



FACULTY SENATE

Minutes

May 7, 2019, 6:00 PM, the Sunset Meeting Room of the College Union (Klamath Falls) and Conference Room #130 (Portland-Metro).

Attendance/Quorum

President Terri Torres called the meeting to order at 6:00 pm. All senators or alternates were present except Kevin Pintong, Josh Jones, Gary Kuleck and Tom Keyser.

Approval of Minutes

Minutes from the April 2, 2019 meeting were approved.

Reports of Officers

Report of the President – Terri Torres

- I would like to first report that you have a notice from Dr. Naganathan explaining our new calendar that will go into effect in the fall of 2020. I would like to thank all of those as well as the ad hoc committee who worked on this project, as it was a long process. There has been assurance from Dr. Naganathan on convocation and that it was preserved and changes will be happening during that week.
- Senate committee selection will be done by the next time we meet, which means that if you have some requests please send them to me and I will try to get you on the committees that you would like to serve on. As far as the university committees, Dr. Kuleck and I are working on those and are about one third of the way through the academic committees and our plan is to finish those by the end of the year. Farooq has done all the background work and has it all on spreadsheets so that we know where you are serving and where you have served. In the future when you go up for promotion, you will be able to type your name in and it will give a list of the committees you have served.
- I would like to thank all of those especially Dr. Kuleck for addressing the timeline issues that we spoke about at our last meeting regarding Monica and Vanessa. The issues have been resolved.
- The Provost search committee has four candidates that will be coming to campus. I recommend attending these presentations.
- I would like to thank Dr. Naganathan for hearing faculty with regard to positions on campus. Remember we asked that even if there is an internal position that it would be open so that anyone could apply for the positions.
End of my report

Report of the Vice President – Matthew Sleep

- The elections are open. I would like to encourage people to vote for ETM, HAS and at-Large Representatives.
 - There are four items on the agenda discussed at Academic Council that met two weeks ago. The first item is that the Provost read a statement that faculty members were putting union activities on their APES. The Provost advised department chairs this action is not allowed.
 - Jim Jones was supposed to attend our meeting to talk about IT issues and the computer replacement process, but he was traveling and unable to attend. However, Farooq attended and discussed workload, inputting it in Banner and FAST. There was a lot of discussion amongst department chairs and Farooq trying to figure out how to go from putting workload units in a spreadsheet to doing it in Banner and FAST and having it be more automated.
 - There was some discussion about hiring for 2021, in which the form was emailed, but there was no deadline included or determined on when to submit these hiring requests.
- End of my report

Report of the ASOIT Representative – Junmin Yee

- ASOIT has moved forward recommending the 9% tuition increase for the up-and-coming academic year, with the understanding that the state needs more funding and will use the tuition percentage increase.
 - On a lighter note today and tomorrow is the blood drive, so please donate.
 - Last Saturday was the international dinner where a number of clubs got together to display their countries' diversity. The dinner was a success and tickets sold out.
- End of my Report

Reports of Standing Committees

Faculty Rank Promotion & Tenure (RPT) – Ben Bunting

- First, we will have updates to the policy 21-040 at the next meeting for everyone to vote on.
- Next, is after a number of discussions this year within RPT about promotion criteria and evaluation process for faculty, it was recommended that they might be made more clear, more precise, and more defined. We suggested a couple weeks ago to SenEx that there should be language included in the contract stating that a Senate approved group would eventually draft in the fall an evaluation rubric. Something that is more specific and more concrete than we currently have, based on the list of criteria in the policy. Since then, we have been tasked with generating at least a first draft of that evaluation rubric.
- I also asked if anyone had any comments or questions about the draft NTT Promotion Policy Report that was included in the Senate packet, but there was no discussion.
- End of my Report

