

Working Group on Integration of Multi-Campus Universities

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Introduction and Summary of Process

The Executive Committee of the Urbana-Champaign Faculty Senate commissioned our group to identify different models of governance for public universities that have multiple campuses under a single university system. This assignment was made in light of President Hogan's ideas for, and potential Board of Trustees consideration of, centralizing some structures and functions of the Chicago, Springfield, and Urbana campuses.

The Working Group identified six university systems to explore different institutional arrangements. These are listed below.

- University of Illinois
- The Ohio State University
 - Indiana University
- Pennsylvania State University
 - University of Texas
 - University of Maryland

The University of Illinois was selected as the baseline case, given the group's focus on current arrangements there and the possibility of change. The group also selected three other institutions within the CIC (Ohio State, Penn State, and Indiana respectively), peer institutions of comparable academic quality; two of these (Indiana, Ohio State) were specifically referenced in a media interview by President Hogan as, in his view, structured similarly to Illinois. In addition, the group selected two other systems with peer institutions (Texas, Maryland) that offer potentially innovative arrangements and that were among those singled out for additional scrutiny by the Rich Report (see below). Beyond these university systems, the Working Group also considered specific arrangements in certain other systems, as appropriate to the dimensions analyzed below, noted in the Rich Report, or reflecting individual knowledge of the group members. Consideration was also given to insights offered by those interviewed by the group (see below).

For each of the university systems above, a designated member of the working group gathered basic information according to a template of questions (these are given in Appendix I). Information was obtained primarily from publicly available sources, notably web-based information and public documents. This was supplemented by informal interviews with selected faculty and administrators at the university systems under scrutiny.

The group was also informed by several preexisting reports. As Interim President, Stanley Ikenberry directed Robert Rich, Director of IGPA, to examine the organizational structure of university systems in other states. His 2010 report "Review of Organizational Structures in Higher Education" (hereafter the "Rich Report") analyzed the administrative structures of 51 public university systems based on organizational charts and how senior administrative positions were arrayed in such charts. Rich graciously made the report and associated data and materials available to the working group, and he was also interviewed by a member of the working group. In addition, Associate Provost for Enrollment Management Keith

Marshall graciously supplied his report “Admissions at the Top 15 Public Universities” (hereafter the “Marshall Report”) on admissions and recruiting practices of select peer institutions. Finally, the 2010 report of the Administrative Review and Restructuring Working Group (hereafter the “ARR Report”) assessed the organizational structure and delivery of administrative services at the University of Illinois and recommended a set of reforms and changes to improve performance as well as reduce costs.

The charge to the working group was focused more on informational tasks rather than evaluative ones. Indeed, a full evaluation of various system arrangements would require extensive study by educational researchers, and is certainly beyond the scope of what the group could accomplish in less than six weeks. Nevertheless, the Working Group explored some initial steps toward understanding and assessing how multi-campus university systems are organized. We report, without our own comments or opinions, any consensus on matters from either of two sources. First, one member of the group reviewed the relevant literature in higher education administration, governance, and related fields, with an eye toward uncovering what systematic findings bear on the issues addressed here. Second, the working group interviewed a series of distinguished individuals who have held senior administrative positions at major universities, including the University of Illinois (the interview protocol and questions are given in Appendix II). The purpose of the interviews was to gain insights, based on direct experience, of effective organizational practices and general guidelines for university organization. The following individuals were interviewed (with a representative administrative position for each):¹

- Larry Faulkner (President Emeritus, University of Texas-Austin)
- Robert Berdahl (President, American Association of Universities; Chancellor Emeritus, University of California-Berkeley)
 - Stanley O. Ikenberry (President Emeritus, University of Illinois)
 - Terry Sullivan (President, University of Virginia)
- Jesse Delia (Provost Emeritus, University of Illinois at Urbana-Champaign)

Contextual and Conceptual Distinctions

In understanding the findings below and interpreting their application to the University of Illinois, there are two vital distinctions that must be kept in mind. First, the education literature makes a distinction between “multi-campus” and “multi-site” or branch campus systems. The former is characterized by campuses that have distinct missions and goals and which function largely in an independent fashion. In contrast, multi-site systems differ in terms of centrality of leadership, geographic distribution, independence and equality of institutional heads, and faculty governance bodies; these are essentially single universities that operate in multiple locations. These are best understood as ideal types, as some systems exhibit characteristics of both models. Nevertheless, Illinois is often cited as an example of a multi-campus system, whereas Ohio State and Penn State respectively are close to the multi-site model. The University of Illinois system evolved over time to its present configuration. Nevertheless, there has never been the expectation that the Chicago or Springfield campuses would feed students to or otherwise

