

DEFINITION OF “UNIVERSITY” IN NEW YORK STATE

HIGHER EDUCATION COMMITTEE
MAY 7, 2019

Adopted by the Regents in 1969, the Current Definition of “University” in NYS (Commissioner’s Regulations §50.1(l)):

(l) *University* means a higher educational institution offering a range of registered undergraduate and graduate curricula in the liberal arts and sciences, degrees in two or more professional fields, and **doctoral programs in at least three academic fields.**

There is no definition for “academic fields” in Regents Rules or Regulations. However, Regents Rule 3.47 distinguishes between “academic degrees” and “professional degrees.”

“Academic degrees. Graduate academic degree programs consist of advanced studies in an academic discipline. They must have as their purpose contributions to knowledge of the subject matter, rather than specific applications of knowledge to professional practices. Master's degree programs of this type may be terminal in nature or may also provide an introduction to research and advanced study at the doctoral level. Such programs emphasize theory and are not primarily designed as preparation for professional careers. Graduate academic degree programs leading to the doctorate shall include research that prepares the graduate student for a life of scholarship in an academic discipline.”

The only doctorate-level degrees recognized in Regents Rule 3.47 as an “academic doctorate” is the Doctor of Philosophy (Ph.D.)

“Professional degrees. Graduate professional degree programs must be comprised of advanced studies in professional or vocational fields. While they may have strong theoretical underpinnings, they must have as their primary purpose knowledge for application in professional practice. Master's degree programs of this type are primarily terminal in nature. They may serve as preparation for advanced studies at the doctoral level, but they shall not be designed primarily for this purpose. The doctorate in such studies is likewise practical, insofar as it prepares the student to train or supervise others in the field, to discover new knowledge that has practical application in the field, or to prepare the student for a life of practice in the student's particular profession.”

All doctorate-level degrees, other than the Ph.D. are recognized in Regents Rule 3.47 as “professional doctorates,” for example:

Doctor of Chiropractic (D.C.)

Doctor of Dental Surgery (D.D.S.)

Doctor of Education (Ed.D.)

Doctor of Engineering (D.Eng.)

Doctor of Medicine (M.D.)

Doctor of Ministry (D.Min.)

Doctor of Nursing Practice (D.N.P.)

Doctor of Nursing Science (D.N.S.)

Doctor of Occupational Therapy (O.T.D.)

Doctor of Pharmacy (Pharm.D.)

Doctor of Physical Therapy (D.P.T.)

Doctor of Professional Studies (D.P.S.)

Doctor of Theology (Th.D.)

Doctor of Veterinary Medicine (D.V.M.)

- New York State is the only state that has any requirement for doctoral programs in order to use the term “university” in the title of an institution.
- Massachusetts had a requirement for 3 doctoral programs until 2010, and no longer requires any doctoral programs to use “university” in the title. Massachusetts does require that “universities” have programs in four or more distinct professional fields, which is not required in New York’s regulations.
- The statutes that created SUNY and CUNY systems name and/or define institutions within those systems.

- Some independent colleges have requested that they be permitted to change their names to use “university” instead of college. In support of their requests they have raised issues including:
 - ✓ Colleges are at a competitive disadvantage in recruiting students from outside the U.S., where, in some cases, the term “college” refers to a secondary school.
 - ✓ In 1969, when the regulatory definition of “university” was established, some independent institutions which were already using the term “university” in their names were grandfathered-in, despite not meeting the newly established definition.

Options:

- Define which doctoral programs are included in the current regulatory requirement for “doctoral programs in at least three academic fields.”
 - Only Ph.D. programs?
 - All doctoral programs?
 - All doctoral programs except those leading to professional licensure?
 - What constitutes an “academic field” ?
- Amend the regulation to eliminate the requirement for any doctoral programs, consistent with other States.

Recommended Next Steps:

- The Department recommends conducting a survey of all IHEs to gauge interest in, and suggestions for, either amending the regulatory definition to make clear which doctoral programs are and are not included in the definition, or to eliminate the requirement for doctoral programs altogether.
- We will bring the results of the survey back to the Regents at a future Board meeting, at which time the Board can determine how it wants to proceed on this issue.