Faculty Welfare – Yasha Rohwer

- Faculty Welfare is charged to review certain policies; the ones that we focused on were the “Civil Rights policy” and the “Title IX policy and procedures.” Faculty welfare has reviewed the issues and met with our Title IX coordinator Tonya Coty. We discussed all comments and in return gave feedback. Tonya is tasked with revision as well, and is talking to a lawyer about the issues.
- Second item on my agenda to report, is the “Online Advisory Council quality draft policy” that you all should have received in your packets. Faculty Welfare is charged by SenEx to review this policy and after review, we found a number of concerns, therefore, we met with Dean Veth and talked to her about those concerns. Our concern is that if the online class is taught incorrectly, then a class could be pulled right out from under a student and this would impede graduation, and harm faculty welfare. We were worried about this and we got language in the draft policy so there is sort of a probation period. The advisory Council went back and revised the policy in terms of our concerns. This is something that should be very important to this institution and we should pride ourselves on our education that we give to all students and so if we have one class failing in pedagogy, that harms the entire university. Our online colleges had a hard time enforcing this and one of our commitments is to try to get the Department Chair’s back involved. Not only is the faculty member going to get a warning but their Chair will also get a warning in which the Chair should take on their responsibility as a Chair to make sure that that faculty fixes the problem in pedagogy occurring. However if the Chair does not act, for whatever reason, then the policy will allow Oregon Tech Online some way to ensure that quality education is being delivered. I am asking that we vote on this policy and approve this policy.

Motion Passes

End of Report

Academic Standards – Veronica Koehn

- Our charge was to look at a formal credit hour policy that Northwest and the federal government require. Oregon Tech has an idea and it is in the catalog but it is not a policy. Therefore, we have written our own policy taken from the catalog. I put the full text of what Northwest is looking for, which you will find linked up as a pdf. Here are some examples: a quarter credit, credit hours and the amount of work represented intended learning outcomes and verified by evidence of student achievement. It is an institutional established equivalency the reasonably approximate is not less than one hour of classroom or direct faculty instruction and a minimum of two hours out of class student work each week for ten weeks for one-quarter hour of credit or the equivalent amount of work over a different amount of time. In academic standards: if you teach a Monday, Wednesday, and Friday class and it’s not a lab it’s just a class 50-minutes of time and, then we round that up to an hour you get three of them that gives them an hour times three so, three credits. At least an equivalent amount of work is required in paragraph one of this definition for other academic activities as established by the institution. This includes laboratory work, internships, practical studio work and other academic work leading to the award of credit hours, a numerical credit value and assigned a certain number of lecture or laboratory hours. A lecture class meeting for three – 50 minute periods a week and assigned three units of credit. Students traditionally have been expected to spend an additional six hours of outside classwork per week for each three units of lecture class credit. Generally, a lab class requires three hours per week for one unit of credit for a total of nine in lab hours with no additional outside classwork expected for the three units of lab credit. A little background, in formally adopting this Oregon Tech credit hour policy we are now fulfilling requirements put in place by Northwest that require adopting this formal credit hour policy. Engaging in the first review of our credit hour policy reviewed periodically by Northwest, they have been telling us often, but it is

periodically, so this would be creating it and doing our first review. Emergency management is currently researching what to do when we cannot come to class. They might follow up on situations where we are not able to meet. For example winter term this year when we had a couple of snow days, And I think it was Portland-Metro last year or this year, that missed a whole week due to weather, so obviously we are coming up short on the credit hours. Online Advisory Council (OLAC) may add information on how this policy applies to online and blended courses. There is no guarantee that they will do this as they would like the option to remain open at this time.

- Next charge and one that I would like the Senators to take back to their faculty for review and input. They are trying to recruit more first-time freshmen students and what they found is that the retention rate of freshmen from the first to the second year is 79.5%. There is a 14.8% difference in retention of students who have less than four years of math in high school compared to four or more years. Eric from admissions proposal is to update our admissions criteria effective for 2021 that will add a 4th year of high school math. Therefore, Terri has submitted it to me and I am bringing it to you, so please talk to your faculty and let me know what they think.
 - The next thing I wanted to bring up is that we actually tabled our thoughts on a C or higher for every Gen-Ed class.
- End of report

Faculty Compensation (FCC) – Eve Klopff

- We have had one meeting since our last Senate meeting. We are going to have to evolve, therefore, we have been charged with trying to determine how things are going according to the stated policy, in other words are we doing what we are supposed to be doing. I would like to turn the report over to Joseph Reid.
- Joseph Reid – Please see addendum below. Two years ago MGT did a study for our university in which they came up with a set of comparators for us to use as well as compensation ranges rather than floors that are plus and minus 12.5% on the averages from CUPA. The first table is supposed to be ranges for each of the two digit CIP codes that we report under for each of the categories. Unfortunately, this excludes librarians at this time. That is a completely different study. I would like to point out at the time Communication department was the lowest of the group, therefore, it was bumped up for compensation purposes to report under the second lowest which I believe at that time was 42 for psychology and HSS reports under that. Group nine does not report under that and the group 52 for management is the highest. Additionally management usually gets paid \$14,000 lower than engineering rate versus their comparators and that is the traditional. These are the numbers from 2017 since then we have had 2% cola adjustments that is what table 2 indicates. After representing those, notice that would be what the floors with the 12.5% below the CUPA average and the CUPA averages that would be expected to be based off of the MGT studies from two years ago, just based on the COLA. The question asked by a lot of faculty for the last couple of years is what are the floors now? Human Resources have not updated them, and this is what we expect the floors to be had they only adjusted them based on cost-of-living and that is before you remove the \$3,359.58 for the benefits differential. If you subtract the \$3,359.58, you get what the floors are operating under. There has been some questions as how they implemented that and the answer is, “We do not know.” Some people were under the impression that they removed it from everyone’s salaries automatically, others think they just removed it from the floors and therefore it only affected new hires and people that have been promoted. We actually do not have an answer. I have emailed Human Resources a couple weeks ago and they have not responded. The other thing I should tell you is this is only a partial report.

