TO: Sang-Hee Lee, Chair
Riverside Division

FR: Richard M. Carpiano, Chair
Executive Committee, School of Public Policy

RE: [Campus Review] Department Proposal: Department of Society, Environment, and Health Equity (SEHE) - formerly known as the Department of Environment, Sustainability, and Health Equity (ESHE)

Date: November 22, 2022

The Executive Committee of the School of Public Policy has again reviewed the documentation for “[Campus Review] Department Proposal: Department of Society, Environment, and Health Equity (SEHE) - formerly known as the Department of Environment, Sustainability, and Health Equity (ESHE).” During the course of reviewing this latest revised draft, the SPP faculty also met with the SEHE proposal’s authors during SPP’s October 2022 faculty meeting to discuss their proposal. Also, some of our faculty and administration met with members of the Department of Environmental Science to hear their views and concerns on this proposed department.

In light of those meeting discussions and another extensive review of this revised proposal by our Executive Committee, we regret to say that this latest draft still does not satisfactorily address most of our concerns and the ongoing concerns of other Committees raised in reviews of their prior drafts. Additionally, our Committee and other SPP faculty members who reviewed the proposal noted that this latest draft contained factual errors, inaccurate claims (some about our School and willingness to engage with the proposal authors), and even logic fallacies such as “cherry-picking” data points and “bandwagon)/appealing to popularity (versus substance).

Beyond the specifics of this proposal, it is troubling that CHASS has posted a job ad for a faculty position for this proposed department when this proposal is still not even approved by Senate. We recognize that job postings are the prerogative of deans and the ad’s language enables a “work around” to hire someone legally for a department that does not yet exist. However, the act of proceeding with such a hire at this stage of the Senate review process—by both the Dean of CHASS and the proposal authors is a flagrant violation of joint campus governance. It also shows an outright disregard of this formal Senate review process that has now demanded extensive time and attention by Senate Executive Council and its constituent campus unit Committees in closely reviewing and discussing several draft versions. Ultimately, as noted by our committee, this job posting exemplifies the contention that we have raised in our prior
reviews: the need for university-level coordination of any proposed interdisciplinary programs that substantively intersects with other units throughout campus.

Below, we highlight our specific concerns on this latest draft. Given that our prior concerns have not been sufficiently addressed, rather than reiterate them here, we append our prior two reviews for the benefit of new and ongoing Executive Council members who may be unfamiliar with our concerns. Our comments are organized in terms of how we evaluated this proposal: matters related to SPP and matters related to the rest of campus (including CHASS and its students).

1. Concerns Related to SPP

a. SEHE has significant redundancies with SPP in terms of:
   i. our already-established major and minor curricula and two tracks in health and population policy and urban/environmental policy.
      Some examples from the current proposal draft:

      (p. 2) its curriculum is “…designed to prepare students for advanced study and community-based work related to social justice, environmental and health disparities.”

      (p. 73) (Course requirement) “One course in environmental politics, policy, and governance.”

      (p. 111) (Course requirement) “c) Three courses in health practices, politics, and policies”

      Much of our current teaching and training (including internships) focus on these areas. In their meeting with our faculty, some of the proposal authors claimed that there would be no competition with SPP. Yet, as detailed above, their curricula explicitly lists requirements for policy courses. Thus, consistent with our prior reviews, this suggests an avoidable situation of programmatic cannibalism.

2. Concerns Related to the Campus

NB: These are concerns that were raised by SPP and/or other ECs and Departments in prior review rounds or via discussions with CNAS stakeholders.

a. Redundancies with other programs on campus—notably Environmental Sciences (CNAS) and Medical and Health Humanities (CHASS) in addition to SPP.