¹ The Working Group wanted to interview several other individuals, but arrangements could not be made prior to the deadline for completion of this report.

depend on the Urbana campus for any academic functions. In contrast, in several other university systems studied (Ohio State, Penn State, and to a lesser extent Indiana), smaller campuses were created as conduits to serve the main campus, with many students transferring after a year or two of coursework. These states often lack a comprehensive community college system, and thus branch campuses in Indiana and Pennsylvania, for example, perform many functions that are carried out by Illinois' community colleges. The term "main campus" is used deliberately in these systems, but it has *never* been used in association with the University of Illinois system. This is not to pass judgment, but rather to clarify the nuanced relationships among institutions within different higher education systems. Structure is linked to mission in subtle, yet critically important, ways.

Several features of the University of Illinois follow from the distinction above and other factors, and ultimately bear on issues of consolidation and centralization as well as the applicability of any lessons drawn from the experiences of other universities. First, the University of Illinois system consists of only three campuses and covers only a small portion of state institutions of higher education, whereas those under detailed study range from 6-22 campuses and generally encompass a greater percentage of colleges and universities in their states. Second, the ratios (largest campus to smallest) for undergraduate and graduate enrollment respectively are smaller (in some cases much smaller) in the Illinois system compared to the other five institutions. Third, and in a related fashion, the range of missions is also narrower for the Illinois campuses than in other systems. Most notably, most other university systems do not have more than one research-oriented campus; typically, the systems are composed of one so-called "flagship" institution and several smaller campuses that primarily support undergraduate teaching missions. Put another way, other states do not have universities that have institutions that share as many similarities as do the Urbana and Chicago campuses.

A second distinction is between the different functions of a university system. These can be distinguished by *core or academic* functions on one hand and *administrative and business* functions on the other; the common nomenclature in the education literature is "academic core" and "administrative shell" respectively. The former are typically associated with the missions of research, teaching, and service; a wide range of functions generally fall into this category (e.g., faculty recruitment and research, tenure decisions, and course planning and delivery). In contrast, administrative functions encompass a different set of services, frequently characterized in terms of business and management (e.g., business services, procurement, government relations, and legal services). This distinction proved to be central in virtually all the information gathered by the working group, including centralization patterns, consolidation efforts, interviews, and analyses in the academic literature. Much of the discussion below is framed in terms of such a division. Nevertheless, the distinctions between academic and administrative areas are not always clear,² and that changes intended as only administrative can impact the academic core. Although we encountered some anecdotal examples of unintended impacts on academic aspects, a full analysis of this kind of interaction is beyond the scope of this report.

² Note, for example that "human resources" in a university involves hiring civil service personnel, faculty, and academic professionals, the latter of which might fall on either side (or in some cases both sides) of the administrative/academic divide depending on responsibilities.

Senior Administrative Overview

As evidenced in the Rich Report and in our own more targeted review, there are a wide range of administrative structures and duties in public university systems, in part reflecting the multi-campus versus multi-site distinction noted above. Furthermore, one cannot infer position in the hierarchy or responsibilities based on title alone, as these vary tremendously across systems.

All six systems had one individual at the top of the administrative hierarchy, but this individual's role in the system varied, as did the administrative arrangement beyond her/him and its relationship to campus heads. The presidents of the Indiana and Penn State systems also serve as head of the main or flagship campus of the system; the Rich Report notes that such an arrangement was evident in a third of public universities studied (17 of 51), but was not common in systems with comprehensive research universities. The other four universities examined, under various titles, had an individual designated as chief executive officer for the system without a role specific to a given campus.

