

**UNIVERSITY SENATE  
UNIVERSITY AT ALBANY  
STATE UNIVERSITY OF NEW YORK**

Introduced by: Graduate Academic Council

Date: May 9, 2016

**PROPOSAL TO AMEND POLICY PERTAINING TO CERTIFIABLE  
FULL-TIME GRADUATE ENROLLMENT STATUS**

IT IS HEREBY PROPOSED THAT THE FOLLOWING BE ADOPTED:

1. That the University Senate approves the attached proposal pertaining to certifiable full-time enrollment status as approved by the Graduate Academic Council, to be effective commencing in AY2017-18.
2. That this proposal be forwarded to the President for approval.

## INTRODUCTION

The current definition of certifiable full-time enrollment at the graduate level is 12 credits, except for students who hold a full assistantship, in which case it is 9 credits, or who have advanced to doctoral candidacy, in which case it is one dissertation load credit. To meet the current 12 credit full-time requirement, students in the majority of graduate programs at Albany must take four courses. A four course load is often counterproductive to advanced learning when students are overwhelmed. This is especially true for international students who are required to study on a full-time basis. Each year, several international students reach out to the Vice Provost and Dean for Graduate Education to voice their concerns about the 12-credit policy. Faculty advisors, graduate directors, and both the previous and current Vice Provost for International Education have also voiced their concern over our current policy and have advocated for a change.

The Office of Graduate Education conducted a survey study of full-time enrollment policies at other research universities in the country and found that nine credits (or three full courses) per semester is the national norm. Nine credits, or three courses, is in line with the enrollment policy for full time graduate assistants at UAlbany. The three course load is widely recognized by faculty and students as an appropriate course load leading to an enriched learning experience for graduate students. Thus, it is recommended that the full-time enrollment policy be changed from 12 to 9 credits.

Changing the full-time enrollment policy to 9 credits offers several advantages to students and the University. It will result in a more manageable course load for all students – international and domestic – allowing for a deeper and richer learning experience. It will also increase our ability to recruit and retain international students. Potential applicants, including recipients of foreign government sponsorship and external fellowships, have expressed concerns about the 12-credit policy and may have been discouraged from applying by the policy. Changing the policy will also increase eligibility for study under GI benefit programs at UAlbany. Full benefits will become available for veteran graduate students enrolled for 9 credits per term. Eligibility for part-time veterans' benefits will expand when the corresponding half-time eligibility for such is dropped from 6+ credits to 5+ credits per term.

### *Scope of the Policy*

This policy **does not** impact the delivery of graduate programs or advice of faculty. There is no expectation that programs will have to modify their curriculum, course structure, or enrollment advice because of this proposal. For programs that offer four-credit courses, we expect program delivery and advisement to continue unchanged. Three courses per semester is the norm for full time study in such programs and there is no need to alter that practice to meet the goals of the current proposal. Programs that are structured and delivered on a cohort basis involving registrations of 12+ credits per term are also

not expected to change. The proposed policy **does not** alter or supersede the programs' structure established by academic departments.

This policy **does not** impact tuition & fee charges. There is a distinction between certifiable full-time enrollment (what this policy addresses) and tuition & fee rates. The UAlbany tuition & fee billing scale is set by the SUNY System, and specifies per term rates per credit up to 11 credits and a flat 12 + rate for enrollments beyond 11 credits. These billing rates will remain unchanged by this proposed policy regarding certifiable enrollments.

Individual graduate program credit requirements will not change with this proposal and, accordingly, tuition and fee revenue for each student over the course of study for each graduate degree program will also not change. There may be a slight lengthening of time-to-degree at the master's level should student enrollments adjust accordingly to the new policy, but assuming steady admissions based on instructional capacity, actual headcount enrollments per term should correspondingly increase.

## PROPOSAL

It is proposed that the University at Albany definition of certifiable full-time enrollment at the graduate level be amended from 12 credits to 9 credits as follows.

### Current policy:

Graduate students in full-time study shall ordinarily register for 12 or more credits each semester. Individuals who are employed or engaged in other significant activities are encouraged to adjust their study loads accordingly.