   NOTE: In an effort to overcome these problems, the SPP EC have repeatedly proposed how there are exciting opportunities here for leveraging cross-campus synergies in environment, health, and their intersections to develop one or more truly campus-wide interdisciplinary programs that could be joint-governed (e.g., by CNAS, BCOE, CHASS, SPP) and provide students with a strong foundation in environment and health issues that span the natural sciences, social sciences, and humanities. Models of such efforts exist elsewhere, including
the multi-faceted, multi-track Environmental Studies program at UCSB and the Department of Health, Medicine, and Society at Vanderbilt University.

b. **Sustainability Studies is already a quickly shrinking major.** The proposal notes that SEHE will absorb Sustainability Studies (SUST), which is currently housed in GSST (and which wants to divest from SUST). SUST has been on a decline for several years. Yet, the proposal claims the program is growing. This is factually wrong, no matter which statistics are used. Per the UCR website, these are the Fall Headcount numbers from 2015-2022 (but declining trends are evident with other indicators too):

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By comparison over this same period with SPP and Environmental Science…

| Source: UCR Institutional Research [https://ir.ucr.edu/enrollments-programs](https://ir.ucr.edu/enrollments-programs)

Given these declining student numbers, we have concerns about creating a new department and major/minor programs that absorb SUST and divert scarce campus resources from programs with existing high student-to-faculty ratios in order to establish a new department to house what are essentially two smaller, minimally overlapping (in terms of faculty research areas) programs (see item c. below).

c. **SEHE has insufficient faculty to justify two new programs:** SEHE merges two areas with limited intersections into one department. This masks a significant problem: area-specific weaknesses for each of the two programs—especially for health. Many of the health-focused faculty do little to no research specifically related to environment/environmental health issues (e.g., Lee, Syvertsen, Nieri, Firat) and most of the environment faculty do no research related to health. Yet, the latest proposal draft states:

(p. 107) “The Health Equity Studies major does not require new faculty hires in order to begin accepting students. Four core faculty members are already faculty in CHASS departments, as are six affiliated faculty. One affiliated faculty member is in the School of Medicine, one in the School of Public Policy and one is in CNAS. Most of the proposed courses for the HQST major will be cross-listed with faculty’s home departments and therefore can be taught without any additional cost.”

d. **Inadequate science coursework for its environment and health equity tracks.**
Our consultation with CNAS department chairs and faculty since the last review revealed that the science courses included in the curricula (all lower division courses and not all immediately/optimally relevant versus being courses that do not have any/many pre-requisites) are insufficient for providing the necessary science foundations for environmental or health-related education.
e. **SEHE inadequately prepares students for careers it claims to train students for**

(p. 102) “HQST (the course code for Health Equity major) will also well-prepare our undergraduate students with a strong foundation to transition right into health-related graduate, medical and clinical programs at UCR, including in the UCR School of Medicine, the proposed Masters of Public Health program currently under development, and other graduate and medical coursework that includes a Designated Emphasis in Medical and Health Humanities.

This claim is entirely inaccurate—entry “right into” many of these programs (including pre-clinical programs) requires significant lower- and upper-division coursework in biology, chemistry, physics, and potentially even calculus.

f. **SEHE would create many substantial negative externalities for CHASS—overall and with respect to specific departments.** The proposal states that “The SEHE faculty have designed this program to accomplish large goals with minimal additional resources by drawing on existing faculty expertise.” Of course, that is impossible. Any time and courses dedicated to this program will come at the expense of existing departments in the following ways:

i. **SEHE will rely heavily on other departments to provide their courses.** The inclusion of three SPP (at least one of whom only attended one initial meeting and expressed concerns with this proposal) and other faculty listed as “supporting” the formation of this department does not help this problem and is misleading, especially given the abovementioned concern about program-related cannibalism and that SPP courses are not part of the SEHE curriculum, except in the few cases where an SPP course is cross-listed with a CHASS department.

ii. **SEHE will draw away faculty lines from high major (and high revenue-generating) departments.** Some of the departments for which SEHE faculty are currently appointed (Anthropology, Political Science, and Sociology) are already teaching many hundreds of majors and have very high student-to-faculty ratios. Presuming the proposal authors will all move to this new department, then ANTH, HIST, POSC, GSST, and SOC each stand to lose 1 (e.g., ANTH) to 3 (e.g., GSST and SOC) faculty to what will be a low enrollment department/program. These faculty members’ former departments will understandably need to replace them to cover their existing teaching loads (and SOC is already understaffed). Likewise, though Psychology faculty are not involved in this proposal, PSYC courses are extensively included in the SEHE curriculum. Yet, PSYC covers the highest teaching load in CHASS and have lost a substantial amount of faculty in recent years without replacement. In sum, CHASS already has substantial teaching load pressures. Despite this, the CHASS dean has recently promised SEHE a faculty line if the Department is approved (ad currently advertised).
g. SEHE is functionally two CHASS interdisciplinary programs and thus does not justify creating a new department to house them. CHASS currently has a very large number of low major interdisciplinary programs while five departments (Economics, History, Political Science, Psychology, Sociology) teach more than two-thirds of its undergraduates. SEHE is essentially two interdisciplinary programs housed under one roof, with few faculty who actually teach and do research regarding health (and whom do not work in the areas of environment—and vice versa).