Below the position of system head, university systems generally have some type of Vice-President or equivalent position in the area of academic affairs (Indiana is an exception). Yet the roles and responsibilities of the positions vary greatly. For example, the Executive Vice-President and Provost is the chief academic officer for the Penn State system, a line position, whereas the Vice-President for Academic Affairs in Illinois has historically been a staff position. Consistent with the broader set of institutions in the Rich Report, the six universities studied have senior positions (e.g., Executive Vice-Presidents, Vice-Chancellors, Associate Vice-Presidents) charged with responsibilities on the administrative and business (as opposed to the academic) side of the system; although under different labels, these can be classified as falling under the issue areas of health, business/finance, investment and property, human resources, legal services, and external relations. Fundraising and foundation arrangements varied. Multi-site universities, such as Ohio State, have structures for additional functions, some of which involve academic elements such as research. Finally, some systems have additional system level structures associated with particular priorities, such as environmental sustainability and minority affairs, although these are not necessarily near the top of any organizational chart. It is not always clear whether all these positions can be best characterized as "line" or "staff" positions in the systems examined.

There is similar diversity at campus levels and in campuses' relationships to the university systems. As noted above, two system presidents (Penn State, Indiana) also head the flagship campuses of their systems. In those two instances (and nationally according to the Rich Report), the system also has someone who serves as the chief academic officer for the flagship campus. Indiana has different titles and reporting lines, depending on the designation of the campus; the Indianapolis and Bloomington campus heads report directly to the system president, whereas regional campus executives report to a system vice-president in charge of regional affairs, planning, and policy. Similarly, Penn State campus chancellors report to the Vice President for Commonwealth Campuses, who in turn reports to the Executive Vice-President and Provost at the system level. Illinois has vice-president/chancellor and provost positions for each

of its campuses, and the Rich Report finds no instances in which these positions are combined into what has been called a “super-provost” position. Maryland and Texas have presidents for each of their campuses who report directly to either the system head or the vice-president of the system in charge of academic affairs. Leaders in Ohio State University’s system vary substantially, as campuses are led by individuals with various titles -- President, Executive Vice-President, or Dean -- some of whom also hold OSU system level positions because the individual campuses have different missions and relationships to the main campus.

Even given time and resources, it would be difficult to determine which system is “best,” given the heterogeneity of the different systems along a wide variety of dimensions. Interviews indicated that several factors affected system operations across different types: clarity of roles and lines of authority, communication across different levels, and the personalities of those occupying leadership positions. Generalizations are more evident in considering how university functions are centralized (or not), as described in the next section.

Centralization and Decentralization of Different Functions

As might be evident from the organizational configurations described above, centralization across campuses is found most frequently in administrative and business functions (such as procurement, payroll, investments, benefits, and union contracts). Similarly, there is also consistent practice that external relations with state and federal legislators, boards of trustees and regents also benefit from a single coordinated message; therefore, these functions are often consolidated at the system level. Indeed, the seven areas identified by the ARR report for cost savings reflect these and similar functional areas, and these functions are also mentioned frequently in the literature as part of the administrative shell. In fact, interviewees cited reducing the size of the bureaucracy at the system level in California (by some 20-50%) as an important accomplishment. Thus, consolidation does not necessarily produce an increase in the size of the university administration. The purposeful diminishing of the size of bureaucracy has been a trend in higher education for at least the past decade, according to a series of reports issued by the Kellogg Commission on the future of state and land grant universities.

In contrast, there is almost complete consensus that academic or core functions do not benefit from centralization across a multi-campus system, particularly when there is diversity across campuses with regard to academic mission and scope. Support and regulatory oversight for faculty and student research are also most commonly provided at the campus level, with relatively little centralization of research activities at the system level (see discussion below of research administration). Several administrators noted in their interviews that the closer you get to the laboratory or classroom, the better that decentralization works and the more likely that high quality research and instruction will result, including attracting external funding for those activities. Indicative of one approach to decentralization is the pending proposal to decouple the Madison campus from the rest of the University of Wisconsin system, based on the former’s research orientation and goal of greater self-reliance.

Few consolidation efforts with respect to academic functions were evident in other systems because of the desirability of campus autonomy noted above or state political

constraints. Some efforts at streamlining course descriptions across campuses have been made at Penn State to facilitate transfer credit (as branch campuses in the Penn State system have a central role in transferring students to the main campus). Maryland has promoted some joint programs, but has not consolidated programs across campuses. Indiana is conducting a broad review of its academic programs, including possible mergers, discontinuing programs and units, and creating new programs and units in selected areas, especially those that are multidisciplinary.³ As is evident from all these efforts, consolidation does not necessarily equate with greater centralization at the system level.