The other part of our job is that we are supposed to go through and look at all the faculty members in all the departments and make sure that nobody is below floors. We will be completed an aggression analysis to confirm that there is nothing like gender bias, hiring bias out of the salary ranges. I received data a couple weeks ago indicating there are people included that have not worked here for three years and faculty members with

incorrect ranks, incorrect salaries and there is no information about who has a sabbatical salary and who doesn't. It is a mess. We have requested a data set from Human Resources and again we have not heard back yet. When that comes then I will continue the research.

If you look at the current CUPA data received a couple weeks ago, we can actually calculate what the ranges should be and then calculate the difference between what OIT currently has after our COLA adjustment versus what those ranges should be. For example Communication CIP code nine, says the range should be \$49,000 to \$63,000 at an assistant professor level with a CUPA average of \$56,031. At OIT after the COLA adjustments, we would be \$945 above. According to the MGT comparators, is that Communication and Engineering, reporting under our CIP code 14 and Engineering Technology would technically all be in the positive over the expected value and then the remaining departments are all in the negative between a couple hundred and several thousand dollars against the MGT comparators. Partially and due to the fact that nationally the rates of pay for faculty have beat out the inflation rates if we match the inflation rates with our 2% COLA. We are a little behind for many departments according to that comparison. Using the OUS is significant, for example; Mathematics is over \$6000 behind at the assistant professor level and Natural Sciences is almost \$5000 behind at that level and there is no information on Engineering Technology. The only department in any of our list of comparators from OUS system that reports Engineering Technology is one Electrical Engineering program and they do not have any sufficient associate professor or professors to report to CUPA. That is one of the reasons we asked them to expand the list with the MGT studies. The only departments that report under 14 are CSET, Manufacturing, and Mechanical Engineering departments. Mechanical and Manufacturing have over 70% of their students are actually in Engineering not in Engineering Technology and that is currently going through their pipeline to be changed. I think it has been in the works for five years and they have not heard a response yet.

End of Report

Reports of Special or Ad Hoc Committee

- Matt Frye – From the ad hoc committee on teaching evaluations, we have done two things, we have gathered up some literature on the topic. One of our charges is specifically to look at bias and to consider how well teaching evaluations engage effectiveness. Therefore, we have put that altogether, however, we have not written anything up this time. We have three steps to accomplish before people start talking about it in more depth. Two of them are feasible which the literature review is and then we have started to interview a number of faculty, 24 faculty so far. We are going to have all of our interviews transcribed and written down, bring them together, and start going through them. Therefore, this is a qualitative research to see if we have hit saturation yet, I do not think we have yet. I think we will have to do a few more interviews so if anyone wants to talk about these things please let me know, we are trying to get parity between departments. We are breaking it up by buildings so I have had a lot more interest from some departments than others, so we are going to reach out to those who have not necessarily express their interests.

End of Report

Unfinished Business

No Report

New Business

- Terry Torres – I have new business and this has to do with academic rank and tenure-track for unclassified administrators, this is OIT 20-301. What this policy does is unclassified administrators may be hired with or without academic rank within the next sentence says, “OIT does not grant tenure to nonteaching administrators”; however, we have not been following this at all. It has come to my attention that this will not be followed and it is in some way causing some contention. I would like to make the motion that we retire this policy since we are not using this in practice. Motion passes

Open Floor Period

- Elvira Schechtel announced that the Faculty Advisory Committee on Emeritus Status recommend that Leanne Maupin and Joe Stuart be granted emeritus status. Ballots were distributed and both were recommended for status by Senate.