Given this situation, we recommended in our last review that the proposal authors pursue one or two interdisciplinary programs for this instead of a department. Their response was that CHASS interdisciplinary programs are under-resourced. However, we contend that creating a department will not fix this resource problem and only draw resources away from existing departments.

Conclusion
We have made multiple, good faith efforts to provide the proposal authors with fair criticisms and constructive ideas and solutions to some of the issues we identified with the proposal and challenges it presents. Nevertheless, the proposal authors have not incorporated any of our suggestions while falsely claiming that we have neither met with them nor offered them ideas for helping them address our concerns. On the flip side, they have not provided us with any alternative ideas, expecting us to provide them all instead.

In light of our ongoing concerns raised from our multiple reviews of this proposal to date, the concluding paragraph from our last review memo nicely captures our current position on this proposal:

“Given the above issues, we arrive at the broader conclusion that there are aspects of these ESHQ (the dept. name at the time) major/minor programs that could be modified to make this a more unique, truly interdisciplinary initiative that is less co-opting and cannibalistic, more collaborative with existing campus units, and more beneficial to them and students seeking training in these areas. However, the need to create a brand new CHASS department (that monopolizes broad areas of campus research to name its own circumscribed focal areas) to offer a curriculum based on courses that are already extensively offered in existing UCR units in CHASS and beyond makes little practical sense in terms of student benefit and administrative burden. Lastly, given the enduring resource constraints on our campus, we find it difficult to support any initiative for a new department in the absence of new hires. In this case, CHASS would need to agree to replace the lines that will be depleted in existing departments if faculty move into this new department.”

In closing, there are many exciting models of cross-disciplinary, cross-campus undergraduate programs in the UC system and beyond focused on either environment or health. We appreciate the desire of the proposal authors to expand the coursework and training here at UCR on environment and/or health issues. However, as proposed, this department and its curricula will
not be competitive with those other programs, while drawing precious resources away from its college and the departments that already under high strain to meet student demand (in terms of majors and minors, as well as general education courses).

Sincerely,

Richard M. Carpiano, Ph.D., M.P.H.
Professor of Public Policy
TO: Jason Stajich, Chair
Riverside Division

FR: Richard M. Carpiano, Chair
Executive Committee, School of Public Policy

RE: [Campus Review] New Department Pre-Proposal: Department of Environment, Sustainability, and Health Equity (ESHQ) in CHASS

Date: June 10, 2022

The School of Public Policy Executive Committee (SPP EC) reviewed the revised and resubmitted proposal for a Department of Environment, Sustainability, and Health Equity (ESHQ) in CHASS. Upon close review, the SPP EC determined that:

a. the revised and resubmitted proposal still insufficiently addresses several significant, substantive concerns that we raised during our December 2021 review of the previous draft, notably evading a response to a very legitimate concern that we raised
b. the responses to the various concerns submitted by Executive Council committees raises new issues that we note below in detail.

Given these factors, SPP remains strongly opposed to this proposed department, its programs, and its procession to a Divisional vote. We stand by our contention raised in our previous memo that this proposed department has significant redundancy with existing programs in CHASS, CNAS, SPP, and elsewhere throughout campus and co-opted campus-wide strengths (Environment and Health Equity) for the benefit of a small group of existing faculty currently located in one college who wish to relocate to a new department focused on their specific interests.

Below, I offer new concerns and suggestions that arose in our review of this most recent draft. Also, for the sake of record and context (especially for the benefit of Executive Council members who may be previously unfamiliar), I append below our prior memo from December 2021 where we raised our concerns and suggestions pertaining to our review of the previous draft of this proposal—some of which were not addressed by the proposal authors in this revision.

