



# UNIVERSITY OF TEXAS AT AUSTIN

## AGE DISCRIMINATION ACT COMPLIANCE REPORT



**Department of Aerospace Engineering and  
Engineering Mechanics**

**Office of Diversity and Equal Opportunity  
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## INTRODUCTION

### A. Background

As a federal grant-awarding agency, it is NASA's duty to evaluate grant recipient compliance with the Age Discrimination Act of 1975<sup>1</sup> (the Age Act or the Act). This compliance review of the University of Texas at Austin (UTA or the University) Aerospace Engineering and Engineering Mechanics Department (AEEM or the program), a NASA grant program recipient, was conducted by NASA under the authority of the Age Act and its companion NASA regulations.<sup>2</sup> This review focused on ensuring that UTA is complying with the law and the NASA regulations; fully understands the Age Act and its corresponding legal obligations; and is implementing policies and procedures appropriate to achieving equality of access for all students, regardless of age.

### B. Scope

NASA's Age Act regulations provide tools for effective oversight and monitoring of the Act's requirements. Each recipient is required to sign a written assurance that it will comply with the regulations and avoid discrimination based on age. (*See*, 14 C.F.R. § 1252.302(a)) The University, as a recipient of NASA grants, has signed the required assurances.

In addition, NASA may require recipients to provide, upon request, information and reports, including self-evaluative information, which NASA determines necessary to ascertain whether the recipient is complying with the Act and its regulations. (*See*, 14 C.F.R. §1252.302(b) and §1252.303) Under this provision, NASA limited the scope of its review to the University's, and AEEM's, methods of administration regarding three substantive measures of compliance:

1. Formal Indicators of Institutional Support for Compliance: NASA sought to confirm the presence of institutional policies and procedures demonstrating knowledge of and commitment to the requirements of the Age Act, and the ability to identify and remediate violations.

2. Admissions Policies, Outreach Efforts, and Retention: NASA conducted an analysis of admissions policies and criteria and institutional outreach efforts that serve the purpose of eliminating or limiting any potential barriers to entry, and may also seek to attract, nontraditional students, including nontraditionally aged students. For purposes of this review, NASA defined "nontraditionally aged" students as undergraduates over the age of 25 when first enrolled as freshmen, and graduate students age 30 or older when starting their graduate program.<sup>3</sup>

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<sup>1</sup> *See*, 42 U.S.C. §§ 6101 to 6107.

<sup>2</sup> 14 C.F.R. Part 1252.

<sup>3</sup> The National Center for Education Statistics (NCES) acknowledges there is no precise definition for the term "non-traditional student," but suggests that part-time status and age are common elements in most definitions. Generally "traditionally" aged undergraduates are between the ages of 18 to 24. NCES used this as

3. Access to Programs and Facilities: NASA examined UTA's and AEEM's programs and facilities efforts to ensure equality of access to educational offerings and benefits, including the academic and other support services necessary to achieving a degree.

### C. Methodology

This compliance review was carried out in phases. The first phase consisted of a preliminary "desk-audit" review, in which UTA submitted documents in support of its response to a Self-Evaluation Tool (also referred to as "UTA's Self-Evaluation Tool" or "UTA's Attachments") developed by NASA based on its three measures of substantive compliance. UTA's Self-Evaluation Tool served as the primary basis for the preliminary evaluation of the school's efforts towards compliance with the Age Act.<sup>4</sup> During the second phase of the review, NASA submitted to UTA and AEEM an Information Request, which sought documents and other materials from the subject institutions, reflecting policies and procedures concerning anti-discrimination laws, identification and allocation of resources, including, but not limited to, staff, and training; outreach, recruitment, admissions, and enrollment; course offerings, mentoring, and faculty advisors; student services; and family-friendly policies. UTA's response to this request included a narrative response ("UTA's Response to Information Request" or "UTA's Binder"). The final phase of NASA's review was an onsite assessment of the program which took place on April 5-8, 2010. During the onsite review, the team conducted interviews with officials charged with anti-discrimination compliance, as well as with AEEM faculty, staff and students. Students interviewed included both traditionally and non-traditionally aged learners.

## NASA AGE DISCRIMINATION ACT REGULATORY REQUIREMENTS

### A. Rules Prohibiting Age Discrimination

The Age Act and NASA regulations prohibit discrimination based on age in any program or activity receiving Federal financial assistance. Prohibited discriminatory acts include, but are not limited to, excluding individuals from, denying them the benefits of, or subjecting them to discrimination in, any program or activity of the recipient. In addition, recipients of Federal financial assistance may not use age distinctions or take any other actions which have the effect of discriminating against program participants on the basis of age. (See, 14 C.F.R. §1252.200(a), (b)) Age distinctions are defined as "any action using age or an age-related term." (*Id.*, at §1252.103(d)) The term "action" is defined as

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a demarcation based on the age at which students are considered financially independent for purposes of financial aid. NCES, "[Special Analysis 2002 Nontraditional Undergraduates](http://nces.ed.gov/programs/coe/2002/analyses/nontraditional/sa01.asp#ft3)", [Institute of Education Sciences, U.S. Department of Education](http://nces.ed.gov/programs/coe/2002/analyses/nontraditional/sa01.asp#ft3). Accessed at <http://nces.ed.gov/programs/coe/2002/analyses/nontraditional/sa01.asp#ft3>. See also, "Nontraditional Students Enrich U.S. College Campuses: Older students value challenging courses with real-world applications" (April 29, 2008) (referring to "non-traditional college age students (age 25 or older)"). Accessed at: <http://www.america.gov/st/educ-english/2008/April/200804281212291CJsamohT0.3335382.html>.

<sup>4</sup> These results were summarized in NASA's Age Discrimination Act Desk-Audit Report: The University of Texas at Austin.

any “act, activity, policy, rule, standard, or *method of administration*.” (*Id.*, at § 1252.103(b), *emphasis added*) The term “age related” is defined as “a word or words which necessarily imply a particular age or range of ages (*e.g.*, “children,” “adult,” “older persons,” but not “student”). (*Id.*, at §1252.103(e))

Unlike the Age Discrimination in Employment Act (“ADEA”), which is designed to protect individuals over the age of 40, the Age Discrimination Act of 1975 does not define the protected category of beneficiary by a specific age or age range. In other words, the Age Act is designed to protect individuals of any age in programs receiving Federal financial assistance.<sup>5</sup>

## **B. Exemptions and Exceptions to the Rules Prohibiting Age Discrimination<sup>6</sup>**

There are exemptions and exceptions to the Age Act under NASA regulations. Programs exempt from coverage include those that create age distinctions “established under authority of any law,” for example, laws designed to provide benefits or assistance to persons based on age.<sup>7</sup> (14 C.F.R. §1251.102) The Age Act and NASA regulations also exclude employment and labor-management actions and activities from their coverage.<sup>8</sup> Discrimination in employment actions is covered under the Age Discrimination in Employment Act (ADEA).

Although a program or activity may fall under the scope of the regulations, it may qualify for one of two recognized exceptions. The first exception is that the activity reasonably takes into account “age” as a factor necessary to the normal operation of the achievement of any statutory objective of a program or activity. For example, an action reasonably takes into account age if age is used as a measure of approximation of one or more other characteristics or the other characteristics are impractical to measure directly on an individual basis. 14 C.F.R. § 1252.201(b).