To be certified as in full-time study, graduate students must:

- be registered for 12 credits, or
- hold a full assistantship and be enrolled in 9 credits, or
- be registered for one dissertation load credit (courses numbered 899 only).

Graduate students enrolled for less than 12 credits per semester who are participating in program required full-time field work may also be certifiable as in full-time status, subject to the approval of the Dean of Graduate Education or the Graduate Academic Council, based upon the recommendation of the program faculty.

### Proposed policy:

Graduate students in full-time study shall ordinarily register for a minimum of 9 credits each semester, while some programs require enrollment beyond that level. (Tuition and fee charges for graduate

enrollments are distinct and credit-based as established via separate schedule in SUNY System policy.) Individuals who are employed or engaged in other significant activities while pursuing graduate education are encouraged to adjust their study loads accordingly.

To be certified as in full-time study, graduate students must:

- be registered for a minimum of 9 credits, or
- be registered for one dissertation load credit (courses numbered 899 only).

Graduate students enrolled for less than 9 credits per semester who are participating in program required full-time field work may also be certifiable as in full-time status, subject to the approval of the Dean of Graduate Education or the Graduate Academic Council, based upon the recommendation of the program faculty.

## ADVANCE CONSULTATION

(See Appendix A)

The following units have been informed and/or consulted regarding this proposed policy change. Some implementation issues, primarily IT related, have been identified and are referenced below. There is general support for the change. *Finance and Budget; Accounting and Student Accounts; Financial Aid; Institutional Research Planning and Effectiveness, Registrar, International Education, Enrollment Management, and Veterans' Affairs.*

## IMPLEMENTATION ISSUES

(See Appendix B)

The Offices of the Registrar and Student Financial Aid will require sufficient lead time for systems adjustments prior to implementation of the new policy.

## Appendix A

### **From Harvey Charles, Dean and Vice Provost for International Education:**

*The Center for International Education and Global Strategy fully supports the proposal to change the campus definition for certifiable full-time graduate enrollment from 12 credit hours to 9 credit hours. As the entity that supports the international student population in terms of immigration compliance, adjustment to the campus/local community and cross-cultural challenges, we are aware that this has been a concern and complaint of the graduate international student population for a number of years. The current policy means that for most graduate international students at U Albany, they must be enrolled in a minimum of 4 courses each semester. This is a challenge for native English speakers, but can be quite overwhelming for non-native speakers of English. A change in policy will allow students to have a course load that is much more manageable and therefore allow them to perform more successfully, have a richer learning experience as a result and possibly even have a positive impact on international graduate student retention.*

### **From Bruce Szelest, Vice Provost for Administration (and formerly of Institutional Research, Planning & Effectiveness):**

*Thank you for requesting Institutional Research input on the proposal that the University at Albany amend its definition of certifiable full-time enrollment at the graduate level from 12 credits to 9 credits. Jeff Gerken has undertaken a brief analysis based on the past full year of student FTE data, as SUNY calculates them, and found minimal impact on student FTE production, considering total campus student FTE is around 16,000 in fall semesters and 15,000 in spring semesters.*

*Since the policy will have the greatest impact on masters, or beginning graduate students, we looked at the following:*

- *If all the fall 2014 beginning graduate (G1) students with 10, 11, or 12 credits went to 9 credits the FTE loss = 137.*
- *If all the spring 2015 G1 students with 10,11, or 12 credits went to 9 credits the FTE loss = 106.*

*Currently, there is no allocation formula for state appropriation to campuses linked to FTEs, but student FTE is something that SUNY 'considers' in the context of campus budget setting. If SUNY ever goes back to a formula, it is something to consider, albeit the magnitude of this change would be relatively very small.*

*Not considered in this analysis is what the impact on tuition and fee revenue might be. While there may be some tuition revenue decrease within a given semester, moving down to 9 from 12 credits would also extend the time to graduation, so that might very well be a wash tuition revenue-wise in the long run.*

