



December 6, 2011

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Dear Student Success Task Force members:

Subject: Academic Senate Response to the December 1, 2011 Recommendations

On behalf of the faculty across the state, I thank you for the efforts you have made to develop a workable plan to increase student success in our colleges. As you are aware, faculty at our colleges have primary responsibility for academic and professional matters by way of their local academic senates. As the recommendations directly impact areas where academic senates have primacy and faculty will necessarily be involved in the implementation of all aspects of the recommendations, the Academic Senate for California Community Colleges has opted to not directly address the various draft versions of the recommendations until now. I applaud the responsiveness of the task force to the field and appreciate many of the changes that have been made. As the version of the recommendations dated December 1, 2011, is likely to be the last draft version released in time for public comment, it is prudent for our organization to address the recommendations directly and explicitly at this time.

The current version of the recommendations is an improvement over the prior version in numerous ways, but it has been modified in ways that create new concerns. At November's Consultation Council meeting, it was stated that there would be five major changes in addition to a review of the document for "tone". The recommendation to consolidate categorical funds was to be deleted, the proposal to limit noncredit funding to career development or college preparatory (CDCP) courses was to be modified, students would not be required to pay "full freight" for courses not in their educational plans, ESL would be separated from basic skills, and there would be some modification of recommendation 8.3 that proposed an "alternative funding model for basic skills." As an attendee at the meeting where these changes were agreed upon, I felt confident as to what most of the changes would be. My only remaining concerns regarded what would happen to noncredit and recommendation 8.3.

Upon receipt of the December 1 version, I was pleased to find the funding of noncredit programs unaltered and then alarmed to find a proposal to add a new noncredit category to permit student success courses to be offered as noncredit. To my knowledge, no such proposal had ever been discussed by the task force members, and there are many reasons to argue against this change. I am hopeful that the task force members will discuss this and make appropriate modifications.

Recommendation 8.3 remains unclear. It still appears to be a form of performance-based funding, in contradiction with the commitment not to implement performance-based funding. The language is vague, but it clearly serves to incentivize one form of improvement – moving students through courses more quickly. Such a focus on one approach also contradicts the position stated in task force meetings that no single, specific proposal for revising basic skills instruction would be promoted. In considering basic skills instruction, there are two outcome measures that would reflect greater success, as well as cost-savings to the state. Moving students through sequences of levels in a shorter period of time appears to be the focus of 8.3. But improving the success of students in individual courses would also

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be a means of increasing success and should be equally incentivized. If the purpose of 8.3 is to provide funds to permit innovations aimed at either of these goals, the Academic Senate would be able to support this recommendation. But if these are funds contingent on achieving a stated goal, then this is merely performance-based funding. More analysis of this recommendation is provided later.

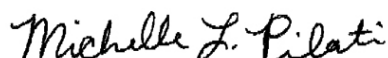
The tone of the current document is much-improved, a change that I am confident everyone in the field appreciates. The explicit reference to the need to hire more full-time faculty is also a welcome addition. The changes made to Chapter 6, however, were not sufficient. And it remains unclear what is meant by “mandatory professional development opportunities” (p. 5). While the intent to ensure that FLEX time is appropriately dedicated to professional development is appropriate, the means of accomplishing this are not clear and are overly intrusive. Please find more discussion of this later.

I appreciate the complexity of this process and that statements may be made by task force members that are left open to interpretation by those charged with revising the language of the recommendations. This is all the more reason to find a way to allow the Student Success Task Force (SSTF) to respond to what is to be the final version of the recommendations prior to its final consideration for adoption. If the Board of Governors were to schedule a special meeting in February, the document could be given the standard two readings prior to adoption. As it now stands, the January meeting may very well serve as a forum where SSTF members have to publicly take issue with elements in the final document. This would serve no one well. I sincerely believe that there is the potential to have a final document that the system can provide qualified support for. But this is unlikely to be the case if the recommendations are pushed forward without appropriate review by those who are supposed to have developed them. A document never reviewed in its final form by the committee charged with its development should not move forward for adoption by another body.

As other constituency groups have emphasized concerns about the timeline, I will not belabor the point here. It is, however, troubling that there will be no opportunity for public comment on the version that will be seen by the Board of Governors in January prior to that meeting. I worry that other unauthorized changes may be made between the Student Success Task Force’s December meeting and the January Board of Governor’s meeting.

Again, thank you for all your efforts and for taking the time to consider the points made here. Please find comments on selected recommendations in the enclosure. While we have considerable feedback to offer related to implementation, an attempt has been made to limit comments here to addressing the language of the recommendations.

Sincerely,



Michelle L. Pilati, Ph.D.
President, Academic Senate for California Community Colleges

Enclosure

**Academic Senate for California Community Colleges
Comments on SSTF December 1, 2011 Recommendations**

Recommendation 1.1

It is unclear why this recommendation is necessary and some of its language may be factually incorrect. The Common Core State Standards and their measurement are not something that will be done at the state level. California is part of a consortium engaged in these efforts. The role of the community college in any “development” is unclear. It should be noted that any “alignment” must involve the raising of high school exit standards to be consistent with what college-ready means to all components of higher education. An explicit statement to this effect would ease concerns about the true meaning of this recommendation and make the recommendation stronger.