In addition, an action that is otherwise prohibited can meet an exception if it based on factors other than age, *even though it has a disproportionate effect on a certain age group*. Nonetheless, the NASA regulations expressly state that: “[a] recipient may not, in any program or activity receiving Federal financial assistance, . . . use age distinctions or take any other actions which have the effect, on the basis of age, of: (1) Excluding individuals from, denying them the benefits of, or subjecting

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<sup>5</sup> The applicability of the Age Act to all ages is well-illustrated by a recent case involving a “child prodigy” at the University of Connecticut who was denied enrollment in a class that required field work in Africa. The student’s mother has alleged that the denial violates Federal law and the university’s antidiscrimination policy. (See, [http://chronicle.com/blogPost/13-Year-Old-Prodigy-Claims-Age/21813/?sid=pm&utm\\_source=pm&utm\\_medium=en](http://chronicle.com/blogPost/13-Year-Old-Prodigy-Claims-Age/21813/?sid=pm&utm_source=pm&utm_medium=en) ) In the Aerospace Engineering context, a parallel might be a flight time requirement to earn an aeronautics degree, in which case a 13 year old would not or could not qualify because he or she could not have a license to fly.

<sup>7</sup> Section 1251.02 uses the language: “An age distinction contained in that part of a Federal, State, or local statute or ordinance adopted by an elected body.”

<sup>8</sup> 42 U.S.C. § 6103 (c).

them to discrimination under a program or activity receiving Federal financial assistance; or (2) Denying or limiting individuals in their opportunity to participate in any program or activity receiving Federal financial assistance.” 14 C.F.R. 1252.200(b)(1)-(2).

### **INSTITUTIONAL AND RECIPIENT PROGRAM PROFILES<sup>9</sup>**

NASA examined statistics available from the U.S. Census for 2007 to better understand the U.S. population of students in higher education from an age perspective. According to U.S. Census data for 2007, of the full-time student population, 75% was under age 25, while 25% was age 25 or older. Of the part-time student population, 29% was under age 25, while 70% was age 25 or older. The U.S. Census data was not broken down into further categories, such as full-time undergraduate student and/or full-time graduate student and therefore, no similar statistics could be evaluated.

#### **A. University of Texas at Austin, Overall**

UTA has approximately 49,984 students.<sup>10</sup> Undergraduate students make up 75 percent (37,389) of the total student body. The full-time student enrollment is 45,579, while part-time enrollment is 4,405 students. The Graduate enrollment is 10,975 full-time and 1,620 part-time students.<sup>11</sup> UTA reported that less than 10% of its undergraduate, degree-seeking, students are adult learners as defined by NASA for purposes of this review.

#### **B. Aerospace Engineering and Engineering Mechanics Program**

The AEEM program is a part of UTA’s Cockrell School of Engineering (CSE), which has an undergraduate enrollment of 5,059 full-time students who have declared a major in one of CSE’s programs. AEEM’s statistics showed that, as of Fall 2009, 4% of undergraduates and 23% of graduate students are nontraditionally aged.<sup>12</sup>

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<sup>9</sup> Information was taken from UTA’s Self-Evaluation Tool, UTA’s Response to Information Request, UTA’s Attachments, UTA’s Binder, review of the University’s Web site, and to some degree from information obtained during interviews of stakeholders.

<sup>10</sup> This combines undergraduate and graduate enrollments as of May, 2009. See, UTA’s Self-Evaluation Tool, p.1.

<sup>11</sup> UTA provided a copy of its Statistical Handbook from 2005-2006, with data ranging from 2000 to 2005. Because the data in this handbook was provided only through Fall 2005, it was not used to form any conclusions herein. However, it is useful to note that from 2002 – 2005, none of the first time in college undergraduates were aged 25 or older. (See, Statistical Handbook at p.59) Looking at university enrollment as a whole, approximately 4% of all undergraduates enrolled in Fall, 2005 were age 27 or older (*age cutoff determined by university*) Approximately 28% of all graduate students enrolled in Fall, 2005 were age 30 or older. (*Id.*, at p. 20)

<sup>12</sup> See, “Fall 2009 AEEM UG.xls” and “Fall 2009 AEEM GRAD.xls.”

AEEM reported its data on currently enrolled undergraduate and graduate students as of the spring semester, 2010.<sup>13</sup> According to this data, AEEM has a total of 538 students enrolled in the undergraduate program and a total of 142 students enrolled in the graduate program. In the undergraduate AEEM program, there were a total of 22 students (or 4%) that were 25 years old or older. Of those students, 17 students were 25 years old or older at the start of their first semester. In the graduate AEEM program, there were 26 graduate students (or 23%) who were 30 years old or older. Of those students, 10 were 30 years old or older at the start of their first graduate school semester.

Of the 538 undergraduates, 38 are enrolled in less than 12 hours (which is defined as part time). Examples of reasons as to why these students are part-time include, but are not limited to, the following: about 8 are graduating seniors who don't need to take more credits, health issues, changing major, children, and taking courses at ACC (Austin Community College). Of the 142 graduate students, 9 take less than 9 hours (which is defined as part time).

## **COMPLIANCE ANALYSIS**

In the sections that follow, each of the three substantive measures of compliance that are the focal points of this review are examined. Each measure of compliance is addressed based upon information contained in UTA's Self-Evaluation Tool and UTA's Attachments, UTA's Response to Information Request and UTA's Binder, the University's Web site, and, where relevant, interviews with University officials and graduate and undergraduate students in the AEEM program.

### **A. Formal Indicators of Institutional Support for Compliance**

#### **1. Analysis**

This measure of compliance is defined by NASA as formal institutional policies, procedures and programs designed at least in part to achieve the goals of the Age Act. This includes the University's efforts to foster awareness of the law's requirements and to provide mechanisms to address concerns regarding the law, for example, internal discrimination complaints procedures, orientation or training, and notice to students as to their rights under the law.

##### *a. Official(s) Charged with Responsibility for Equal Opportunity and Age Act Compliance*

UTA reported that it has five persons whose function relates to equal opportunity and civil rights matters, although it did not report the specific functions of the staff members. The key official identified by the University as responsible for equal opportunity compliance is the Associate Vice President for Institutional Equity and Workforce Diversity and the head of the University's Equal Opportunity Services (EOS).

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<sup>13</sup> See, Linda Millstone email, re: Request for Information (Post-Onsite), dated 4/20/2010.

*b. Anti-discrimination Policies*

Materials supplied as part of UTA's Self Evaluation Tool, its Response to Request for Information, and information found on UTA's Web sites show formal policies identifying and prohibiting discrimination and otherwise mandating compliance "with civil rights laws and goals of diversity."<sup>14</sup> UTA's formal Nondiscrimination Policy and Complaints Procedure both reference "age" as among the protected bases under antidiscrimination law. However, the only specific reference to the Age Act and of the laws or legal sources that serve as the University's authority in these areas is found in an endnote at the very close of the document.<sup>15</sup>

UTA's Web site for EOS does not make any reference to the Age Act, even though it supplies a listing of similar antidiscrimination statutes.<sup>16</sup> Components of the EOS site and documents reviewed show prominent references to civil rights laws including Title VI of the Civil Rights of 1964, Title IX of the Education Amendments Act of 1972, the Americans with Disabilities Act (ADA) of 1990, and Section 504 of the Rehabilitation Act of 1973), but not the Age Act.<sup>17</sup> Further, the site indicates that UTA has assigned resources and specific personnel charged with "monitoring compliance and resolving complaints of discrimination based on race, gender and disability as provided by these statutes." In contrast, there is no such reference or indication of engagement applicable to the Age Act. Outgoing links from the EOS site, particularly those referencing "Federal Compliance," also omit references to the Age Act, while providing links to sites concerning other antidiscrimination laws.