### **From Randi McGlaufflin, Veteran Services Coordinator, Student Financial Services:**

*Changing graduate full time enrollment status from 12 credits to 9 credits will positively impact our veteran and dependent of a veterans graduate students utilizing GI Bill benefits. When certifying GI Bill Benefits for a veteran or dependent graduate student the VA needs confirmation of their enrollment status (full time,  $\frac{3}{4}$  time,  $\frac{1}{2}$  time,  $\frac{1}{4}$  time, etc.). The student's enrollment status will impact their GI Bill benefit. For instance if the student is utilizing benefits under the Post 9/11 GI Bill then the enrollment status impacts the amount the student receives for their Monthly Housing Allowance. If less than full time the students Monthly Housing Allowance is pro-rated. If the student is utilizing benefits under the Montgomery Select-Reserve GI Bill (1606) or a dependent student utilizing benefits under the Survivors & Dependent Educational Assistance Program (CH 35) then their enrollment status impacts the amount they receive in their monthly stipend.*

*As we all are aware the tuition and fee charges are cheaper if a student is enrolled in 9 credits versus 12 credits. Therefore if a student can enroll in 9 credits and be considered full time they will be billed less and receive full time payment from their VA Educational Benefits. This will be better for the student from a financial standpoint.*

*The Post 9/11 GI Bill, under which a large percentage of UAlbany veteran students and dependent of veteran students qualify, pays a MHA (monthly housing allowance) only if their rate of pursuit is more than 50%. Therefore if 9 credits is considered full time, then 4.5 credits is considered  $\frac{1}{2}$  time (50% rate of pursuit). This lowers the standards/requirements to receive MHA and allows for more students to qualify for the MHA payment. In the meantime students who are currently enrolled  $\frac{1}{2}$  time (6 credits or less) and utilizing their Post 9/11 GI Bill are only eligible to receive the tuition and fee assistance and book and supply stipend. They are still being charged entitlement while yet unable to obtain the MHA, therefore not receiving all the benefits which the Post 9/11 GI Bill offers.*

*Also many of our veteran graduate students are considered non-traditional students as they have other obligations and responsibilities such as a spouse/significant other, children, jobs (full time or part time), etc. By allowing the student to take 9 credits and be considered full time they can better manage school and their other responsibilities. The student will be able to focus on the 3 courses (9 credits) and devote more time in studying to excel in the course and get the most out of it. The only downside is that by a student taking 9 credits versus 12 credits it will take an additional semester to complete their program as well as an additional semester of GI Bill Benefits, although I strongly believe that the above benefits supersede the shortfall.*

## Appendix B

### From Stephen Kudzin, Director, Office of Financial Aid:

*This document is in response to the proposal that the University at Albany definition of certifiable full-time enrollment at the graduate level be amended from an enrollment of 12 credits to an enrollment of 9 credits. As this policy proposal is moving forward, please consider the following information and share as needed.*

- *According to the National Association of Student Financial Aid Administrators (NASFAA), “Title IV regulations leave the determination of what constitutes the various enrollment statuses for graduate students to institutions. Once the institution determines what constitutes full-time enrollment, the less than full time statuses are specified proportions in relations to full time (i.e., half time is at least half of the minimum academic load of full time students). With this in mind, half-time enrollment would be half of what is considered to be full-time. Since 9 hours is full time, then 4.5 would be half-time. Since it appears that your institution does not offer 1.5 credit-hour courses, the minimum number of credits a student will need to be enrolled in is 5 credit hours to be considered half time for Title IV purposes.”*
- *Currently the ¾ time (or 9 credits) cost of attendance (COA) for in-state on campus students is \$25,443. This COA would only change in accordance with annual increases to the various cost components (i.e. tuition, fees, room & board, living, books, personal, travel and loan fees).*
- *Specific COA components, such as tuition, fees, and books are determined by the number of credits the student is enrolled for. Credit load is partly how we arrive at the student specific COA. Living expenses have no correlation with enrollment, unless the student is less than half-time.*
- *Assuming no other financial aid is awarded, a student will remain eligible for the entire \$20,500 Direct Unsubsidized Loan.*
- *Published time of completion should be reevaluated and most likely increased for all graduate level programs.*
- *If there is an inverse relationship between the time of completion (increase) and number of credits taken per semester (decrease), there is a likely unintended consequence of increased borrowing. Excessive borrowing leads to the potential for an increase in the number of students defaulting.*
- *There are a few current NYS Grants & Scholarships programs that grad students can receive. If we change the definition of FT from 12 to 9 credits, there would likely be an impact to eligibility. According to New York State Higher Education Services Corporation (NYHESC) the definition of FT for NYS G&S is, “The New York State Commissioner of Education defines full-time at collegiate institutions as enrollment for at least 12 semester hours for a term of at least 15 weeks, including exam periods, or the equivalent.” We have verified the definition of FT and PT with NYHESC, for additional information please refer to the following, particularly section 3.01e <https://www.hesc.ny.gov/partner-access/financial-aid-professionals/programs-policies-and-procedures-guide-to-grants-and-scholarship-programs/chapter-3-student-information.html>.*