1. **Redundancy:** The revised proposal discusses how “There is some productive and exciting overlap between the proposed B.A. degree in Health Equity Studies and the School of Public Policy’s Health and Population Policy undergraduate degree track” (page 4) but never addresses the original and reasonable concern about (a) redundancy and (b) potential cannibalism (an unfortunate potential consequence of the campus budget model, as often
honestly discussed in Senate Executive Council meetings). Though we raised these legitimate concerns in our previous memo, the authors’ response was evasive—claiming that our word choice was inappropriate (even though cannibalism is common terminology that we frequently encounter in the discourse of public policy, economics, political science, business, and other fields in which we engage) and retorting with a “red herring” point:

“Many of the authors of this proposal have supported SPP and SPP students with mentorship and teaching (including one third of the courses listed in the SPP ‘Health and Population Policy’ curriculum) for years.”

Though the authors’ response is off the point at hand, its focus on discussing existing courses organized around health (albeit as part of a non-CHASS program) actually substantiates our concern about redundancy with existing campus curriculum if a new program were created.

Our prior comments (see original memo below) on these two important matters were perhaps challenging. However, they were fair points, raised respectfully about a proposed program (not individuals) and in an effort to be constructive. These concerns were informed by our careful review of the proposal draft at that time and our earlier good faith efforts to meet with the ESHE proposal leadership to raise our concerns about programmatic redundancies and cannibalism and identify practical solutions to avert such undesirable outcomes. Therefore, given the extent of such practical concerns that we raised previously (which matter in terms of impact on the welfare of students, CHASS, and campus) the authors’ refusal to provide a response is unfortunate. Such refusal neither assuages these significant and legitimate concerns about the proposed initiative nor strengthens the proposal’s justification for this department and the programs it plans to offer. Instead and unfortunately, the response undermines the authors’ claims that they want to reach out and collaborate with other campus units. Given our efforts (via meetings, emails, and Executive Council memos) to voice our concerns to the authors about redundancy and potential programmatic cannibalism and develop beneficial solutions, such a response only serves to further reinforce our existing concerns about this initiative’s willingness to carefully listen to other campus members’ perspectives and potentially build cross-campus collaborations with them (as argued on pages 9 and 11 of this revised proposal).

2. The need for more science coursework in the curriculum. The foci of the proposed curricula sit at the nexus of the social sciences, humanities, and natural sciences. However, the scientific background that students will be required to take for such science-situated issues is still too limited (especially given the concern with providing students with sufficient—or ideally, better-than-sufficient—training for jobs and postgraduate training in many environment- and health-related programs).

Regarding the necessity of solid natural science (including statistics) training, we stand by our contention and constructive solution in our last review of the previous proposal draft:

“SPP faculty know well through their own involvement on policy panels and other advisement activities with decision-makers, many problems that we face in policy are based on ignorance of science. For issues related to environment, sustainability, and health
inequity, it is crucial for students to have some grounding in the natural sciences via a science component to the curriculum. This curricular need provides UCR with a unique opportunity to create a truly campus-wide, interdisciplinary major/minor program that is co-led by a steering committee of faculty from multiple colleges and schools across campus and, in doing so, ensures students receive a comprehensive interdisciplinary training experience in environment and sustainability or health equity.

3. Curricular Overlap in the Context of Strained Resources
   
a. CHASS currently has a very large number of low major interdisciplinary programs while five departments (Economics, History, Political Science, Psychology, Sociology) teach more than two-thirds of its undergraduates. At a time of fiscal constraint and limited FTEs, it is difficult to justify the need for such a department in CHASS. Specifically, the claim that interdisciplinary (non-departmental) programs do not get the attention they need is inadequate to justify creating an entirely new department—especially one that, per the construction of its curricula, is essentially two interdisciplinary programs housed under one roof, with few faculty who actually teach and do research regarding health (and whom do not work in the areas of environment and sustainability—and vice versa). Creating a department will not fix this problem. Furthermore, while there is some overlap between environment and health, there are many unique areas to both spheres that make housing such a pairing under one department awkward and even ironically niche. Ultimately, the proposal conceptualizes Environment, Sustainability, and Health (though the choice of narrowly focusing on “health equity” versus “health” more broadly is curious and not consistent with other programs throughout the US) as encompassing so much of everything that it lacks specificity. Yet specificity is essential in justifying its novelty as value-added campus programs and a department, as well as contending that the potential faculty who will be part of this endeavor encompass the intellectual breadth needed to sufficiently meet what the authors are ultimately promising to the campus and students.