Recommendation 2.1

It is unclear why a community college placement test should be aligned with K-12 assessments. If the references to K-12 are intended to promote the development of an EAP-like system within the CCSS assessments, that appears logical. If colleges who wish to continue to use an alternative assessment (and pay for it) are forced to use a common assessment, a justification should be provided for this. As the funds that support provision of an assessment are not line item dollars (i.e., these are not dollars that can be withheld to fund a central common assessment), it is not clear what would be gained by mandating a central assessment. Requiring the colleges *honor* that central assessment would prevent the re-testing of students and address that criticism of the current system.

Recommendations 2.2 and 2.3

As noted, these recommendations require resources. Implementation must involve a careful consideration of how colleges will provide these services.

Recommendation 2.4

It is unclear where the recommendation to make student success courses noncredit came from.

Recommendation 2.5

While it is always desirable for students to identify a course of study, forcing them to do so does not ensure the same correlation observed in the referenced research. Students who opt to declare a goal and who are both able to and choose to engage in full-time studies are likely to be more successful because of the factors that allowed them to make these choices. It is not clear that there is a benefit to forcing choices on students who are not ready to make them – and certainly no rationale to support the added complexity of tracking students as proposed in this recommendation. Requiring a student to declare a program of study at the end of his or her second term could mean forcing a student to make a decision after having taken only two courses. This recommendation fails to consider the course-taking patterns of California community college students. As constructed, this recommendation would dramatically increase demands on the system. Deadlines for action should be student unit accumulation, not terms completed. Alternatively, colleges could be given the option of implementing a deadline based on either terms or units completed.

Recommendation 3.1

The Academic Senate opposes this recommendation until it has been determined that the proposed enrollment priorities will not have a negative disproportionate impact. As the SSTF most certainly shares this concern, we would encourage the addition of some statement that explicitly indicates sensitivity to this and recognizes the need to consider the impact of implementation before doing so.

Relevant Academic Senate Resolutions:

13.11 F11 Student Success Task Force Recommendations: Priority Enrollment: Request that recommendation 3.1 of the SSTF not move forward until the potential impact on traditionally underserved and under-performing populations has been thoroughly researched and it has been determined that there will be no disproportionate negative impact on these populations.

13.14 F11 Earned-Unit Limitations for Registration Priority Concerns: “urge colleges and policy-makers to ensure that community college students who are legitimately engaged in programs or coursework appropriate to the California community college mission are able to maintain registration priority without undue burden”.

Recommendation 3.2

Changes to BOG Fee waivers should be implemented as a means of improving student success, not as a means of saving money. As noted, there are costs associated with the additional monitoring and the provision of “a series of active interventions to ensure that students facing difficulties do not lose financial aid eligibility.”

Recommendation 3.4

As noted, the implementation of appropriate prerequisites will ultimately create pressure to begin remediation early. Due to the complexity of re-working the balance of transfer and basic skills courses, colleges must be permitted to move towards the goal established by this recommendation on their own timelines. Given the diversity of our students and the differences between colleges, forcing this to happen by a specified deadline would be unwise.

Recommendation 4.1

Despite discussions amongst task force members regarding this concern, the language would still hinder colleges wanting to introduce new courses or programs. It is not clear how course status as supporting a student education plan would be monitored.

Chapter 6

This section needs to be re-written. While the state has a vested interest in the appropriate use of FLEX time and any professional development dollars provided to the colleges, neither the Board of Governors nor the Chancellor’s Office should be tasked with directing professional development activities. This is not their purview or their function. The minimal changes that have been made do not address the concerns expressed at the Academic Senate’s Fall Plenary. While the true intent of this recommendation may simply be to provide measures to ensure the appropriate use of FLEX time, it is not clear why this would require changes to Education Code and Title 5 – as are referenced in 6/7 indicated “requirements for implementation.” There is no need to modify Title 5 to include part-time faculty as ALL faculty are included in the current language.

Chapter 7

It is not clear how this chapter relates to student success. A stronger Chancellor’s Office suggests a lack of local authority – potentially resulting in interference with the ability of local colleges to address the needs of local populations.

Recommendation 8.3

As noted earlier, it is not clear what this recommendation is proposing. Regular FTES funding can (and is) currently used to pilot innovative ways of delivering basic skills instruction. (Bullet 1)

Bullet 2 appears to be inconsistent with Bullet 1. Why would there be a need to amend statute and the annual Budget Act to allocate funds when regular FTES funding would be used? If this proposal is to fund pilots at a different per FTEs rate, that is not clear.

Bullet 3 is even more perplexing. Why would an exemption from attendance rules be required? The confusing elements in this recommendation lead one to hypothesize that this is, in reality, unchanged from the prior 8.3 performance-based funding proposal. It appears that the only difference is the limitation to a “pilot”.