. The Flex program is unique in that it does offer the AAS degree but is not a full-time teaching or tenure home for any instructional staff. Apart from the program director, staff are paid to perform assessments as an overload to their full-time duties. It is also not staffed, for the most part, by UWM employees. It is simply administered at UWM due to UWM's long-term commitment to collaborating with UW's on flexible options. The online AAS program, as a point of comparison, was completely staffed by CGS and is being discontinued.

**5. UWM did not adequately address faculty layoff rights.**

An additional criticism that appeared in comments to the University Committee and public comments, such as AAUP statements on the proposed closure, is that UWM did not refer to faculty layoff rights, including reappointment, in the proposal. While UWM understands the strong CGS faculty interest in their layoff rights and prospects for future employment at UWM, the proposal's purpose is to set forth the basis for the proposed program discontinuance.

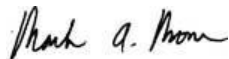
Faculty employment rights exist in state statute and are not changed or altered by not being addressed in the proposal. In addition to the statutory rights in Wis. Stat. § 36.22, UWM Faculty Policies and Procedures § 5.73 reaffirm those rights in UWM policy, and UWM has adopted UWM Selected Academic and Administrative Policy 7-17, Interim Policy on Reappointment for Faculty on Layoff, to establish the administrative process UWM will use to ensure that faculty reappointment rights are observed. The policy will be adopted on a permanent basis this fall, pursuant to UWM's policy making process. UWM understands its obligations to any faculty receiving layoff notices and will fulfill those obligations.

**Conclusion**

Based on the proposal and the above, UWM has provided a compelling rationale for closing CGS and its three academic departments. While regrettable, there are harsh realities facing higher education institutions nationally and in Wisconsin. The interest in two-year liberal arts associate degrees has declined so sharply that the continued operation of CGS and its academic departments is not supported by market demand, actual and projected enrollments, or cost effectiveness. Accordingly, UWM requests that you and the Board of Regents approve the proposal.

Please do not hesitate to contact me if I can provide additional information in support of the proposal.

Sincerely,



Mark A. Mone, Ph.D.  
Chancellor

c: Johannes Britz, UWM Interim Senior Vice President for Academic & Student Affairs  
Andrew Daire, Provost and Vice Chancellor for Academic Affairs  
Kathy Dolan, UWM University Committee Chair