Similarly, no such reference is made to the Age Act in the "President's Policy's Statement on Equal Opportunity/Affirmative Action Program Policy Statement," whereas other antidiscrimination laws are highlighted (although "age" is referred to as a protected classification under the policy).<sup>18</sup> UTA's

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<sup>14</sup> See 'Nondiscrimination Policy' at University of Texas Revised Handbook of Operating Procedures at <http://www.utexas.edu/policies/hoppm/04.B.01.html> and the like policy from the Registrar's Office found in UTA's Attachments III and IV, respectively.

<sup>15</sup> See, <http://www.utexas.edu/policies/hoppm/04.B.01.html>, p. 10.

<sup>16</sup> See, <http://www.texas.edu/eosabout.html> at EOS, p.2. In this regard, the University reiterates that, while the Age Discrimination Act of 1975 is not overtly mentioned on the EOS web site, it is found as a statutory source on the University's Nondiscrimination Policy and is also found in the online mandatory training and, therefore, the statute is currently a part of University's compliance initiatives. The University also informs NASA that the EOS office is changing its name to the Office of Institutional Equity. As such, it will have a new web presence which will include NASA's recommendation that greater prominence given to the Age Discrimination Act of 1975. While some changes have already been made, effective September 1, 2010, when the name of the unit changed, a complete overall will ensue. See Linda Millstone, Associate Vice President for Institutional Equity and Workforce Diversity, letter to David Chambers, Senior Civil Rights Analyst, Office of Diversity and Equal Opportunity, NASA, re: UT Austin's Response to NASA Audit, September 8, 2010 (hereafter cited as Millstone letter) (attached as Appendix A).

<sup>17</sup> See, <http://www.utexas.edu/eos/>.

<sup>18</sup> See, <http://www.utexas.edu/eos/pres.html>.



“Statement on Equal Opportunity,” as found in its catalogs published for the Undergraduate, Graduate, and Law School, also fails to reference the Age Act, even though these materials specifically refer to other civil rights statutes, such as Title IX, the ADA, and Section 504.

NASA understands and appreciates that Age Discrimination Act compliance and related considerations have not garnered the same level of attention or interest in mainstream public debate, litigation, or scholarship as other civil rights laws, such as Title IX or the ADA, to name a few examples. As a result, the rights accorded under the Age Act are less well-known to those it is designed to protect. It is because of this that UTA may wish to consider steps to better publicize and disseminate Age Act information. (See Recommendations, below)

*c. Internal Discrimination Complaints Policy, Procedures, and Resolution*

UTA has in place procedures to intake, process, and remediate complaints of discrimination, including those related to age, which could ostensibly include complaints made under the Age Act. Further, there are at least two dedicated officials who are charged with oversight of all of the EO and Diversity functions, one of whom who is specifically assigned to CSE.<sup>19</sup> UTA’s submissions underscore a fairly comprehensive scheme and set of procedures for the resolution of complaints and violations. These materials lay out generic and understandable definitions of what conduct is prohibited and provide detailed procedures for filing a complaint, including the exact contents of the complaint document, and timelines for filing, anticipated resolution, remedial action, and rights of appeal.

Additionally, the aggrieved party may choose between an Informal and Formal Complaints Procedure. These materials also make reference, albeit slight, to the procedures’ coverage of the Age Act of 1975. NASA notes with approval that the procedures provide a step-by-step and intelligible roadmap to the aggrieved and all stakeholders as to what is required of them and what is to be expected. However, there is no reference that NASA was able to identify alerting the complainant or aggrieved party to the rights, timelines, and complaint procedures *outside* of the school’s internal processes (*e.g.*, with the Department of Education, or other state or local authorities).

UTA informed NASA that no complaints based on age from students in the AEEM program have been filed during the period for which information was requested. While NASA cannot draw any conclusion as to the effectiveness of UTA’s complaints processing, there was no indication from the review that the procedures are not functioning effectively.

*d. Orientation and Training*

UTA reported that it provides civil rights training to faculty and staff, which includes the Age Act.<sup>20</sup> However, based on a review of the material provided, NASA could find no indication of any formal or

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<sup>19</sup> Identified as Linda Millstone and Cynthia Brown.

<sup>20</sup> See, UTA’s Self-Evaluation Tool, at pp. 3, 13-15.

informal training regarding the Age Act, with the exception of the general references made to “age” in its overall antidiscrimination or EEO policies. This conclusion comes largely from NASA’s examination of EOS’s Web site and UTA’s Response to Information Request.

*e. Monitoring of Compliance and Self-Assessment*

With the exception of the policies and complaint procedures above, NASA did not find that UTA has any program in place that monitors compliance with the Age Act. However, it is also unclear whether the UTA maintains such proactive tools for similar statutes (*e.g.*, Title VI, Title IX, 504), in order to make an apt comparison.

**2. Recommendations**

*a. Policy Dissemination and Public Information Pertaining to the Age Act*

UTA should reference the Age Act on its EOS Web site, as it already does for similar grant-related and other civil rights laws. UTA may wish to consider enhancing the EOS Web site with a page dedicated to identifying and briefly explaining each civil rights law or mandate applicable to the Institution, including the Age Act. This page might include fundamentals of the laws and references to points of contact for further information or questions. This might also be accomplished by the use of links from the EOS Web site to the actual codified version of the statute or law and/or to the Federal agency or office charged with oversight and compliance. EOS and AEEM may wish to post on their Web site the NASA brochure on equal opportunity laws, including the Age Act, that pertain to grant recipient institutions,

*b. EOS Functional Role for the Age Act*

UTA may wish to consider establishing within EOS a “coordinator” for the Age Act akin to what it has done for Title IX and Section 504, although this is not a requirement under NASA’s Age Act regulations.

*c. Reference to External Administrative Procedures*

UTA should advise aggrieved persons or stakeholders of their rights and/or obligations outside of its internal grievance procedure so they are not misled or prejudiced with respect to external administrative procedures or potential private causes of action;

*d. Reference to and Discussion of the Age Act in Training Materials*

UTA should include some reference or discussion to the Age Act in their training of faculty and staff and other stakeholders.

### **3. Promising Practices**

#### *a. Documented Internal Discrimination Complaints Procedures*

As to internal discrimination complaints processing, including investigation, adjudication, remedies and penalties, UTA's policies and procedures are comprehensive and contain sufficient detail to place parties and stakeholders on notice of their rights and obligations, but are not too complex for parties who may not be familiar with legal or administrative processes.

#### *b. EO Staff Assigned to Academic Units*

UTA's EOS assigns staff to academic units such as CSE. This policy fosters stronger and more productive working relationships between EOS and the academic community and is an excellent means for UTA's EO staff to provide high-quality "customer service." Such relationships are critical to the provision of EO services, for example, ensuring that faculty, staff, and students have access to regular education and awareness opportunities, assisting the academic units in the review and analysis of demographic data that may help to identify potential EO related issues early on, and developing strategies to address issues when they arise.

## **B. Admissions Policies, Outreach Efforts, and Retention**

### **1. Analysis**

This area of inquiry was designed to evaluate UTA and AEEM admissions, outreach and communications efforts in light of the Age Discrimination Act's mandate to ensure equal opportunity regardless of age. NASA sought to determine whether, consistent with this mandate, UTA and AEEM reach out to students both traditionally and nontraditionally aged (*i.e.*, undergraduate students aged 25 or over and graduate students aged 30 or over).