Report of the Provost – Gary Kuleck

- No Report

Report of the President’s Council Delegate – Terri Torres

- No Report

Report of the Association of Oregon Faculty (AOF) Representative – Matthew Sleep

- No Report

Report of the Interinstitutional Faculty Senate (IFS) Representative – Mark Clark

- No Report

Report of the Fiscal Operations Advisory Council (FOAC) Representative – Matthew Sleep

- Update-two major items discussed, we are still waiting on the state to come up with money and still waiting on a budget. There was an update on the financials of OMIC from Craig Campbell. OMIC is a stand-alone entity of the university. We put forward about \$2 million to purchase that building and if OMIC stays around for 10 years we get that building free and clear. OMIC is operating on state funds, grants, budgets, and from the money generated by companies and educational partners paying dues to OMIC to be a part of the enterprise. In addition, all OMIC employees are from Oregon Tech. OMIC pays about \$146,000 back to Oregon Tech to cover all of the overhead. They talked about 12 projects they are working on specific to the manufacturing industry which is what OMIC is. As of right now, we know that OMIC is operating separately and there is money coming in the general fund for Oregon Tech, but at this time the budget process is still unknown.
- Every year the Oregon University system asks additional money from the state to cover increased costs. This year the Oregon University system asked for \$120 million in the initial response from the Governor’s office was no increase. So, zero dollars, but then it got to \$40 million and we are

still waiting to hear where that ends up. We are also concerned about losing the sports lottery money that we get, also some of the engineering tech funds that we get. These are additional funds because we provide Engineering Technology degrees.

- FOAC as a group went through all of the budget requests for next year so next year all of the departments will put forward their budgets. Overall, there was an additional \$6 million estimated in budgets for next year.
 - I want to reiterate that I attended the student forum on the tuition recommendation. OIT students were presented with three alternatives at a seven, nine, and 15 percent increase in tuition. The tuition recommendation committee voted on the 9% but that still has to go through the President's budget. The President has not come out with his budget at this point and of course, we are still waiting on the state. One other thing I like to mention is that we are not alone; this is all Oregon universities going forward through the same type of issues.
- End of Report

Report of the Administrative Council Delegate – Lindsey Davis

- The Administrative Council plans to invite Dr. Naganathan to meet and discuss performance evaluation concerns brought up last month. Specifically, there is a concern that performance evaluations might affect merit pay.
 - They also plan to get a better perception of the Administrative Council's place with shared governance so we can more effectively support the administration on campus.
 - Lastly is we voted on emeritus status for two retiring administrators.
- End of Report

Adjournment

Terri Torres adjourned the meeting at 8:30 PM.

Respectfully submitted,
Don McDonnell, Secretary
/sb

ADDENDUM

Table 1: Asst. Professor Salary Ranges by CIP Code from 2017 MGT Study and published by the administration BEFORE adjustment for Benefits at -3,359.58

Subject	CIP	2017 MGT		
		12.5% Below CUPA Average	Cupa Average	12.5% Above CUPA AVERAGE
Communication	9	47918.5	54764	61609.5
Engineering	14	67407.375	77037	86666.625
Engineering Technology	15	58880.5	67292	75703.5
Biological (Natural) Sciences	26	49255.5	56292	63328.5
Mathematics	27	50141	57304	64467
Psychology (HSS)	42	47949.125	54799	61648.875
Allied Health Fields	51	55160.875	63041	70921.125
Management	52	81141.375	92733	104324.625

Table 2: Current Salary Ranges at the Asst. Prof. Level calculated by 2% mid year COLA adjustments from previous 2 years

Subject	CIP	2019 With COLA Adjustments		
		12.5% Below Average	Estimated Cupa Average	12.5% Above AVERAGE
Communication	9	49854.4074	56976.4656	64098.5238
Engineering	14	70130.63295	80149.2948	90167.95665
Engineering Technology	15	61259.2722	70010.5968	78761.9214
Biological (Natural) Sciences	26	51245.4222	58566.1968	65886.9714
Mathematics	27	52166.6964	59619.0816	67071.4668
Psychology (HSS)	42	49886.26965	57012.8796	64139.48955
Allied Health Fields	51	57389.37435	65587.8564	73786.33845
Management	52	84419.48655	96479.4132	108539.3399

Table 3: Asst Prof 2019 CUPA report with MGT Comparators *OIT Difference calculated: COLA – CUPA (Positive means OIT is higher)