As might be expected, the areas in which the least consensus exists are those that lie at the boundary of administrative and academic concerns. Most reflective of this is research administration. The coordination of research-related discussions with federal and state agencies and foundations sometimes occurs at the system level, but can equally well be situated at the campus level. The Vice Presidents for Research (VPR) at Indiana, Ohio State, and Penn State are responsible for research development, research compliance, and research administration for the system. They work system-wide with faculty, campus leaders, and deans. These Vice Presidents work to increase and diversify research and creative works, attract external funding for these activities, and develop public-private partnerships, technology transfer, graduate education, and inter-campus research opportunities. The Vice Presidents for Research at Maryland and Texas are responsible for their campuses only. The Vice President for Research at Illinois (a new position with responsibilities not yet clearly defined) is purported to have a coordinating role for large research initiatives, as well as responsibility to increase and diversify research and creative works, attract external funding for these activities, and develop public-private partnerships, technology transfer, graduate education, and inter-campus research opportunities.

The roles of the VPRs in setting the research agenda is difficult to ascertain. Any gatekeeping in terms of assessing multiple proposals from faculty at different campuses seemed to be applicable only for limited submission competitions. Nevertheless, such “competition between campuses” is unlikely when the system is composed of divergent institutions and only one major research campus. Practice varied somewhat in the degree of centralization of grant and contract services. Ohio State and Indiana had central grant offices, but this usually meant that the processing and administration of grants were done in one location. Other systems, including Illinois, do not centralize such services. Whether overhead rates were the same for each campus or variable was split among the six systems. The Working Group could not easily determine how much ICR was allocated to the system level versus the campus level under these different configurations.

Another area in which no clear pattern emerged pertains to marketing, media relations, and “branding.” Some institutions see a benefit from centralizing these functions (e.g., common website configuration and university colors), whereas others focus their efforts around individual units (usually the flagship institution) within the system. The third area in which little consensus can be found pertains to fundraising, alumni relations, and advancement. Some institutions coordinate these efforts across multiple campuses while others do so to a much lesser degree.

³ The report of Indiana’s New Academic Directions Committee was not available as of this writing.

The clear consensus in the interviews and the education literature is for consolidation and centralization in the administrative sector and for decentralization and autonomy at the campus in academic matters; national trends are consistent with these recommendations according to the Kellogg Commission. All those interviewed favored centralization of “business” functions as a way to improve efficiency and to secure cost savings. Yet they were equally adamant that the core missions of the campuses be left in the hands of campus leaders and the faculty. Several cited the University of California system as a model, in which significant autonomy is granted to individual campuses even as they are integrated into a three-tiered system structure. One interviewee noted that a university campus is not equivalent to a corporate division, and that the unit of value is in the campus, not the system itself. Another respondent indicated that the experiences of the most important stakeholders generate loyalty to where they work, teach, study, and donate: faculty are hired and hold tenure on one campus and are immersed in the mission and value system of one campus; students in most universities study and graduate from one campus; alumni are tied to the campus that they attended; and donors are connected to specific campuses and particular programs.

Similarly, the education literature tends to favor decentralization in general and portrays the University of Illinois as a preferred model of leadership for the multi-campus system. This is one characterized as having a president that serves at the system level and performs a number of administrative functions, especially maintaining relationships with the board of trustees, government leaders and other external constituents, whereas campus level executive leadership has primary responsibility for administration of each institution. Nevertheless, several of the interviewees noted that the Illinois system has not always served the best interests of the Urbana campus, although it was not always clear whether the respondents thought the problems were structural, those related to leadership, or some combination thereof.

Some studies note the potential for system leaders to enhance higher education, and these thereby suggest the kinds of value-added that are best contributed at the highest levels (and, by implication, that are not): synergy (enhancing institutional performance through coordination), strategy (fulfilling individual missions while contributing to common purposes), efficiency (reducing redundancy in business functions and reallocating administrative resources), accountability (meeting the needs of the state and other constituencies), and integrity (resisting intrusions from outside groups in educational affairs). In contrast, higher education researchers caution against centralization of functions that run counter to collaboration and innovation. Centralized structures can diminish opportunities for collaborative work and dampen personal commitment to partnerships within and between campuses, and they can threaten appropriate levels of transparency and disclosure of necessary administrative processes. Scholars urge senior executives to model collaborative leadership and reject top-down plans in favor of developing networks to open up communication and make the core work of higher education more transparent and better understood by its many constituents.

