

Credits and Hours at CUNY

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Yesterday, VC Logue sent a request asking if anyone knew of any legal requirements governing the relationship between credits and contact hours at CUNY. I found Federal regulations that do indeed define what constitutes a credit hour. And since the context is student aid, it most clearly applies to CUNY. Before citing chapter and verse, I'd like to offer my "executive summary and interpretation." The usual disclaimers about legal expertise apply, of course.

The Federal definition is based on the "Carnegie formula" we are all familiar with: one hour of class time plus two hours of preparation time per week for fifteen weeks gives one "course credit." But the Federal definition does *not* pin down exactly how to map particular course components to credit hours. Rather than say, for example, that two hours of lab is equivalent to one hour of classroom instruction, the definition simply says, in effect, that a three credit course requires 9 hours of work, and makes the institution responsible for allocating those hours to whatever course components it wishes.

Thus, if the institution can show that a 3-credit "lab-only" course requires an additional six hours of preparation time, that's perfectly permissible. However, conventional science laboratory sections require much less outside preparation time, making the 2:1 ratio the norm.

My interpretation is that Pathways is designed to facilitate student progress, neither reducing nor increasing the academic content of courses. The "3 hr; 3 cr" restriction was intended to make sure students are not required to spend additional "clock time" beyond the normal requirements of a conventional 3-credit course that has only a conventional classroom instructional component. But given the Federal definitions, it's clear that the restriction needs to be re-cast to make it clear that all Pathways courses must require just 9 hours of student work per week: "3 hr; 3 cr, or equivalent."

I'll add that setting this matter straight can help address the issue of how to assign credits to courses that incorporate emerging technologies, such as online content delivery, that were not anticipated by the Carnegie Foundation when it established the 45-hour work-week norm for college students a century ago.

Also, I would point out that the "learning outcomes" language in the Federal definition raises, but does not resolve, the significant issue of differentiating between time spent and material learned. As a computer scientist trained as a learning theorist, I'd say the resolution to that issue awaits the development of a way to quantify "knowledge" as effectively as we are currently able to quantify "information."

The definitions are given in Section 600.2 of Subpart A of Part 600 of the Federal Regulations for “Institutional Eligibility Under the Higher Education Act of 1965, Amended.” They are available online at <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=702c7e87ace35f7eefc7466b2beb3c3f&rgn=div8&view=text&node=34:3.1.3.1.1.1.23.2&idno=34>:

***Credit hour:* Except as provided in 34 CFR 668.8(k) and (l), a credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than —**

(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or

(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

Online searches will turn up many references to this regulation and discussions of the rationale and intentionality behind it. Basically, the Federal government wants to make sure the 150 billion dollars in student aid it dispenses annually are spent responsibly, but it does not want to place artificial restrictions on the way colleges and universities pursue their educational missions.

The one constraint that applies to CUNY is that all courses must meet national norms (9 hours of work per week for 3 hours of credit) if its students are to be eligible for financial aid.

Using the Baruch course that VC Logue shared with us as an example: there is nothing wrong with a 3-credit “lab only” course, provided it demonstrably requires 9 hours of student work per week.

To me, the conclusion is clear: Federal regulations require 9 hours of work per week for a 3-credit course, and there is no reason to restrict how many of those hours are spent in a classroom, a laboratory, a studio, the library, or online.