		2019 CUPA with MGT Comparators			
Subject	CIP	12.5% Below CUPA Average	CUPA Average	12.5% Above CUPA AVERAGE	OIT Difference
Communication	9	49027.125	56031	63034.875	945.4656
Engineering	14	69135.5	79012	88888.5	1137.2948
Engineering Technology	15	60686.5	69356	78025.5	654.5968
Biological (Natural) Sciences	26	51804.375	59205	66605.625	-638.8032
Mathematics	27	52353	59832	67311	-212.9184
Psychology (HSS)	42	51907.625	59323	66738.375	-2310.1204
Allied Health Fields	51	59588.375	68101	76613.625	-2513.1436
Management	52	85512	97728	109944	-1248.5868

Table 4: Asst Prof 2019 CUPA report with OUS Approved Comparators (including additional 6 approved in 2010)

		2019 CUPA with OUS Approved Comparators			
Subject	CIP	12.5% Below CUPA Average	CUPA Average	12.5% Above CUPA AVERAGE	*OIT Difference
Communication	9	48821.5	55796	62770.5	1180.4656
Engineering	14	71113.875	81273	91432.125	-2261
Engineering Technology	15				NA
Biological (Natural) Sciences	26	56034.125	64039	72043.875	-4834
Mathematics	27	57604.75	65834	74063.25	-6002
Psychology (HSS)	42	52796.625	60339	67881.375	-1016
Allied Health Fields	51	61910.625	70755	79599.375	-2654
Management	52	87666.25	100190	112713.75	-2462

Table 5: Salary Ranges based on +/- 12.5% margins calculated from MGT 2017 report with COLA Adjustments (without the benefits differential being removed)

Subject	CIP	COLA Adjusted Minimums			Adjusted Maximums		
		Assistant	Associate	Full	Assistant	Associate	Full
Communication	9	49886.74	58776.96	73712.94	64139.88	75570.13	94773.47
Engineering	14	70130.85	77547.86	95525.97	90167.93	99704.06	122818.7
Engineering Technology	15	60947.24	69998.72	80365.26	78360.47	89998.05	103326.4
Biological (Natural) Sciences	26	51245.51	60174.22	76299.38	65886.86	77366.59	98098.87
Mathematics	27	52167.3	58872.68	74035.47	67072.02	75693.19	95188.14
Psychology (HSS)	42	49886.74	58776.96	73712.94	64139.88	75570.13	94773.47
Allied Health Fields	51	57390.11	66851.51	81643.91	73787.04	85951.65	104970.4
Management	52	70130.85	77547.86	95525.97	90167.93	99704.06	122818.7

Table 6: Salary Ranges based on +/- 12.5% margins calculated from 2019 CUPA Data with OUS + 6 Comparators

Subject	CIP	CUPA with MGT Minimum			Adjusted Maximums		
		Assistant	Associate	Full	Assistant	Associate	Full
Communication	9	48821.5	59449.25	67491.38	62770.29	76434.5	86774.34
Engineering	14	71113.88	78550.5	100227.8	91431.82	100993.2	128863.8
Engineering Technology	15			82318.25			105837.4
Biological (Natural) Sciences	26	56034.13	64806	79911.13	72043.63	83321.72	102742.5
Mathematics	27	57604.75	61022.5	78176.88	74063	78457.24	100512.8
Psychology (HSS)	42	52796.63	61054	75698	67881.15	78497.74	97325.68
Allied Health Fields	51	61910.63	70140.88	87850	79599.11	90180.82	112949.6
Management	52	87666.25	88198.25	102292.8	112713.4	113397.4	131518.8

Table 7: Salary Ranges based on +/- 12.5% margins calculated from 2019 CUPA Data with MGT Comparators