Enrollment Management

Each of the six systems studied includes at least one campus identified as a major research university whose graduating seniors will be competitive applicants in the job market

and for admission to graduate programs at first-tier universities. This imposes practical, and obvious, constraints on admissions and intra-system transfer policies; students are not well served by admission into programs that are too difficult, or for which they are insufficiently prepared. Centralization patterns in enrollment management are reflective of the academic/administrative and multi-campus/multi-site distinctions.

Admissions

Reflecting the difference in admissions standards across their constituent campuses, all six systems have separate admissions standards for first-time students. Typically, admissions are more competitive at the leading research university than at the smaller campuses. This practice is consistent with the finding of the "Marshall Report," which found that: "There was consensus among those surveyed [at the U.S. News and World Report top 15 public universities] that admissions is viewed as a core academic function on their campus and that admissions, particularly recruiting, must be tied to the unique curricular and co-curricular opportunities that define each campus."

Two of the systems —Ohio State and Penn State—use a common application for freshman admission, reflective of the multi-site system model. In these applications, the prospective student indicates the target campus or campuses. Campuses in the other four systems use separate application processes. Of course, many of these systems and campuses allow the "Common Application" that allows students to provide basic application information to hundreds of schools across the country with one form. According to the Marshall Report, the University of California hires the Educational Testing Services (a private vendor) to verify certain aspects of all applications, and calculate high school ranks, and to conduct a yearly verification of selected applicant information. Each of the 10 campuses, however, processes the majority of the applicant information, even if the student has applied to multiple campuses.

Joint or recruiting efforts across campuses are rare and extremely limited in our sample of universities and in the broader set of institutions examined in the Marshall Report. Some geographic restrictions in recruiting are reflected in the Penn State system.

Concurrent Enrollment in Courses away from the Student's Home Campus

The policies for enrollment in courses taught away from the student's home campus vary from system to system. Not surprisingly, Ohio State's policy is the most liberal, permitting enrollment across campuses. Other state systems allow the practice, but often with restrictions or conditions: Maryland (only for courses not offered at the home institution), Texas and Penn State (only for the summer term), and Indiana (student must enroll for a semester as a "non-degree student" at the non-degree campus). Illinois does not privilege students from within the system, but does have special agreements with Parkland College that reflect fairly recent developments tied to a grant with the Lumina Foundation for Education. The shortest distance between any two of Illinois' campuses is greater than the other systems studied, making simultaneous enrollment in classes on multiple campuses less practical than in some other state systems. Nevertheless, concurrent enrollment policies reflect traditional classes requiring the physical presence of students, and are likely to be subject to change as online course availability, and accompanying student demand for it, proliferates.

Inter-Campus Transfer Policies

System transfer policies tend to take into account the institution-to-institution variation in academic rigor of programs across the system's campuses as well as how well integrated the system is designed to be. Maryland guarantees state residents transfer admission to a system campus as long as the student meets the institution's minimum standards *and* there is room in the target institution for the transfer student. Texas has a "conditional acceptance" program intended to facilitate intra-system transfer. Applicants are required to have completed at least 30 credit hours at the time they transfer to the new institution; admission is competitive given enrollment pressures in certain programs of study. For transfer to the main Columbus campus, Ohio State includes unit-to-unit differences in requirements. These are probably similar to the different minimum GPA requirements that Urbana campus imposes for transfer into its various Engineering departments. Students in Indiana must go through a formal application process, with three of the largest campuses exercising greater control (with separate application forms) than the smaller campuses that employ a common application.

Penn State is unique in our sample: students are assigned to a campus during the admissions process with the understanding that after declaring a major, a student may need or desire to request a "change of campus" in order to complete their degree. Each of the campuses offers basic courses appropriate for entering undergraduates. The specifically designed "2X2" program is predicated on a large number of students transferring to other campuses in their third year.

