

October 22, 2025

University of Nebraska Executive Graduate Council c/o Dr. David Jackson
Interim Dean of the Graduate College
University of Nebraska System
djackson@nebraska.edu

Dear Members of the Executive Graduate Council:

On October 16, 2025, the UNL Graduate Council met to discuss and vote on the proposals from the UNL Chancellor to eliminate graduate programs in Community and Regional Planning; Earth and Atmospheric Sciences; Educational Administration; Textiles, Merchandising, and Fashion Design; and Statistics. Prior to our discussion of the specific programs, we also met briefly with UNL Executive Vice Chancellor Button, who offered information about the budget reduction process and the teach-out plans that would be developed for eliminated programs.

After substantial discussion of the process undertaken by the UNL administration in identifying programs for elimination, the information provided by the administration to justify their proposals, the information provided by each unit regarding their graduate programs, and the criteria for program eliminations outlined in the Graduate College Bylaws, the UNL Graduate Council members voted unanimously (10-0), by secret ballot, to retain each of the graduate programs proposed for elimination. Our evaluations of the program elimination proposals are summarized below to inform your upcoming discussion and vote on October 28.

Criteria for Program Elimination as outlined in the Graduate College Bylaws.

According to the <u>Graduate College Bylaws</u> (VI.D, pp. 42-43), there are nine reasons why a graduate program deletion or consolidation may be justified. These include:

- lack of need or demand for graduates (local, state or national);
- substandard quality;
- lack of adequate faculty or decline in quality of faculty;
- lack of adequate library holdings, laboratories or physical facilities;
- unnecessary duplication;
- transfer of a department or unit between colleges;
- lack of adequate financial support or a financial exigency;
- substantial increase in cost to continue program; or
- substantial savings affected by consolidation.

Additionally, the Bylaws state that when evaluating a program proposed for elimination, "the overall importance of each program must be considered within the context of the role and mission of each campus as promulgated by the Board of Regents." We drew from the Board of Regents Policies (pp. RP-21 – RP-22) and the UNL website (Role, Mission and Values | University of Nebraska—Lincoln) in identifying the appropriate context to consider. From these sources, we identified that key aspects of UNL's role and mission include:

- Serving as the primary research and doctoral degree-granting institution in the state for fields outside the health professions;
- Offering a broad range of undergraduate and graduate programs;
- Having primary responsibility for the land-grant mission of the University;
- Drawing on a diverse array of scholarly activities, including teaching, discovery, integration, and application;
- Providing leadership throughout the state through quality education and the generation of new knowledge; and
- Providing curricular development, teacher training, professional advancement, and enrichment activities to enhance the quality of primary, secondary, and other postsecondary educational programs.

After reviewing the Chancellor's proposed program eliminations against these criteria, we found no evidence that any of the affected graduate programs meet the standards for deletion established by the Graduate College Bylaws. Each of these programs demonstrate adequate enrollments and strong demand for graduates; have exceptional faculty with strong records of research in their fields; and offer critically important graduate degrees to support education and workforce development in the state. Many are unique within Nebraska, and even where comparable programs exist elsewhere, they are essential to UNL's distinctive mission and role within the state's higher education system. Eliminating these programs would diminish UNL's ability to fulfill its land-grant and flagship responsibilities: providing statewide leadership, supporting K-12 and postsecondary education, and sustaining the state's competitiveness in research, innovation, and workforce development.

There is no financial exigency, nor evidence of a documented lack of financial support for these specific programs. While we discussed whether the administration's claimed budget shortfall could meet that criterion, we concluded it cannot reasonably apply here. A temporary or discretionary funding decision by the administration does not constitute a bona fide lack of financial support as envisioned in the Bylaws. Accordingly, we determined that *none of the proposed eliminations are justified under the established criteria*.

Concerns about the Inaccurate Information Provided in the Program Elimination Proposals.

We also discussed our concerns about inaccuracies in the information provided in the program elimination proposals. For example, the justification for eliminating the master's program in Earth and Atmospheric Sciences notes that they only have had 5.8 degrees awarded over a five-year period (we assume this is degrees awarded annually). However, the Chair of Earth and Atmospheric Sciences reported that, depending on what five-year period is used, they average either 8.8 MS/year (period ending August 2025) or 9.2 MS/year (period ending August 2024). In any case, the Graduate Council found that these three numbers (5.8, 8.8, and 9.2) are larger than the minimum of 5 required by the Nebraska CCPE. The justification for eliminating programs in Textiles, Merchandising, and Fashion Design notes that it is not central to the mission of the

College of Education and Human Sciences, and yet the Dean of CEHS told the APC during the public hearing that he believes this department is, in fact, central to the College mission.