#### *a. Admission Statistics*<sup>21</sup>

The University reported student profile data for its Undergraduate Program pertaining to the AEEM.<sup>22</sup> Of the students who applied to be first year freshmen in academic year 2008-2009, 241 of the 444 (54.3%) were accepted into AEEM and none who applied was nontraditionally aged.<sup>23</sup> It

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<sup>21</sup> UTA reported data on admissions and enrollment in many different sources, such as UT's Self-Evaluation Tool, UT's Attachments, and UT's Binder, Tab 1(Fall 2009 AEEM UG.xls, Fall 2009 AEEM GRAD.xls, and Statistical Handbook 2005-2006).

<sup>22</sup> The University reported that all undergraduate admission decisions are made at the University level by the Office of Admission. (See, UT's Self-Evaluation Tool, p. 14)

<sup>23</sup> In 2004-2005, 269 of 481 (55%) were accepted and none who applied were nontraditionally aged. In 2005-2006, 242 of 350 (69.3%) were accepted; one was nontraditionally aged but not accepted. In 2007-2008, 333 of 600 (55.6%) were accepted; one was nontraditionally aged but not accepted. (See, UT's Response to Information Request, p. 7)

appears that from 2004 to 2009,<sup>24</sup> two nontraditionally aged students applied to AEEM, but neither was accepted.<sup>25</sup> With respect to transfer students, 25 of the 81 who applied in that year were accepted. Twenty three (23) of the 71 traditionally aged students who applied (32.4%) were accepted into AEEM.<sup>26</sup> Two of the ten nontraditionally aged students who applied (20%) were accepted.<sup>27</sup> From 2004 to 2009, 31 nontraditionally aged students applied to transfer into AEEM and 8 of those students were accepted. Nothing in this data raises concerns regarding admission rates of nontraditionally aged students.

Nontraditionally aged students fared best in the retention category. In 2008-2009 academic year, 50 students, all of whom were traditionally aged, left AEEM and either changed majors or dropped out of the institution.<sup>28</sup> The University reported similar data for its AEEM Graduate Program. Of its graduate students admitted in the 2008-2009 academic year, 2 of the 20 were nontraditionally aged.<sup>29</sup> As stated above, 23% of AEEM's graduate student population is nontraditionally aged. Thus, further inquiry would be necessary to determine whether this data is internally consistent and what might be the potential causes for these results.

*b. Admission Requirements*

The University reported that all first-time college students, irrespective of age, are required to submit scores from either the Scholastic Aptitude Test (SAT) or American College Testing (ACT).<sup>30</sup> However, UTA does not require transfer students to submit these scores. It also allows exemptions for military service, certain SAT/ACT scores less than five years old, certain TAKS test scores less than three years old, and those who have previously attended accredited institutions of higher education. Therefore, no ACT/SAT score is required for transfer students. All students, including veterans, who apply as

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<sup>24</sup> Data was not provided for 2006-2007.

<sup>25</sup> See, UTA's Response to Information Request, p. 7.

<sup>26</sup> In 2004-2005, 22 of 52 (42.3%); in 2005-2006, 28 of 79 (35.4%); in 2007-2008, 18 of 57 (31.6%) traditionally aged transfer students who applied were accepted. (See, UT's Response to Information Request, p. 7)

<sup>27</sup> In 2004-2005, none of 6 (0%); in 2005-2006, 4 of 11 (36.4%); in 2007-2008, 2 of 4 (50%) nontraditionally aged transfer students who applied were accepted. (See, UT's Response to Information Request, p. 7)

<sup>28</sup> See, UTA's Response to Information Request, pp. 7-8. In 2004-2005, 134 students; in 2005-2006, 116 students; in 2006-2007, 108 students; and in 2007-2008, 97 students left AEEM. All students, save one, were traditionally aged.

<sup>29</sup> In 2003-2004, 1 of 15; in 2004-2005, none of 10; in 2005-2006, 2 of 14; in 2006-2007, 5 of 25; and in 2007-2008, none of 16 graduate students were nontraditionally aged. (UT's Response to Information Request, p. 9)

<sup>30</sup> In accordance with Texas Higher Education Assessment regulations.

Freshman are expected to provide SAT/ACT scores. In this regard, the University reported that its admissions process allows for reviews of individual records.<sup>31</sup>

In addition to the above requirement, the State of Texas requires students to be able to demonstrate a certain level of proficiency in math, reading, and writing, and the University tests all students accordingly. The results of these proficiency tests are used to place students into the courses most appropriate for them. According to the University's Web site, students may qualify for exemptions for the required placement tests with certain SAT or ACT scores or IB exam or transfer credits.<sup>32</sup>

To be admitted to CSE, freshman applicants must conform to more rigorous admission standards and also meet the calculus readiness requirement. The University Web site lists several ways in which this requirement can be met.<sup>33</sup> Students applying to the graduate program must either have a bachelor's degree in Aerospace Engineering, Engineering Mechanics or must meet minimum coursework requirements in Aerothermodynamics, Guidance and Control, Orbital Mechanics, and Structures. Students must meet rigorous academic standards, present a recommendation for admission, and submit GRE scores.<sup>34</sup>

The admissions criteria for undergraduates suggest some potential obstacles for nontraditionally aged students. The requirement that all incoming freshmen submit SAT or ACT scores could potentially eliminate from consideration a disproportionate number of adult learner applicants, due to the amount of time they have been away from a traditional learning environment and subject matter associated with these testing methods. However, the admission process does not require the same for transfer students<sup>35</sup> or those with military service and further provides for a potential waiver of admission testing scores, any of which could serve to remove this potential obstacle to nontraditionally aged learners in terms of the ability to gain admission.

Similar obstacles could be presented with the stricter standards and calculus readiness requirement necessary to apply to CSE. Unlike the UTA admissions exceptions, there appear to be no such exceptions to or alternate methods of complying with CSE's admissions criteria. While this could present a potential barrier to nontraditionally aged students, NASA recognizes the need to maintain

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<sup>31</sup> See, Self-Evaluation Tool, pp. 7-8 and <http://bealonghorn.utexas.edu/freshmen/admission/testing/index.html>.

<sup>32</sup> See, UTA's Attachments, pp. 170-174 and <http://www.utexas.edu/academic/mec/cbe/required.html>.

<sup>33</sup> See, <http://www.engr.utexas.edu/undergraduate/admission/calculus>.

<sup>34</sup> See, UTA's Binder, Tab 4 and <http://www.ae.utexas.edu/aerospaceGrad/gradProspect.html>.

<sup>35</sup> At the same time, it may be fair to assume that a portion of the transfers are persons returning to college after a leave of absence (*i.e.*, started a college program and then took leave for to pursue family, work-related or other interests). As a result, the transfer exception may mitigate the potential barrier of the SAT or ACT; but the proportion of transfers who fit the adult learner definition is not known.

rigorous standards for admission. Nonetheless, to the extent that UTA and CSE institutional policy on the SAT evolves, as it has at other major research institutions, the needs of nontraditionally aged students should be recognized as a consideration.