b. In addition to impacts on units beyond CHASS, the proposal underestimates impact on existing CHASS departments given that the department will be formed by existing faculty moving their appointments out of their current departments and not via external recruitment. Notably, Sociology is down to 13 faculty members for more than 1000 majors. Three faculty members from Sociology are authors of this proposal (Lee, Nieri, and Reese). One can only infer that, if this proposal were to be approved, all three would move their appointments out of Sociology. If so, that would leave 10 faculty in Sociology—a loss of nearly 25% of faculty in a very small department that has a high teaching responsibility to CHASS. Likewise, History would lose two from its 25 faculty, GSST would lose three (25%) of its 12 ladder rank faculty, and, if author Ann Cheney moved from SOM to this new program, SPPM would lose one (25%) of its only four ladder rank faculty—at a time when that department is proposing a new graduate program (previously submitted to Executive Council for review).
This under-estimated impact also applies to consideration of existing, already-extended staff with the creation of a new department (page 49). It is easy to consider one’s own staffing needs, but difficult to consider how much impact such shared staffing proposals will have on established programs that are already under-resourced (as noted by the proposal). This includes grant administration (and the between-unit sharing of such personnel).

It is commendable that the future faculty are “actively seeking grant funding to bring resources to the university” (page 6). But, at risk of stating the obvious, submitted proposals for competitive funding are not the same thing as proposals funded and unreliable sources of income, especially given the relative size of humanities grants and the overall small number of faculty.

The proposal makes much of the collaboration of the designated faculty, but there is no evidence provided about any co-authored papers and co-PIs on grants from among the faculty listed on the front page of the proposal. For example, it was noted that the $500,000 UCOP grant listed was not under grants awarded. Who was the PI and the co-PIs of that grant? Research on cluster hiring indicates that these kinds of interdisciplinary programs work better when the members of the clusters have published or submitted grants together prior to formation of the cluster.

Appendix A of this revised proposal lists grants by faculty, but none of the grants listed show any indication of collaboration among any of the authors of this proposal. Also, many of the grants listed are expired (some several years ago) or will expire this year and some are by people not affiliated with the program (Bruce Link in SPP).

5. Departmental leadership. This revised proposal is now much clearer in identifying who are the faculty actually involved with this initiative. However, of the proposal authors—whom we presume will all move into this new department—only one is a full professor. The other faculty listed are associate and assistant professors. This is unusual and certainly not ideal for any department (at UCR or any other UC campus). Also, in terms of administrative and service workload, such rank composition presents numerous challenges—especially to junior faculty in terms of service.

In closing, we wish to re-emphasize a point from our prior review: given the broad intellectual expanse that this proposed department tries to encompass and bridge, there is great potential and need for this proposal’s ideas to manifest in the form of a truly cross-campus, interdisciplinary program—one that draws on the relevant scholarly and training strengths found throughout all of UCR’s colleges and schools for maximum benefit to students and the campus alike, in a manner that reflects the campus-wide intellectual and programmatic culture of many of our R1 peer campuses. This point is critical given the extent of such environment, sustainability, and “health, society, and culture” programs throughout the US and the substantial opportunity costs this new initiative will present to our resource-strained campus and the college in which it will be located.
in its current conception. The point here extends beyond this particular proposal to proposals in general: given opportunity costs and resource constraints, it is crucial for our campus to consider how such ventures can be developed in a manner that offers an improvement on what similar programs exist on other campuses versus simply matching or, worse, suboptimally trying to replicate those programs.

Sincerely,

[Signature]

Richard M. Carpiano, Ph.D., M.P.H.
Professor of Public Policy

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TO: Jason Stajich, Chair
    Riverside Division

FR: Richard M. Carpiano, Chair
    Executive Committee, School of Public Policy

RE: [Campus Review] New Department Pre-Proposal: Department of Environment, Sustainability, and Health Equity (ESHQ) in CHASS

Date: December 3, 2022

The Executive Committee of the School of Public Policy (SPP) reviewed and discussed “[Campus Review] New Department Pre-Proposal: Department of Environment, Sustainability, and Health Equity (ESHQ) in CHASS.” As faculty in an interdisciplinary school with research, teaching, community engagement, and professional training and internships focused on environment, sustainability, and health equity, our Committee recognizes the opportunities that interdisciplinary programs present for the campus. Nevertheless, for this specific proposed department, members raised a number of significant concerns with the proposal. In general, these concerns centered on how this proposal, in pragmatic terms:

a. attempts to establish a new department through engaging in, what appear to be, unproductive institutional cannibalism and co-optation—building its own fiefdom via feeding off existing campus units and cross-campus initiatives and
b. will generate student confusion due to the redundancies this department will have with already-existing majors and minors throughout campus with similar foci.

