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TO: Ken Barish, Chair
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FR: Kurt Schwabe, Chair
Executive Committee, School of Public Policy

RE: **[Comments] Systemwide Review of Presidential Interim Policy for the University of California's Use of Online Program Management Companies**

Date: October 13, 2025

The Executive Committee of the School of Public Policy has reviewed the **Systemwide Review of Presidential Interim Policy for the University of California's Use of Online Program Management Companies.** We appreciate the effort and recommendations provided by the Online Program Management Workgroup in developing guidelines on issues surrounding instructor transparency, course evaluations and student feedback, and as well as prohibitions against incentive-based compensation for recruitment, admissions, or awarding financial aid. With that said, we have a few additional thoughts that we hope will be useful to consider.

First, there appears to be no current policy regarding the use of revenue sharing (or fee for service) arrangements as they relate to use of OPMs. It is fairly common for OPMs to retain 40-60 percent of student revenues (i.e., tuition)[1] when using a revenue sharing model, sometimes for the student's entire academic career. Thus, implementing OPMs could potentially have significant impacts for academic programs and colleges. Awareness, transparency, and monitoring of these sharing agreements would be useful, even for programs across the UC system to better understand what the "market" looks like.

Second, and related to the first point, there appears to be no current policy regarding the ability of students to receive university or campus-based financial aid (such as graduate assistantships) if they are recruited to online classes via OPMs. Given the revenue structure that is typical of OPMs, some universities do not allow students recruited by OPMs to receive any sort of university or campus-based financial aid. This structure could again potentially have significant impacts for academic programs and colleges.

Third, there appears to be no current policy regarding the ability of a student who has been recruited by an OPM into online courses to either take some amount of classes on campus or fully transfer to an on-campus version of an academic program (or vice versa), and what the revenue implications for such students would be to academic units.

[1] See, for example, page 10 of the following report: https://www.p3edu.com/wp-content/uploads/2022/03/P3%E2%80%A2EDU-100.pdf

Fourth, Section II of the policy explains that OPMs may be used for “recruitment, marketing, technical support and student support services.” There could be increased guideline and monitoring of how OPM efforts in these areas intersect with current campus efforts. For instance, how would the use of OPMs interface with existing UC campus recruitment, marketing, technical support, and student support services, if at all? How would the UC ensure that current program information is provided by OPMs?

Fifth, Section III.A.3.a of the policy references the use of external instructors provided by OPM companies to deliver University of California courses. Although the interim policy does state that external instructors meet the same or equivalent academic/professional standards as either campus-employed faculty (for degree programs) or contracted instructors (for non-degree programs), the Executive Vice Chancellor and Provost are listed as the enforcement mechanism for this policy, which appears to be a review of websites and marketing materials (see Section III.A.4). The vetting, appointment, and reappointment process for external instructors provided by OPMs is not currently mentioned in the policy. Consistent with shared governance, academic units should have input as to the use, vetting, appointment, and reappointment of OPM-provided instructors.