*c. Minimum Course Credit Requirements*

While students are permitted to plan their schedules for their individual situations, CSE requires that progress towards a degree be maintained. At present, the University sets no limit on how long a student can take to complete an undergraduate degree, although certain schools, such as CSE, have requirements that a degree must be completed within 6 years.<sup>36</sup>

CSE students may be eligible for course credit from an examination depending upon the student's test score and the test taken. Students may petition for credit by exam at any time during their studies, but if for a course in the Basic Sequence, it must be before they apply for a Major Sequence.<sup>37</sup> The opportunity to receive credit by examination may serve to lessen the burdens of those students who have gained knowledge either in school or the work environment. However, credit by examination is not accepted toward graduate degrees.<sup>38</sup>

During interviews, a few graduate students remarked that they were never clear on what coursework would be credited from their previous institutions. In some cases, students interviewed stated that they were unclear as to the prerequisites needed to succeed in AEEM. This appeared to be the case mainly with nontraditional graduate students coming from other disciplines within engineering, or who had studied at several institutions prior to coming to AEEM. On the other hand, nontraditional undergraduate students coming to AEEM from the Austin Community College (ACC) had benefitted greatly from the "Transfer Guide" between UTA and ACC detailing exactly which courses and prerequisites were needed. CSE/AEEM may wish to explore means of similarly assisting graduate students (see Recommendations, below).

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<sup>36</sup> See, UTA's Attachments, p.55 and <http://registrar.utexas.edu/catalogs/ug08-10/ch01/index.html>. A potential change in UTA policies could present an obstacle for older and other non-traditional students. At present, a task force is examining the effects of requiring students to complete their bachelor's degrees in 10 semesters, or five years. (See, <http://www.statesman.com/news/local/10-semester-limit-proposed-for-ut-degree-245464.html>)

<sup>37</sup> See, 2009-2010 Engineering Handbook, p. 56 and [www.utexas.edu/academics/mec/current.html](http://www.utexas.edu/academics/mec/current.html).

<sup>38</sup> See, [http://www.utexas.edu/ogs/student\\_services/academic\\_policies/](http://www.utexas.edu/ogs/student_services/academic_policies/).

*d. Orientation and Student Organizations*<sup>39</sup>

The University offers orientation programs for all incoming students, regardless of age and status as an undergraduate or graduate student. In the past, the school offered an orientation program that was geared toward nontraditionally aged students; however, it was cancelled due to lack of interest.<sup>40</sup> (See, UTA's Self-Evaluation Tool, p. 3) Additionally, the University reports that there are no offices, centers, or student organizations specifically focused on nontraditionally aged students. According to UTA's Response to the Information Request, there are more than 900 registered student organizations. Students are encouraged to self-organize by following the required steps as outlined by the Dean of Students Office.<sup>41</sup>

*e. Outreach*

This area of inquiry was designed to measure the University's efforts to market to and encourage the application and participation of adult learners. Reviews of the University's responses to the Self-Evaluation Tool and Information Request together with Web site references reflect an atmosphere in which no special or extra effort is expended to encourage and facilitate equal opportunity in education for adult learners.

The University, including AEEM, reported that it does not have marketing techniques or a plan in place to recruit nontraditionally aged students. However, it noted that it strives to reflect diversity in its student body, which includes nontraditionally aged students. (See, UTA's Self-Evaluation Tool, p. 10) The University attempts to show diversity of the student population through visual imagery on its Web site, depicting the presence and participation of adult learners in both undergraduate and graduate studies. (See, UTA's Self Evaluation Tool, pp.10, 13)

In its Self-Evaluation Tool, the University reported that the school does not conduct recruiting activities with local employers or to agencies assisting unemployed individuals. It reported that it participated in college fairs. (See, UTA's Self-Evaluation Tool, p. 10) However, on its Web site, the University indicates that it participates in a variety of activities and efforts designed to recruit prospective transfer students.<sup>42</sup> Its Web site states that its Office of Admissions communicates and

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<sup>39</sup> The sections on Orientation, General Student Services, and Offsite or Off Hours Learning, are described in much greater detail in the section dedicated to Access to Programs and Facilities. NASA addressed the items in this section as well, but focused on the needs of prospective, applying, or newly accepted students.

<sup>40</sup> Attendance was reduced to six individuals and students requested the separate program be discontinued. (See, UT's Self-Evaluation Tool, p.3).

<sup>41</sup> See, UTA's Response to Information Request, p. 5 and [http://deanofstudents.utexas.edu/said/soc\\_newgroup.php](http://deanofstudents.utexas.edu/said/soc_newgroup.php).

<sup>42</sup> NASA could not determine whether these two sources of information conflict or are consistent with one another.

interacts with admissions officers in state junior and community colleges to keep them informed about the transfer admissions process and related policies at UTA Austin; holds a Training Conference to provide in-depth training on transfer issues; and distributes a transfer newsletter dealing with policy and process issues. In addition, upon request, the Office of Admissions makes periodic visits to community colleges and business/industry locations in the Austin area to provide information about admission, academic programs and student services at UTA Austin.<sup>43</sup> While these actions are not specifically geared toward nontraditionally aged students, nontraditionally aged students may very well benefit from these outreach efforts.

In its response to NASA's Information Request, the University stated that it does not have a "formal program" to reach out to nontraditionally aged students. Recruitment efforts, particularly at the graduate level, seek to identify the most talented students, irrespective of demographic data. However, CSE conducts various information sessions, which are "open to everyone." (See, UTA's Response to Information Request, p. 6)

*f. Retention Statistics*

In 2008-2009 academic year, 50 students, all of whom were traditionally aged, left AEEM and either changed majors or dropped out of the institution. In 2004-2005, 134 students; in 2005-2006, 116 students; in 2006-2007, 108 students; and in 2007-2008, 97 students left AEEM. All students, except for one, were traditionally aged. (See, UTA's Response to Information Request, pp. 7-8) No data was provided for graduate student retention. According to the University of Texas's Viewbook 2010-2011, 91.9% of freshmen, who were enrolled during the 2006-2007 academic year, returned to the university for the 2007-2008 academic year. No demographic data was provided from which NASA could glean possible reasons or causes for the 8% of students who failed to return.

*g. Summary*

Overall the presence of older students in the program, particularly at the undergraduate level, appears to be a very important and positive aspect of the program's diversity. AEEM faculty showed a clear appreciation for the diversity that nontraditional students bring to the academic environment. A number of professors interviewed stated that older students, particularly in the undergraduate context, brought a level of maturity and insight, gained from experience in the work world, to classroom and research activities. Professors also reported that in their experience older students had greater confidence and focus of purpose than many of their traditionally aged peers. Older students themselves, particularly, undergraduate students, reported that they believed the fact that they were older was very much to their advantage for the same reasons as the faculty. In particular, several older students reported that they felt their greater experience and maturity were factors in

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<sup>43</sup> See, <http://www.bealonghorn.utexas.edu/transfer/admission/recruiting/index.html>.



their taking leadership roles in important work-study initiatives that helped to advance their opportunities through networking.

## **2. Recommendations**

### *a. Regular Examination of Student Statistics by Age*

UTA, CSE, and AEEM should regularly examine application, acceptance, and retention statistics of the student population by pertinent age categories. Such periodic self-audits could help to ensure that there is not an abnormal disparity or deviation in the numbers of students in or from any category of age group. They also could assist in further exploring the impact of current policies and practices on nontraditionally (and traditionally) aged learners, allowing for an institutional assessment as to any potential issues regarding key facets of the program, e.g., admissions, outreach, or access to programs and facilities. In turn, a better understanding of student perceptions in these areas may help to craft policies and strategies to address concerns raised.

### *b. Education and Awareness*

EOS may wish to consider providing UTA, CSE, and AEEM with additional educational opportunities for faculty and staff designed to improve awareness and consideration of issues confronting nontraditionally aged students, such as family or work responsibilities.

### *c. Promotion of Student Organizations*

UTA and CSE may wish to consider efforts to actively promote student organization geared at least in part toward nontraditionally aged students. For example, a student advisory board, comprised of nontraditionally aged and commuter students, may add important perspectives to the impact of current programs for nontraditionally aged students, and may also suggest improvements or additions to services.

