



# Unnecessary Duplication Policy

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# Unnecessary Duplication

KRS 164.020(16) authorizes the Council to eliminate, in its discretion, existing programs or make any changes in existing academic programs at the state's postsecondary educational institutions. Unnecessary duplication is one criterion outlined in the statute.

The Council has operationalized the concept of unnecessary duplication with a two-phase process for universities. Because the mission of community and technical colleges are to meet local needs and because community college students are typically place-bound, associate degree program proposals are not subject to the Unnecessary Duplication review.

## Phase 1

As part of the new program approval process, universities are required to submit a Notification of Intent (NOI). Upon receipt of that NOI, Council staff will begin the process of determining if the additional program would be considered an unnecessary duplication.

If there are three or more existing programs, Council staff will then conduct the following analyses on the existing programs to determine if any have:

- low and declining enrollment (40 or fewer students) and has been trending downward for three years);
- low student demand (Gray 40<sup>th</sup> percentile or lower), and
- low market demand (Gray 40<sup>th</sup> percentile or lower).

These are the programs that are more likely to be impacted negatively by the addition of another program within the state.

If no existing program meets these criteria, then the anticipated program described in the NOI will not be considered unnecessarily duplicative and can proceed with the program approval process. If one or more programs meet these criteria, additional analyses will be conducted in Phase II.

## Phase II

Council staff will request additional information from universities to determine the potential for unnecessary duplication. This information will include:

- Analysis of proposed curriculum and the curricula of similar programs using a CPE template.
- Documentation that the student population of the proposed NOI differs substantially from the student population of the existing programs.
- Evidence that the proposed program aligns with the university's approved mission.
- Faculty capacity.
- (If applicable) Evidence that the necessary clinical sites/spaces are available, and that the addition of a new program would not impact clinical sites/spaces for existing programs.

The following rubric will be used in this second phase of analysis, and Council staff will work with the university to obtain the information needed for the analysis. If analysis in this second phase determines that the program would be unnecessarily duplicative, the NOI will not be approved and the program will not progress to the program proposal stage.

Criteria	Example 1	Example 2	Example 3	Example 4	Example 5
Does the proposed program's curriculum overlap with existing curricula (i.e. 50 percent or more of courses are similar)?	Yes	Yes	Yes	Yes	Yes
Is the target student audience different (other than being in the proposing university's area of geographic responsibility)?	No	Yes	Yes	Yes	Yes
Is there evidence of sufficient market demand for a new program (i.e. Gray DI workforce demand is in 80 <sup>th</sup> percentile or higher)?	Yes	No	Yes	Yes	Yes
Is there evidence of sufficient student demand for a new program (i.e. Gray DI student demand is in 80 <sup>th</sup> percentile or higher)?	Yes	No	Yes	Yes	Yes
Does the proposed program fit within university's approved mission?	Yes	Yes	No	Yes	Yes



Does the proposing university have capacity to offer the program without hiring new faculty?	Yes	Yes	Yes	No	Yes
Has the proposing university identified needed clinical sites with corresponding clinical spaces?	Yes	Yes	Yes	No	Yes
<b>Determination</b>	<b>Unnecessary Duplication</b>	<b>Unnecessary Duplication</b>	<b>Unnecessary Duplication</b>	<b>Unnecessary Duplication</b>	<b>Justifiable Duplication</b>