Course articulation procedures and policies exist at all the institutions to handle transfer students from within and outside the system. The Illinois Articulation Initiative (IAI) has been in place for well over a decade, and this system includes all of the institutions in the University of Illinois system as well as over 100 colleges and universities in Illinois. This system facilitates transfer of students throughout the state, which is important to maximizing student transfer statewide. Compared to Ohio and Pennsylvania, Illinois' system of transfer is considered by higher education scholars as a more robust system. Because of its system, Penn State has undertaken greater coordination in assuring that basic classes are uniform and available across campuses. Yet, evident in the discussions with administrators from the other five universities, articulation procedures do not necessarily solve problems arising from differential grading and skill level standards employed in purportedly comparable courses.

Identification of the Constituent Campus on Diplomas

Ohio State-Lima and Ohio State-Columbus graduates receive the same diplomas, even though Lima has an open admissions policy—"any Ohio resident who has graduated from high school (or earned a GED) and not attended any other post-secondary school... will be admitted" while Columbus "has a competitive admission process in which students are considered for admission based largely on their academic performance and credentials." Penn State awards system-wide diplomas, but those might include a specific college name that is located on a particular campus (e.g., Behrend College and the Erie campus). The other four systems award diplomas that are institution-specific.

Appendix I: Template of Questions

1. Descriptive Overview
 - How many campuses are covered under the university umbrella?
 - What are the graduate and undergraduate enrollments of the individual campuses?
 - Do those campuses explicitly or implicitly have different missions?
 - Any distinctive features (e.g., medical schools) of those campuses?
2. Senior Administrative Structure
 - What is the array of senior administrative officers (President, Chancellors, Provost, Vice-President, etc.)?
 - What are the duties (broadly) associated with each other and how to they relate to each other and to individual campus governance?
 - When central administration structures exist (e.g., what we call UA or University Administration)?
3. Centralization and Decentralization of Administrative Functions
 - Which (if any) administrative functions are centralized across campuses?
 - How are governmental relations handled – centrally or individually according to campus?
 - How are issues of “branding” and public image managed – “one” institution, by individual campus, or some hybrid?
4. Academic Integration
 - Is there is a single diploma or do diplomas distinguish by campus?
 - Is there a single application and admission process or is this distinguished by campus?
 - What is the policy for students taking courses across campuses?
 - What is the policy for students transferring across campuses?
 - Has there been any consolidation (e.g., elimination of “duplication”) of colleges, departments, or programs across campuses?
5. Faculty Research
 - Are grants and contracts offices and processes centralized?
 - Does the central administration perform any gatekeeping function or otherwise restrict competing grant proposals across campuses?
 - Does the central administration accrue ICR or other overhead for grant or contract administration?
 - Are overhead costs billed the same across the university or does it vary by campus?

Appendix II: Interview Protocol and Questions

We are part of a working group appointed by the UI Senate Executive Committee to identify different models of governance for state universities that have multiple campuses under a single university system. This assignment was made in light of President Hogan's vision of "one university" and potential Board of Trustees' consideration of consolidating some administrative structures and functions of the Chicago, Springfield, and Urbana campuses.

As part of the information gathering exercise, the working group is interviewing select individuals who have familiarity with the Illinois system and higher education generally. Obviously, as XXXXXX, we think that your insights can help us prepare a report that will inform the Senate, the President, and the Board on future changes in the structure of the University of Illinois.

We would like to ask you a series of brief questions. We expect that most of your responses will be used by committee members only, and no quote or information would be attributed directly to you in any report, except with your permission. Indeed, we will share our notes with you and ask you to sign off on their accuracy. Your name will be listed in the report as one of the individuals interviewed.

1. How much does structure intersect with leadership? Are there some structures that enhance the best leaders (or exacerbate the worse tendencies of bad leaders)?
2. In your experience, are there university functions that, if centralized or consolidated, generally improve institutional excellence in core missions? We are interested in administrative, business, and academic functions.
3. In your experience, are there functions that, if centralized or consolidated generally detract from core excellence?
4. Are there effective structures to maximize educational quality and research productivity across multiple campuses in a single system when those campuses serve different constituencies in different ways in different parts of the state?
5. Are there organizational structures that improve outcomes with legislative support?
6. If financial constraints call for serious cutbacks/reductions in programs/offerings, what organizational structure is likely, in your view, to lead to the strongest decisions, using future viability, excellence and serving designated constituencies, as the metrics of success?
7. Are there other state universities that you believe are good (or bad) models to dealing with this situation? Why?

8. Are there any other thoughts you would like to share about the “one university across multiple campuses” dynamic, including those specific to Illinois?