Similarly, the metrics information provided to the Graduate Council as a justification for the proposed program eliminations lacked appropriate context and scientific rigor needed for interpretation. For example, the justification for eliminating Statistics singled out "Completion majors (-1.38)" as an instructional outlier but failed to mention that this numerical value is not unusual because the department recently started an undergraduate program and will not have its first graduates until this academic year.

These and other inconsistencies/omissions lead to serious concerns regarding the information provided by the administration to justify program eliminations.

Concerns about the Validity of the Process Used to Identify Programs for Elimination. The Graduate Council members also raised serious concerns about the reliability and validity of the metrics used to identify programs for elimination. As "negative scores" on instructional and research metrics were used as primary justification for eliminating these graduate programs, questions about the quality of those metrics were central to our discussions.

A detailed analysis of the problems with the metrics and the methodology can be found in the <u>Department of Statistics' report to the APC</u> (see in particular appendices B and C). We recommend that the members of the Executive Graduate Council review these appendices for a full picture of the problems with the metrics and the methodology. As a summary, we highlight the following concerns related to our recommendation to reject the Chancellor's proposed graduate program eliminations:

- Inaccurate data used to inform the metrics have not been addressed. Many departments have questioned the accuracy of both the research and instructional metrics used in the budget reduction proposals, echoing discrepancies we identified between the program elimination proposals and departmental data. The administration has declined to share the underlying data for many metrics, and where departments have gained access, they have often discovered significant errors. When these concerns were raised, the administration responded that it was too late in the process to make corrections.
- Academic Analytics data are being misused as measures of research output. The administration's use of Academic Analytics (AA) data to justify program eliminations violates AA's own Principles and Guidelines. AA explicitly cautions that data must be interpreted within appropriate disciplinary contexts, yet the administration compared results across disciplines, removing that essential context. When faculty in Statistics reanalyzed the data using AA's recommended approach, examining SRI percentiles within disciplines rather than the university's improperly calculated cross-disciplinary z-scores, they found that many targeted departments were, in fact, among UNL's highest-performing units. AA also warns that its data "should not be deployed as a punitive tool to assess faculty members nor to deprive faculty members or units of resources." The administration's actions directly violate this guidance.
- Statistical analyses have been misapplied. Statistics faculty identified serious errors in how the administration constructed z-scores for both the research and instructional metrics. As they explained, "In the eagerness to create the right combination of values, the analyst conducting this analysis inadvertently did the statistical equivalent of dividing by zero." This error produced variables with no estimable mean and infinite variance—

rendering the resulting z-scores meaningless. Because these faulty z-scores were then averaged with others, all subsequent calculations were also invalid, providing "just one smoking gun suggesting that the metrics used in the analysis are completely unreliable."

Taken together, these issues call into question the validity and reliability of the metrics themselves and the methodology applied and thus cast doubt on whether any program eliminations based on these metrics and methodologies could be considered "bona fide."

Concerns about the Impact of Program Eliminations on Graduate Education at UNL.

The official mission of UNL states: "the university has primary responsibility in the state for graduate education, especially at the doctoral and professional levels." The proposed program eliminations are unacceptable because it directly goes against this stated mission. The impact of these proposed program eliminations on graduate education at UNL would be profoundly negative. In total, there are 332¹ currently enrolled graduate students who could be displaced by program eliminations, 9.13% of the total graduate student population² at UNL. The consequences would extend well beyond those currently enrolled, effectively shrinking UNL's graduate population by 9-10% for the foreseeable future. Fewer graduate programs mean fewer graduate students.

Critically, the metrics appear to have been unintentionally biased against graduate-heavy programs. Five of the 6 programs proposed for elimination (and 4 of the 6 programs proposed for merger) are in the top 25 departments at UNL by percentage of graduate enrollment. This likely resulted from the way that instructional efficiency metrics did not distinguish between undergraduate and graduate instruction. But the goals of graduate programs are different from those of undergraduate programs. Graduate programs provide advanced training and mentorship to produce the next generation of leaders in their professions and academic fields. Thus, it is typical and appropriate for a graduate course to have smaller enrollments than undergraduate courses. Graduate-heavy departments are not less efficient in their instruction than undergraduate-heavy departments, yet they are evaluated as such.

Concerns about the Feasibility of Teach-out Plans.

The program elimination proposals each state that "Current students will be allowed to finish their program, assuming timely completion." This is consistent with our obligation to provide fair and equitable opportunities for students to complete their programs, both ethically and in order to maintain our accreditation through the HLC.