### *d. Outreach Efforts*

CSE and AEEM may wish to consider improving outreach to include learning institutions, organizations, and/or employers, in which they are likely to reach nontraditionally aged learners. They also may consider a marketing program geared toward recruitment of former and active duty military members, a group of individuals with a large number of nontraditionally aged students. In this regard, CSE and AEEM may wish to consider enhancing the visual imagery of their Web sites and promotional materials to show both traditionally and nontraditionally aged students, including veterans. Additionally, CSE and AEEM may wish to incorporate statements from both traditionally and nontraditionally aged students in the programs, showing pictures of the students, and describing how the programs was able to meet their needs. Finally, UTA and CSE may wish to consider exploring scholarships that are targeted toward nontraditionally aged students, including veterans and disabled veterans.

*e. Increased Emphasis on Mentoring Programs*

CSE/AEEM may wish to provide more information to incoming graduate students on available graduate programs. In this regard, NASA notes that the CSE Women in Engineering Program (WEP) has a mentoring program specifically designed to reach out to nontraditional students. WEP's approach could be replicated throughout the larger CSE, in part to better help new CSE graduate students, both nontraditional and traditional to better acclimate and prepare themselves for the learning environment.

**3. Promising Practices**

*a. Waiver of SAT/ACT Scores for Transfer Students and Other Flexibilities*

UTA does not require transfer students to submit SAT/ACT scores. This could assist nontraditionally aged learners, many of whom are transfers, because it removes the reliance on SAT/ACT scores which could otherwise serve to eliminate from consideration a disproportionate number of applicants.

Although the University requires student testing to place students in appropriately-leveled courses in math, reading, and writing, it allows for exemptions with certain SAT/ACT scores, IB exam, or transfer credits. Students may be eligible for course credit from an examination, which may lessen the course load in a Basic Sequence.

*b. Demonstrated Commitment Through Information Dissemination*

The Institution demonstrates its commitment to all UTA and CSE students, whether prospective or current, by providing a Web site with a broad range of information, services, and tools, many of which are available 24 hours a day, 7 days a week. The Institution appears to recognize that learners, who have family and/or work considerations, may require access to information, services, and tools outside of regular business hours.

The University Web site offers information on numerous opportunities for tutoring and workshops, such as Achieving College Excellence (ACE), which offers academic support programs and graduate school preparation workshops. The Welcome Program offers students an opportunity to meet representatives from student organizations and obtain free tutoring, set educational goals, and attend leadership conferences. All elements of these programs, which are offered to all students regardless of age, could serve to bolster student success, whether it is academic, work related, or geared toward meeting the stringent graduate school application requirements.

*c. Student Remediation and Transition Assistance*

It appears that the University makes every effort to help students succeed, regardless of age or other demographic category. The University offers remediation to students and prospective students in math, science, reading and technology, which is traditionally relied upon, not only as part of core admissions criteria, but to satisfy core (course) requirements needed to earn a degree. UTA has an

“Transfer Guide” with the Austin Community College that helps to students who plan to transition to UTA by providing a roadmap on exactly what courses they will need to take.

Further, the University offers coping programs designed to address and help students achieve a balance between the demands of home life, work and school, signaling an environment that is understanding of the stresses on adult learners and seeks to promote their ability to succeed. One such example is the “UTAransition” program, which aids recruitment and retention by offering a variety of resources and services to transfer students, such as: Academic Support; Social, Cultural, and Recreational Activities; Peer Mentoring; Free Tutoring; Individual Counseling; Graduate School Preparation Support; Leadership Conferences; and Study Skills Workshops.<sup>44</sup> In addition, the Longhorn Center for Academic Excellence assists all students.<sup>45</sup> Within CSE, students may participate in a variety of programs to assist them with their academic and career goals and connect them to peer mentors in their majors, such as Engineering Career Assistance Center (ECAC), Equal Opportunity in Engineering (EOE), Office of Student Life (OSL), Engineering Scholarship Program, Women in Engineering Program (which has a mentoring program specifically for nontraditional students), and First Year Interest Groups (FIGS).<sup>46</sup> General Engineering Courses (Supplemental Instruction for Math, Physics and Chemistry) are offered and tutoring study tables are available to all students at night.<sup>47</sup>

While generally not aimed at the nontraditionally aged learner, such services tend to improve the likelihood of success of those students.

*d. Web Site Inclusion of Images of Nontraditionally Aged Students*

Consistent with NASA’s recommendation , the University informed NASA that the AEEM Department is undergoing a web redesign and the Department Chair has informed the redesign team that nontraditionally aged students, along with other examples of the University’s diverse student body, should be reflected in the new web pages and other promotional materials.<sup>48</sup>

**C. Access to Programs and Facilities**

**1. Analysis**

This aspect of NASA’s inquiry focused on access of students to AEEM’s programs, facilities, amenities, and services, and the extent to which the University and AEEM ensure equal access regardless of age.

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<sup>44</sup> See, <http://www.utexas.edu/diversity/ddce/lcae/utransition.php>.

<sup>45</sup> See, <http://www.utexas.edu/diversity/ddce/lcae/>.

<sup>46</sup> See, UTA’s Self-Evaluation Tool, p. 4 and <http://www.engr.utexas.edu/undergraduate/services>.

<sup>47</sup> See Millstone letter.

<sup>48</sup> See Millstone letter.

In this regard, NASA notes that the University offers a wide variety of programs and facilities that are available to all of its students. These include advising, health services, child care, and tutoring services, among others.

*a. Classes and Labs*

The maximum credit level allowed by CSE allowed is 17 credit hours per semester. However, students may request permission to take up to 21 credit hours per semester. In 2009, the University removed a 14 credit hours per semester minimum requirement. Three students interviewed, two graduate and one undergraduate, indicated that they had, at one time or another, taken less than that minimum course requirement. NASA is pleased to note that the University no longer has this minimum requirement as it may have an impediment to the nontraditionally aged learner, particularly those who are employed and have familial obligations, however no student interviewed indicated that they felt this was an impediment for them during the period when the policy was in place.

UTA's responses to NASA's Self-Evaluation Tool indicated that the University was taking certain steps to fully ensure equal access to its programs and services regardless of age. For example, the University responded that it had an orientation session specifically geared towards commuter students, who are more likely to fall within the nontraditionally aged category than non-commuter students. However, as indicated above, this program was discontinued. AEEM students interviewed during the onsite indicated that as a general matter classes are scheduled during business hours, with the exception of some lab classes which are scheduled in the early evening. A few students interviewed, both nontraditionally and traditionally aged, stated they would like to see more emphasis placed on greater accessibility, for example, online coursework. However, no older student, either graduate or undergraduate, stated that he or she felt they were in any way prevented from taking full advantage of learning opportunities in AEEM.

*b. Advising*

The vast majority of students interviewed, both traditionally and non-traditionally aged, said that advisors made themselves available to students in person during regular business hours and by phone and email. The Department encourages faculty to let students know that they are available during regular advising hours as well as by special appointment. For example, several graduate students interviewed, who are employed full time while pursuing PhDs, reported that they have excellent working relationships with their faculty advisors and are able to communicate with them via email and telephone virtually any time.