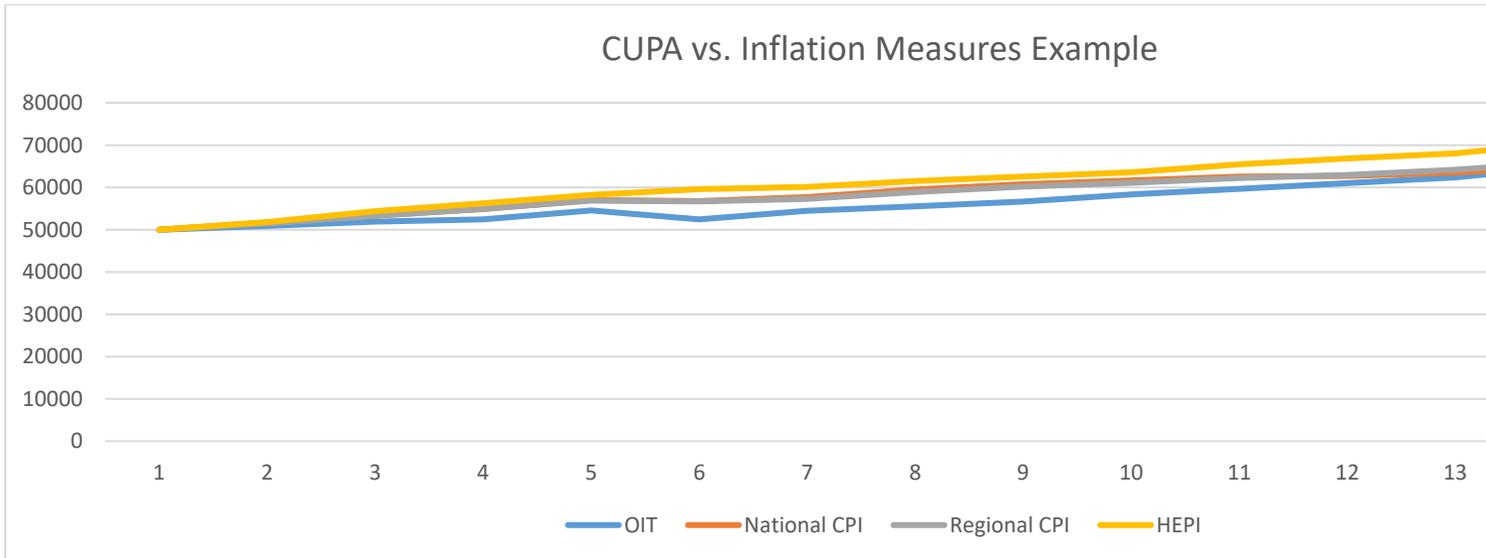
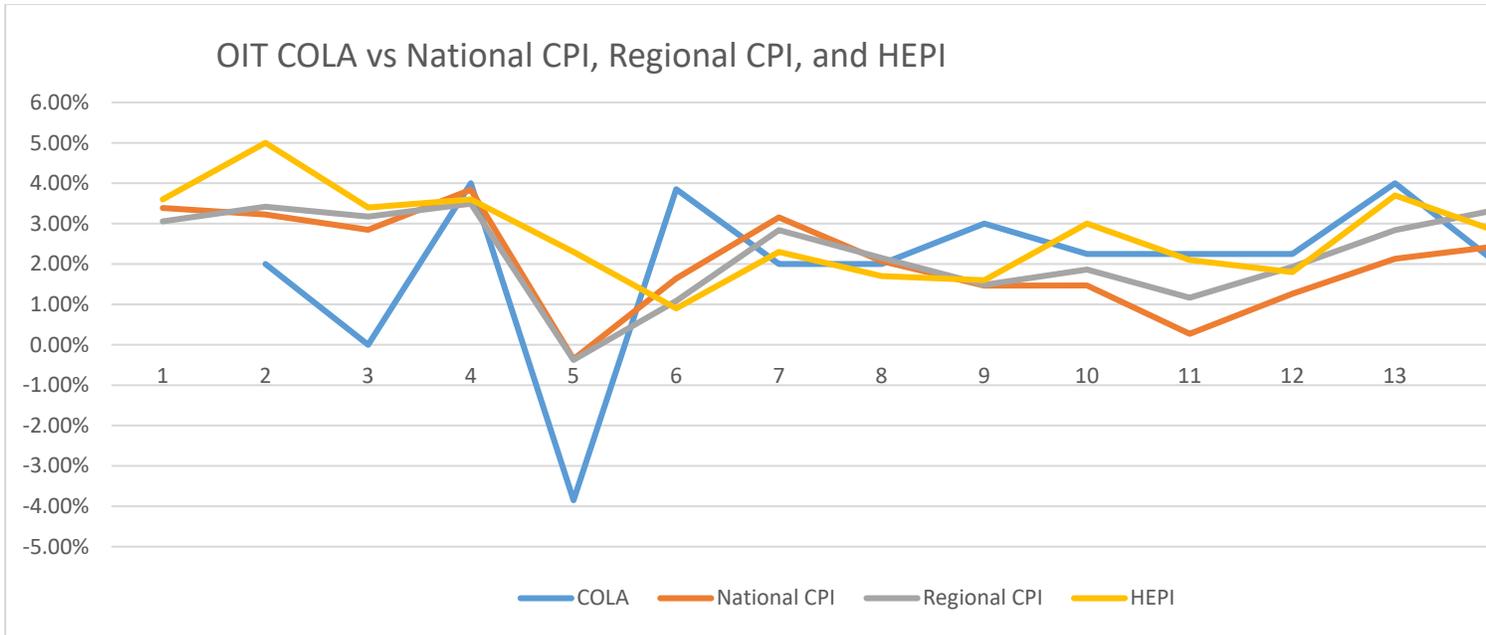
Subject	CIP	CUPA with OUS List Minimums			Adjusted Maximums		
		Assistant	Associate	Full	Assistant	Associate	Full
Communication	9	49027.13	59008.25	71788.5	63034.66	75867.5	92299.19
Engineering	14	69135.5	76758.5	95550	88888.2	98689.17	122849.6
Engineering Technology	15	60686.5	67441.5	81380.25	78025.24	86710.21	104631.4
Biological (Natural) Sciences	26	51804.38	60321.63	74739.88	66605.4	77556.12	96093.8
Mathematics	27	52353	58023.88	73371.38	67310.78	74601.88	94334.31
Psychology (HSS)	42	51907.63	59857.88	74266.5	66738.15	76959.87	95485.18
Allied Health Fields	51	59588.38	69855.63	81823	76613.37	89814.08	105200.6
Management	52	85512	89621.88	98961.63	109943.6	115227.7	127236