However, our discussion with EVC Button raised several questions and concerns about our ability to maintain our obligations to students through teach-out plans, particularly given the potentially large number of students who could be affected. EVC Button outlined a timeline for teach-out plans that would be developed in the spring of 2026 and end in the summer of 2029.

¹ This number is actually an under-count. EDAD identified 25 students who for various reasons are not currently enrolled this fall semester but are actively pursuing their graduate degrees. This would raise the total number of displaced graduate students to 357, 9.75% of the total graduate student population. It is possible that the number could be even higher if there are students in other departments who are similarly pursuing their graduate degrees but not enrolled this fall.

² Total graduate student enrollment is 3638. This number does not include non-degree seeking students, students enrolled in intercampus programs, or "graduate visiting consortium" students.

This may be sufficient time for master's students and many doctoral students who are well into their programs of study. However, this timeline will not be feasible for many doctoral students who are in their first or second year of study. Per UNL Graduate Studies policy, doctoral students have eight years to finish their degrees. Expecting students to finish their degrees in half of this time is not reasonable for many students, particularly non-traditional students who work full time while completing their doctorate part time (as is the case for the vast majority of students in the EDAD doctoral programs, for example).

Additionally, the administration's approach to teach-out plans seems to assume that faculty in affected units will be willing to stay at the University throughout the duration of the teach-out plans (through June of 2029). This seems incredibly unlikely. EVC Button did address this possibility, explaining that we might have to rely on emeriti faculty to serve on committees, hire temporary lecturers or visiting faculty members, and/or draw on faculty in other departments to fill in the gaps.

We do not believe that the university will be able to provide high-quality graduate education during these teach-out periods under such conditions. In particular, EVC Button said that programs would still be expected to provide students with the research and practical learning experiences one would expect of a graduate degree program; that is unlikely if full-time, experienced faculty in affected units leave the university before the end of the teach-out plans. We have high standards for our Graduate Faculty and graduate programs for a reason.

Given the number of graduate students who would require a teach-out agreement, it may not be possible to develop fair and equitable teach-out plans that live up to the standards of a BIG10, R1, AAU-aspiring institution. Not only does this risk violating our obligations to our students but also could put our accreditation at risk.

Concerns about Negative Effects on the Graduate Faculty

Strong graduate programs depend on a strong graduate faculty. Beyond the impact on graduate enrollment, these proposed eliminations would severely weaken graduate education by undermining the broader faculty that sustains it. We believe the Chancellor's proposal has already damaged UNL's ability to recruit and retain high-quality faculty, and if implemented, that harm may be lasting.

Our primary concern is that these program eliminations—and the broader budget reduction proposal—threaten tenure and academic freedom at the University of Nebraska. According to Board of Regents Bylaws, tenured faculty positions can only be eliminated for adequate cause, extraordinary circumstances due to financial exigency, or through bona fide program discontinuations. Yet, as detailed throughout this letter, we find no evidence that these proposed eliminations meet that standard. The AAUP's Recommended Institutional Regulations on Academic Freedom and Tenure state that decisions to discontinue programs "will be based essentially upon educational considerations, as determined primarily by the faculty as a whole or an appropriate committee thereof." Eliminations that do not meet this threshold pose a direct threat to tenure and academic freedom.

Furthermore, both the proposals and our conversation with EVC Button indicate that the administration plans to reallocate state funding from eliminated units to selectively retain certain faculty members. Choosing which faculty to retain based on administrative preference

constitutes a clear violation of tenure protections and should concern all faculty across the NU system.

Ultimately, considering the issues highlighted in this letter, we are concerned that the proposed budget reductions amount to an end-run around tenure. If enacted, we are concerned that they will likely irreparably damage faculty trust in the institution and cause long-term reputational harm, making it far more difficult to recruit and retain talented scholars.

Conclusion

Given the concerns noted above and the clear lack of evidence that these programs meet the stated reasons for eliminating graduate programs at UNL, we strongly encourage the Executive Graduate Council to recommend retaining each of the graduate programs proposed for elimination.

Sincerely,

Members of the UNL Graduate Council:
Christopher Bilder, Physical Sciences
Rochelle Dalla, Social Sciences
Frauke Hachtmann, Humanities
Michelle Harvey, Arts and Architecture
Venn Jemkur, Graduate Student Representative
Tom Kubick, Business
Elizabeth Niehaus, Professional Education
Dai Shizuka, Agricultural and Biological Sciences
Colten Skinner, Graduate Student Representative
M. Can Vuran, Engineering