In the undergraduate realm, as is the case at most large research institutions, access to undergraduate advisors is not as liberal. At UTA, while it is apparent that AEEM faculty and the institution as a whole are demonstrably committed to the learning experience of the students, it appears that access to faculty members for undergraduates is generally limited outside of non-standard business hours. Access during non-standard hours may be critical to older learners (and/or those with jobs), who may be otherwise unable to avail themselves of these services due to family

and work commitments. For example, one concern raised during the review was from a non-traditionally aged undergraduate student who held a job working from 12 pm to 5 pm daily. This student said that working during these hours presented challenges in accessing advising and study groups, which tend to meet during the day. Ultimately, the student said that he decided to stop working. While this reflects an isolated instance, and it appears the student did not attempt to make a special advising appointment, it does suggest the need for the department to continue to consider ways to ensure that it is welcoming and inclusive to its broadly diverse student body.

The concern here is not so much with the availability of advising. NASA notes that the program has long taken steps to mitigate this potential problem by encouraging faculty members to make themselves available for special appointments. Rather, the student appears to have been unaware of available opportunities, such as night-time study groups.<sup>49</sup> To the extent that it has not already done so, the AEEM program may wish to consider steps to address this, such as greater efforts to encourage networks or affinity groups among AEEM students and greater efforts to disseminate information about available opportunities for organized night-time study.

*c. General Student Services*

The University reported that its Office of Admissions, Accounting Office, and Office of Student Financial Services operate during regular business hours, but noted that there were a few exceptions for special events. The Registration Office, however, has evening and weekend hours. In addition, the University maintains a full service online system which provides a full menu of resources, services, and tools covering everything from online application submission and checking status of applications, to scheduling a campus visit, communicating with current students, and handling tuition. The online system also handles financial aid, loans, scholarships, registering for classes, viewing or requesting transcripts, grades, degree audits, and the like.<sup>50</sup> Moreover, its Information Technology Services department provides technology instruction, assistance, and hotline assistance to all Web site users and offers evening and weekend hours.<sup>51</sup>

*d. Off-Hour/Offsite Learning*

CSE reported that it offers a few core courses in the evenings, but generally not on weekends. (See, UTA's Self-Evaluation Tool, p. 13) All regular courses are taught on the main University campus.

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<sup>49</sup> Millstone letter, App. A.

<sup>50</sup> See, UTA's Self-Evaluation Tool, pp. 5-7 and <http://bealonghorn.utexas.edu/index.html/>; <http://www.utexas.edu/business/accounting/br/>; <http://registrar.utexas.edu/>.

<sup>51</sup> See, UTA's Self-Evaluation Tool, p. 9 and <http://www.utexas.edu/its/fac/>.

However, some are taught at the Pickle Research Campus and students may participate in the International Engineering study abroad program. Undergraduate courses are generally not available online. However, there are some university extension and online courses which can be approved for credit. The CSE's Center for Lifelong Engineering Education (CLEE) also provides a number of learning opportunities outside of normal business hours, including a Master's Degree in Engineering Management (see Promising Practices, below).

*e. Career Services*

Career assistance specifically geared towards engineering students (whether for summer, internships, or full-time employment) is available from 8:00 a.m. to 5:00 p.m. (See, 2009-2010 Engineering Handbook, p. 68) A focus on the nontraditionally aged learner, particularly one with family and/or work priorities, might be access to these services after normal hours. This is mitigated somewhat by the availability of on-line access to information, resources, and services. The Director of the Career Services Center informed NASA that plans are underway to extend the hours of operation of the Center to 7 p.m. one night at week as a pilot program, with an assessment to be conducted of the pilot's effectiveness in meeting student needs.<sup>52</sup>

*f. Health Center Services*

The University's Health Center is a model for access regardless of age. The Health Center is fully staffed with medical professionals versed in health issues for students and faculty of all ages. According to its Senior Program Coordinator, the Health Center currently provides care to students ranging in age from their late teens to their early 80s. The Health Center has weekend hours, an advice nurse available 24/7 for health related questions, and mental health counseling by telephone also available on a 24/7 basis. In addition, an urgent care facility is available on weekends. Importantly, the Health Center maintains a database that allows health care providers to access and share with information with patients on virtually any medical condition. While the concept is by no means unique to UTA's health services, it is an excellent means of ensuring that the Health Center has the capability to deal with health issues regardless of age.

A review of the Health Center's Web site shows that issues such as excess alcohol consumption and sex education, including pregnancy prevention, are understandably highlighted. However, as mentioned, the Health Center has the capability through its trained health providers and online resources to deal with health issue typically acute to nontraditionally aged or older students, should they arise.

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<sup>52</sup> Millstone letter, App. A.

*g. Student Housing*

UTA 's University Apartments is designed to accommodate single as well as married students. These residences include one, two, and three bedroom apartments and can accommodate a limited number of students with spouses and children.

*h. Summary*

Overall NASA's review found very few concerns regarding access to programs and services. Students interviewed, both traditionally and non-traditionally aged, expressed satisfaction with regard to labs, computer facilities, financial aid services, health services, and student housing. If there is any concern in this regard at all, it lies with the fact that UTA has long been and remains, as a matter of institutional policy, a "daytime" educational institution and efforts toward developing a night-time program have generally been limited. This may have the effect, among other things, of discouraging an otherwise well-qualified non-traditionally aged learner from applying to the University's programs, including AEEM. While the Age Act regulations do not require recipients of federal financial assistance to take such steps, UTA may wish to consider, as a matter of institutional diversity policy, greater emphasis on night-time and weekend course offerings and other forms of alternative program delivery (see Recommendations, below).

The chart below is intended to provide UTA with a summary of information on the availability of programs and services as it might be viewed by nontraditionally aged students, to assist in helping UTA to shape future program accessibility policy.

Program/Service	Availability	Comments
<b>Counseling – Mental Health Center</b>	Regular business hours; by telephone 24/7	The documents do not indicate that counseling specific to adult learners is available, but it is notable that services are available 24/7 by telephone. (See, UTA’s Attachments, p. 89)
<b>Mentoring</b>	Varies	Information supplied in support of the UTA desk audit indicated that a program specifically geared toward adult learners would start in 2009. However, the documents submitted do not reflect any mentoring program specifically geared toward adult learners. CSE does provide mentors for students in the program and there is a specific group for transfer students. Peer leaders (upper division engineering students) are available to provide advice and assist with the development of students. (See, UTA’s Attachments, pp. 84 & 87)
<b>Health Center</b>	8:00 – 5:00	Regular appointments can only be scheduled during normal business hours. However, the urgent clinic is open on weekends. In addition, an advice nurse is available by telephone 24/7. (See, www.healthyhorns.utexas.edu)
<b>Registrar’s Office</b>	Regular Business Hours	While the office is only open for regular business hours, the Web site provides information to students. Additionally, registration for classes is available during evening and weekend hours.
<b>Tutoring</b>	Evening and weekend hours are available	Tutoring is available and the CSE has specific tutoring programs. The University also offers the learning center which offers tutoring. (See, UTA’s Attachments, p. 95).
<b>Transportation Services</b>	Varies	Shuttle services are provided based upon the time periods classes are in session. Most nights the shuttle services run as late as 11:00 p.m. (See, UTA’s Attachments, p. 108)
<b>Child Care</b>	Weekdays 7:15 a.m. – 6:00 p.m.	This is the type of service that may be more likely to benefit the adult learner than the typical-aged college student. However, because services are only offered during regular business hours, the benefits of this type of service may be minimized. (See, UTA’s Attachments, p. 116)