Specific issues are listed below in detail.

1. **“Health Equity” is inappropriate as the Department’s name.** The proposal outlines what is functionally a “Health, Medicine, Society and Culture” major/minor found at many other universities including Vanderbilt University and the University of British Columbia (for which one of our Committee members was its former chair). Yet, instead of using that or a similarly appropriate appellation, this proposal co-opt what is a well-established UCR campus theme and far-broader-than-this-proposal interdisciplinary field of scholarship, practice, and policy that has already been cultivated through many years of interdisciplinary collaboration between faculty located in all UCR colleges and schools, including SOM, SPP, CNAS, and CHASS. The UCR Center for Health Disparities Research is one prominent example of initiatives and collaborations that bring together the critical mass of faculty and students that our campus offers in health equity research and practice. Hence, to now take the focus for such a broad interdisciplinary area of research, teaching, and practice and apply it to this very narrowly-focused CHASS Department and major/minor monopolizes a truly collaborative campus initiative for its own self-interested ends. While there are many CHASS faculty concerned about issues in health equity, they do not have the patent on it. Thus using it in their program/department title gives the wrong impression that concern for equity and social justice is only a humanities and social science concern and not something that faculty throughout campus focus on in their research, teaching, and service. Intellectually, this is akin to if Economics requested to start a major in “Applied Math,” completely ignoring that many other units on campus also actively engage in research, teaching, and training on the subject (e.g., Mathematics, Statistics, Engineering, Computer Science, Psychology, GSOE, BUS, SOM, and SPP).

2. **Faculty Resource Scarcity and Sustainability:** Several items were raised for this issue.
   a. The proposal includes numerous courses taught by SPP faculty. However, SPP is unable to offer many of these courses every year—including PBPL 010, which is listed as part of the core curriculum and not as an elective.

   b. Given the extent of PBPL courses included in the proposal, concern was raised about potential requests for cross-listing our courses with the new program. SPP’s current policy is to not support cross-listing PBPL courses due to high student demand among majors/minors.
c. If the creation of this department means that some units throughout CHASS will lose faculty, then it is difficult to see how the departments these faculty leave behind will be able to continue offering the same range of courses as they do now—many of which are listed as being necessary to comprise this major/minor. Sociology offers an instructive example. In the past two to three years, it has lost multiple faculty and is struggling to maintain its current teaching demands. If faculty leave SOC to join this new department, their current situation will only become more fraught, further undermining its ability to admit non-majors into many of its courses. The proposal does not indicate how an EHSQ department would be able to regulate outside course offerings to ensure their consistent availability so as to avoid a bottleneck for these majors/minors.

3. **Who Is Actually Involved in This New Department?** On page 2, the proposal includes a long list of faculty from various units all over campus, but uses vague language that obfuscates who actually is or is not planning to be involved with this potential department. This gives the impression of padding to make the potential department look more significant than it really is—especially considering that Environment, Sustainability, and Health Equity are far more distinct than overlapping in many areas of their respective foci (especially Health Equity vis-à-vis the Environment and Sustainability) and in terms of what specific faculty have scholarly and teaching expertise in. For example, three of our SPP colleagues are included on the list. When we asked them what their involvement was to understand the proposal better, all three indicated they attended a meeting and offered to have a course they teach be part of this curriculum, but never agreed to be involved with the department or indicated wanting to relocate their appointment. Furthermore, it is necessary to recognize that, while faculty members may develop a course and teach it regularly, the term-specific scheduling of course and which faculty member is assigned to teach it both fall outside faculty control.

