

Concerned Stakeholder  
D'Youville College  
320 Porter Avenue  
Buffalo, New York 14201

MaryEllen Elia  
New York State Commissioner of Education  
New York State Education Building  
89 Washington Avenue  
Albany, NY 12234

Dear Commissioner Elia:

This letter is intended to urge your consideration and approval for D'Youville College's (D'Youville) University designation (application submitted on November 2, 2018 at 5:02PM). As detailed within, our institution clearly meets all the Board of Regents criteria defining the term "University." However, to the best of our knowledge, D'Youville's application has not been forwarded to the New York State Board of Regents for review and approval.

As trustees, administrators, faculty, staff, students, alumni and friends, we are concerned that D'Youville's pending application is unnecessarily causing a serious competitive disadvantage that will result in negative financial consequences to an otherwise healthy educational institution. By obstructing D'Youville from the ability to claim university status, you are destabilizing the long-term viability of a very critical employer in the City of Buffalo and New York State region.

**Defining a "University":**

New York State Education Law §224(1) prohibits an entity from conducting business utilizing the "university" terminology unless the Board of Regents has given it permission to do so. The Board approved definition of a "university" is:

*a higher education 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 [§50.1].*

That is to say, university status is designated based upon the following three criteria:

1. offering registered undergraduate and graduate curricula in the liberal arts and sciences,
2. offering degrees in at least two (2) professional fields, and
3. offering doctoral programs in at least three (3) academic fields.

To evaluate these criteria, one must further define the terms "professional field" and "academic field." Our understanding of a *professional field* is any of the listed New York State licensed professions provided on the NYSED website ([www.op.nysed.gov/prof/](http://www.op.nysed.gov/prof/)). Leslie Templeman and John D'Agati have proposed to us that an *academic field* is any program which is recognized by New York State's taxonomy of education programs and classified with a Higher Education General Information System (HEGIS) Code.

**D'Youville's Point-to-Point Response to the University Designation Criteria:**

The following sections provide a concise point-to-point response describing how D'Youville currently meets the required criteria to be recognized as a university.

1. *Offering registered undergraduate and graduate curricula in the liberal arts and sciences.*  
D'Youville offers at least twenty (20) registered undergraduate and graduate curricula in the liberal arts and sciences. Some representative examples of these programs are:

Registered Undergrad Programs	HEGIS Code	Registered Graduate Programs	HEGIS Code
Accounting, BS	0502.00	Anatomy, MS	0412.00
Biology, BA or BS	0401.00	Accounting/Int. Business, MS	0513.00
Business Management, BS	0506.00	Business Administration, MBA	0506.00
Chemistry, BS	1905.00	Curriculum and Instruction, MS	0829.00
English, BA	1501.00	Health Services Admin., MS	1202.00
History, BA	2205.00	International Business, MS	0513.00
Information Technology, BS	0702.00	Public Health, MPH	1214.00
International Business, BS	0513.00		
Mathematics, BA or BS	1701.00		
Philosophy, BA	1509.00		
Psychology, BA	2001.00		
Religious Studies, BA	1510.00		
Sociology, BA	2208.00		
Spanish, BA	1105.00		

2. Offering degrees in at least two (2) professional fields.

D'Youville offers degrees in at least seven (7) professional fields. Some representative examples of these degrees and their corresponding professional fields include:

Degree name	Professional Field	HEGIS code
Family Nurse Practitioner, MS/DNP Psychiatric/Mental Health NP, MS/DNP	Nursing	1203.10
Occupational Therapy, MS	Occupational Therapy	1208.00
Pharmacy, PHARM D	Pharmacy	1211.00
Physical Therapy, BS/MS/MPT/DPT	Physical Therapy	1212.00
Chiropractic, DC	Chiropractic	1221.00
Physician Assistant, BS/MS	Medicine	1299.10
Dietetics, BS/MS	Dietetics-Nutrition	1306.00

3. Offering doctoral programs in at least three (3) academic fields.

D'Youville offers doctoral programs in three (3) academic fields. These doctoral programs and their corresponding academic fields are as follows:

Doctoral Program	Academic Field	HEGIS Code
Health Professions Education, EdD	Health Professions, Other	1299.00
Health Administration, EdD	Hospital and Healthcare Admin.	1202.00
Educational Leadership, EdD	Educational Administration	0827.00

**Note:** D'Youville's Health Administration, EdD program is currently miscoded as 1299.00 (Health Professions, Other), instead of 1202.00 (Hospital and Healthcare Administration). Our Health Administration, EdD is the terminal degree of the Health Services Administration, MS, which is currently properly coded as 1202.00. A request for correcting the HEGIS code of our Health Administration, EdD program was submitted during the first week of March 2019.

**Summary:**

To reiterate, D'Youville currently: (1) offers a wide range of registered undergraduate and graduate curricula in the liberal arts and sciences, (2) offers degrees in at least seven professional fields, and (3) offers doctoral programs in three academic fields.

In New York State, institutions are scrutinized and upheld to much higher standards than other states require to attain University status. Despite these stricter standards, D'Youville satisfactorily meets the specified criteria. However, the status of our request remains pending without review by the Board of Regents. We respectfully request that you review and subsequently advance to the Board of Regents for approval, D'Youville College's application for a name change to D'Youville University.

Sincerely,                      Print Name: \_\_\_\_\_ Sign Name: \_\_\_\_\_

Stakeholder of D'Youville College

- Student                       Faculty                       Staff  
 Administrator               Trustee                       Alumni  
 Other

- Cc. Regent Catherine F. Collins, Board of Regents  
Cc. Mayor Byron W. Brown, City of Buffalo  
Cc. Senator Tim Kennedy, New York State Senate  
Cc. Majority Leader Crystal Peoples-Stokes, New York State Assembly