Program/Service	Availability	Comments
<b>Student Groups/ Organizations</b>	Varies	Students can form their own organizations if current groups or organizations do not meet the needs of a group of students. (See, UTA’s Attachments, p 12) There was not a specific reference or document provided that related to a current student group geared specifically for the nontraditional student.
<b>Faculty Access</b>	Varies	Faculty hours vary based upon the faculty member, but students do have communication available through the Blackboard and email. Specific information was not provided with respect to AEEM, other than a statement that some faculty members may be available during evening hours.
<b>Labs</b>	Varies	Information for lab hours was provided only for AEEM. The Institution reported that lab hours were available both on weekends and evenings.
<b>Academic Advisement</b>	Varies	The University indicates that the hours are specific to each school, but during times when there is a high demand (i.e., registration) the University may extend hours into the evening. Specific information was not provided with respect to AEEM.
<b>Bursar’s Office</b>	Regular Business Hours	While this office is only open during regular business hours, information is provided online regarding payments, scholarships, balances owed, loans, and costs. (See, UTA’s Attachments, p. 101)
<b>Office of Disability Services</b>	Regular Business Hours	This office only has regular business hours, but staff can be contacted via email. (See, UTA’s Attachments, p. 103; www. Utxas.edu/diversity).
<b>Career Center</b>	Regular Business Hours; however open to 7:00 p.m. one night a week	The Career Center has much information on diversity in careers related to race and gender (such as women in math and engineering), but no programs focused on career issues that may be related to an older student. ( <a href="http://www.utexas.edu/student/edu">www.utexas.edu/student/edu</a> ). There is also a separate Career Center for engineering students (“ECAC”) with regular business hours. (See, 2009-2010 Engineering Handbook, p. 68).
<b>Financial Aid Office</b>	Regular Business Hours	While the financial aid office is open regular business hours, access to information and answers to questions can be made through the University’s “Ask Don”. (See, <a href="http://www.finaid.utexas.edu">www.finaid.utexas.edu</a> )

Program/Service	Availability	Comments
<b>Scholarships</b>	N/A	There are a variety of scholarships available. There are scholarship programs available under the “Engineering Scholarship Program” that are only provided to engineering students. These scholarships appear to be primarily based on merit. (See, 2009-2010 Engineering Handbook, p. 69)
<b>Research Assistant/Teaching Assistant &amp; Fellowship Awards</b>	N/A	The graduate program offers a number of Research Assistant, Teaching Assistant, and Fellowship awards to incoming graduate students. These provide stipends and tuition waivers. No data was provided concerning the number of incoming graduate students receiving these awards.

## **2. Recommendation**

### *Greater Emphasis on Expansion of Educational Program Delivery*

UTA, and CSE/AEEM in particular, may wish to consider expansion of its educational programs to include greater emphasis on night-time and weekend course offerings. In taking steps toward policy changes along these lines, the University may wish to consider a thorough institution-wide review of access to programs and services, including a survey of students with responses broken down by age, full or part-time status, and other demographic categories. The driving factor in such a review would be to better determine whether additional efforts should be undertaken to make educational programs and services more accessible.

In this regard, UTA and CSE/AEEM, perhaps utilizing the expertise of the Center for Lifelong Engineering Education, also may wish to consider building additional online learning platforms and video-taping of lectures. Such efforts may be particularly appropriate in the undergraduate setting. For example, CSE/AEEM may wish to focus only on required courses for engineering students outside of the engineering discipline, such as liberal arts courses required to complete an undergraduate engineering degree. Another example: faculty are required to post course syllabuses online; CSE/AEEM may wish to explore ways of encouraging more faculty to post other documents online.

CSE/AEEM may also wish to explore establishing stronger and more structured partnerships through reciprocity agreements with local businesses and government agencies, such as NASA's Johnson Space Center. Such partnerships may help to establish programs that can meet the needs of the local engineering community for continuing education, for example, programs that would require only a limited time on campus.

NASA is pleased to note that, consistent with this recommendation, the AEEM Dept., in collaboration with Electrical Computer Engineering, is exploring the possibility of developing a Masters of Science (MS) degree in systems engineering to be offered to nontraditional students and engineers in industry. The curriculum is being developed by Armand Chaput (adjunct professor at UT, retired from industry) and Lisa Guerra (from NASA). The program will be similar to the MS programs offered by the Center for Lifetime Engineering Education (CLEE) and would be offered through this Center which has experience in offering such programs to non-traditional students. If sufficient interest in an MS in Systems Engineering is identified, the degree program will be offered on a pilot scale, and then scaled up as needed.<sup>53</sup>

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<sup>53</sup> See Millstone letter at App. A.

### **3. Promising Practices**

#### *a. General Access to Services*

In terms of access to services and facilities, it is clear that the University demonstrates its commitment to all UTA and CSE students, whether prospective or current, in innumerable ways. Importantly, the broad range of information, services, and tools that the University has to offer is generally available on UTA's Web sites, and therefore accessible 24 hours a day, 7 days a week. In this regard, the Institution provides most information, whether financial aid, academic advising, registration, etc., online. In addition, UTA provides additional support for students in a number of ways: students are encouraged to form affinity groups; evening and late-night transportation services are available when classes are in session; tutoring is available during evening and weekend hours; and child care is available to both students and faculty with children.

#### *b. Access to Advising*

Faculty members are available to students via email or by making after normal business hour appointments. Importantly, AEEM encourages faculty to be mindful of the need to maintain alternative availability through special appointments and via phone and email.

#### *c. Health Services*

The Health Center has weekend hours, an advice nurse available 24/7 for health related questions, and mental health counseling by telephone also available on a 24/7 basis. In addition, an urgent care facility is available on weekends. Importantly, the Health Center maintains a database that allows health care providers to access and share with patients information on virtually any medical condition. While the concept is by no means unique to UTA's health services, it is an excellent means of ensuring that the Health Center has the capability to deal with health issues regardless of age.

#### *d. Center for Lifelong Engineering Education*

UTA's Center for Lifelong Engineering Education (CLEE) is a model of accessibility for students, regardless of age. For example, the CLEE has a Master's Degree program in Engineering Management (a discipline that is part of AEEM) tailored to the needs of working students. This program provides an opportunity to pursue a master's degree while continuing to work full-time. CLEE also offers a host of programs and resources, including eTraining, certificate programs, short courses and conferences.

### **CONCLUSION**

Based upon its limited scope review, NASA finds that UTA is in compliance with Age Act regulations. In fact, there are many strengths in UTA's and CSE/AEEM's programs regarding Age Act compliance. For example, UTA has a sound internal discrimination complaints policy and well-designed procedures detailing investigation, adjudication, remedies and penalties. With respect to admissions, outreach, and retention, the University does not require transfer students to submit

SAT/ACT scores. In addition, the University attempts to show diversity of the student population through visual imagery on its Web site depicting the presence and participation of adult learners in both undergraduate and graduate studies. Importantly, the University appears to make efforts to help students succeed, regardless of age or other demographic category, by offering remediation, coping programs, and programs to support recruitment and retention to students and prospective students.

In terms of areas for improvement, NASA recommends that the University enhance its civil rights informational and training materials to refer specifically to the Age Discrimination Act, and provide practical examples of how the Act may affect the University, such as ensuring equal opportunities for both traditional and nontraditional adult learners.

In addition, UTA may wish to consider broader changes to institutional policy that would expand access for nontraditional learners to its programs and services through expanded night-time and weekend course offerings, and alternative forms of program delivery, e.g., greater focus on online platforms and video-taping. While the Age Discrimination Act does not require affirmative efforts that may facilitate education for nontraditionally aged (and other) students, such efforts are entirely consistent with the purpose and intent of the Act and NASA's implementing regulations.