- Graduate students can receive Veterans' Tuition Awards (VTA) as FT or PT students. We are required to report enrollment during certification. If a student is taking 9 credits, we would certify for PT eligibility. The student would receive 75% of the FT award. This would affect a few recipients on an annual basis.
- Graduate students who are FT at 9 credits would no longer be eligible for the NYS Math and Science Teaching Incentive Scholarship, unless they take 12+ credits per semester and earn 27 credits in the year. We generally have 2 recipients with an award of \$6,195 each.
- If this change does occur, it will require significant IT programming and changes to many processes. We would need ample time to ensure these changes are implemented.
- To be eligible to hold an assistantship, the graduate student must be registered for a minimum of 9 credits. No change to this rule is anticipated.

**From Karen Chico Hurst, University Registrar:**

The Registrar's Office submits the following list for consideration. While these items are all manageable, time will need to be devoted to implementation. Resources will be required from the Registrar's Office, the Business Enrollment Systems Team (BEST), and Enterprise Application Services (EAS). This list does not include modifications that need to be facilitated by Financial Aid or other offices affected by this change.

- Adjustments to the logic of the PeopleSoft generated enrollment verification.
- Adjustments to UAlbany's National Student Clearinghouse (NSC) enrollment file layout.
- Adjustments to setup tables with NSC for length of program; Subsidized Usage Limit Applies (SULA) and Gainful Employment (GE).
- BEST Reports the following:
  - Subsidized Usage Limit Applies (SULA)/Gainful Employment (GE) reporting: For program length, the National Student Loan Data System (NSLDS) considers 12 credits full-time and uses 12 credits full-time as its guideline for schools to determine the length of programs for SULA and GE.
  - If the campus definition of full-time changes, we'll have to update Academic Program tables (PeopleSoft) for all GRAD programs (SULA fields).
- We will be able to disable the Graduate Assistant Wiki (<http://www.albany.edu/registrar/forms.php>). Full-time graduate students enrolled in 9 credits/semester, with a full University assistantship, cannot be certified as full-time by NSC and must complete this form to receive an official Enrollment Verification Certificate. This results in a manual process that must be facilitated in the Registrar's Office. This would no longer be needed if the campus definition of FT changes to 9 credits/semester.
- Please clarify whether we would leave history as is when reporting a student's enrollment, specifically when a student has been enrolled over a period of time where we consider full-time to equal both 12 credits and 9 credits. Implications related to such a change would need to be investigated with NSC, NSLDS, and EAS.
- Adjustments may need to be facilitated with regard to student PeopleSoft Statute of Limitations and Expected Graduation Dates.
- We see no issue with Cross-Registration. The definition of FT resides with the home institution.



*While we feel this represents the most comprehensive list of changes at this time, additional items may present themselves as changes are facilitated. When/if this policy is adjusted, significant lead time will be necessary for the implementation of changes. Thank you for allowing us to consider these changes in advance.*