For purposes of calculation (due to historical precedent on equity in salary), the agreement has been that the lowest salary would be set to the second lowest category and the highest would be set to the second highest.

In this iteration, it would indicate that CIP 09 would be calculated under CIP 26 and CIP 52 would be calculated under CIP 14

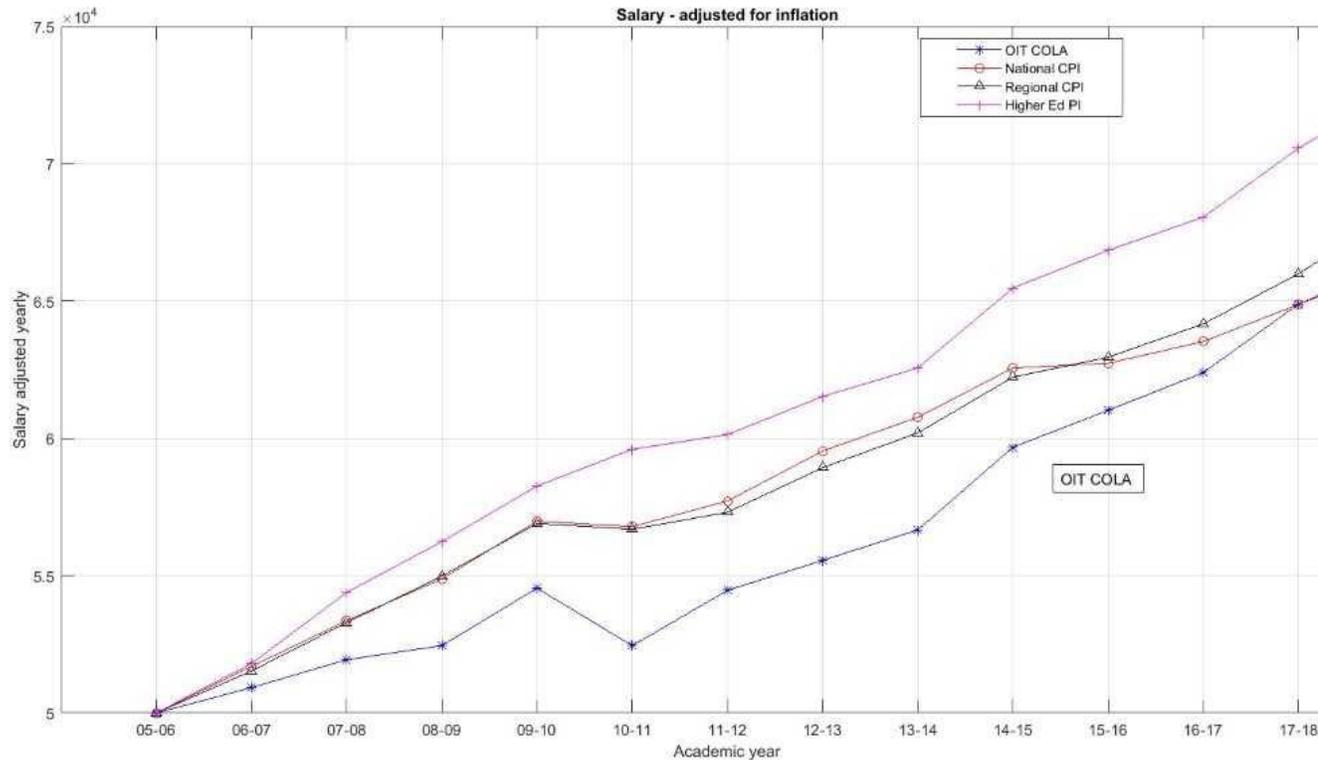
Academic Year	COLA	National CPI	Regional CPI	HEPI	OIT	National CPI	Regional CPI	HEPI
2005-06		0.03388036	0.030569948	0.036	50000	50000	50000	50000
2006-07	2.00%	0.032258065	0.034188034	0.05	50922	51694.018	51528.49741	51800
2007-08	0.98% or 2%	0.028482143	0.03174526	0.034	51940.44	53361.56697	53290.15544	54390
2008-09	4.00%	0.038395501	0.034943222	0.036	52449.46	54881.41874	54981.86528	56239.2
2009-10	-3.85%	-0.00355778	-	0.023	54547.43	56988.61832	56903.10881	58263.87
2010-11	3.85%	0.016402765	0.01088099	0.009	52447.36	56785.86554	56689.63731	59603.94
2011-12	2.00%	0.031565286	0.028399253	0.023	54466.58	57717.31075	57306.47668	60140.37
2012-13	2.00%	0.020694499	0.021500319	0.017	55555.91	59539.17417	58933.93782	61523.60
2013-14	3.00%	0.014647595	0.014838021	0.016	56667.03	60771.30757	60201.03627	62569.50
2013-14 2	2.25%	0.014666226	0.018619818	0.03	58367.04	61661.46109	61094.30052	63570.62
2014-15	2.25%	0.002721962	0.011656225	0.021	59680.3	62565.80201	62231.86528	65477.73
2015-16	2.25%	0.012619348	0.01929922	0.018	61023.11	62736.10376	62957.25389	66852.77
2016-17	4.00%	0.02129929	0.028392644	0.037	62396.13	63527.79248	64172.27979	68056.12
2017-18	2.00%	0.024424772	0.033465757	0.028	64891.97	64880.88936	65994.30052	70574.19
2018-19	2.00%	0.012325423	0.049065003		66189.81	66465.59026	68202.84974	72550.27