4. **The letters of support do little to justify specifics as to why this should be a new department or even new majors/minors.** The support letters listed in the proposal cherrypick particular comments from the letter writers, but, beyond broad platitudes (some by people with little familiarity of the social sciences and humanities in general and/or with regard to the three areas of environment, sustainability, and health equity; and some from campus units with no involvement in teaching undergraduates or at very least teaching undergraduates from these majors/minors like the BCOE dean), do little to justify specifics as to why this should be a new department or even new majors/minors. Further concerning is how the SPP Associate Dean Kurt Schwabe is listed on page 11 under a section that includes all unit heads with affiliated courses who have approved this proposal. Associate Dean Schwabe’s letter is listed as “Pending,” which, by inclusion in this section, gives the impression that he approves of this proposal/initiative, but has just not submitted his letter. Knowing this background makes us
question the extent and degree of campus support, particularly from other unit chairs and directors, as expressed in the proposal.

5. **Why is the Subject Code already approved?** It was brought to our attention that the subject code for ESHQ has already been approved (and now under review again for a modification to this subject code). Why was this request granted for a department that has not even been approved to exist?

6. **No Science Component:** As SPP faculty know well through their own involvement on policy panels and other advisement activities with decision-makers, many problems that we face in policy are based on ignorance of science. For issues related to environment, sustainability, and health inequity, it is crucial for students to have some grounding in the natural sciences via a science component to the curriculum. This curricular need provides UCR with a unique opportunity to create a truly campus-wide, interdisciplinary major/minor program that is co-led by a steering committee of faculty from multiple colleges and schools across campus and, in doing so, ensures students receive a comprehensive interdisciplinary training experience in environment and sustainability or health equity.

7. **Low Unit Bearing Major:** The health equity major only requires 48 units, which, compared to other UCR majors is very low and leaves it up to students to figure out how to make up the remaining credit hours they need to graduate.

8. **Disparity in Training across the Three Data Analysis Course Options.** Choosing from one of the three options means that students will graduate with vastly different levels of data literacy required for engaging in discourse of environment, sustainability, and health equity. Statistics courses like STAT 010 provide a broad, essential foundation for interpreting and engaging in research while PBPL 010 and STAT 004 respectively cover highly specialized topics in Geographic Information Systems and Data Science, but do not provide students with foundational skills to interpret research and even be prepared for many jobs listed in the proposal’s appendix as well as graduate training in the social sciences, public policy and administration, as well as public health and other health sciences.

9. **The Justification for a New Department is Insufficient.** Question 3 on page 129 offers weak rationales for needing to form a department. Notably, it conflates the activities of a research center with that of an academic department, the latter of which is a far broader administrative unit in terms of its activities. Realistically, no department or unit on campus (or elsewhere) has the extent of collaboration that is detailed in this section and, given the faculty who will likely be associated with the new department, it is unreasonable to conjecture that the new department will be anything different. One only has to look at SPP, a cohesive, supportive unit of teaching,
research, and engagement with a robust, successful program of faculty research, yet only a few collaborations between existing faculty. Hence, speaking from experience, the authors’ claim that “Consolidating our efforts into a department will enhance our ability to obtain competitive multidisciplinary research grants” is untrue and unrealistic.

10. **The Proposal needlessly tries to justify creating a New Department by conflating it with new major/minor programs.** Overall, it is difficult to read this proposal and not view it as the creation of new curricula to justify a new home for faculty who may, unfortunately, feel unhappy in their existing CHASS departments. There already exist ample teaching/mentoring, research, and community engagement opportunities throughout campus for faculty interested in these topics (e.g., CNAS, Global Studies, SPP, Center for Health Disparities Research). Notably, SPP offers many such opportunities as an existing program and is welcoming of petitions to serve as cooperating faculty. Given the extent to which the curricula are already based on existing courses offered throughout CHASS, there is no need to have a department to support these new majors.

**Conclusion**

Given the above issues, we arrive at the broader conclusion that there are aspects of these ESHQ major/minor programs that could be modified to make this a more unique, truly interdisciplinary initiative that is less co-opting and cannibalistic, more collaborative with existing campus units, and more beneficial to them and students seeking training in these areas. However, the need to create a brand new CHASS department (that monopolizes broad areas of campus research to name its own circumscribed focal areas) to offer a curriculum based on courses that are already extensively offered in existing UCR units in CHASS and beyond makes little practical sense in terms of student benefit and administrative burden. Lastly, given the enduring resource constraints on our campus, we find it difficult to support any initiative for a new department in the absence of new hires. In this case, CHASS would need to agree to replace the lines that will be depleted in existing departments if faculty move into this new department.

Sincerely,

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