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OIT Salary Adjusted for COLA when compared to actual inflation rates.

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Notes:

- 1.) HEPI is the higher education price index.
- 2.) While the result appears that our value now is equivalent in purchasing power to 2005, the losses in salary and retirement over the years are summative. The area between the curves would represent the total loss in purchasing power from salary alone. For example, this faculty member would have lost a total of \$32,032.34 over the 13 year period when compared to the National CPI.
- 3.) This graph does not represent total compensation including OPE, only salary so it may be misleading.

Total Benefits adjustment Explanation

Exhibit 2-9 from MGT Report

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INSTITUTION	PERCENTAGE OF PAYROLL FOR BENEFITS COSTS	GEOGRAPGIC LOCATION
OREGON INSTITUTE OF TECHNOLOGY	39.29%	
UNIVERSITY OF SOUTH CAROLINA- AIKEN	24.92%	South Carolina
YOUNGSTOWN STATE UNIVERSITY	33.00%	Ohio
CENTRAL CONNECTICUT STATE UNIVERSITY*	54.63%	Connecticut
MARSHALL UNIVERSITY	29.70%	West Virginia
WESTERN OREGON UNIVERSITY	30.00%	Oregon
WESTERN CAROLINA UNIVERSITY	32.00%	North Carolina
KEENE STATE COLLEGE	39.00%	New Hampshire
FLORIDA GULF COAST UNIVERSITY	32.00%	Florida
AVERAGE:	34.41%	

Based on this data (and the BLS calculation of 33% average), an adjustment amount of 3359.58 was calculated.

Arguments against this calculation based on the data provided:

- 1.) The standardized score for our benefits percentage is $(39.29-34.41)/8.63433 = 0.56519$ standard deviations away from the mean based on this data. This is WELL within a reasonable distance.
- 2.) MGT recommended utilizing the CUPA Benefits Survey to conduct a more detailed research with our comparators. This has not been done.