June 1, 2011

Dear Jane and Michelle,

I am writing on behalf of the Academic Senate of City College of San Francisco asking you to submit a request for Consultation Council to review the proposed changes to Title 5 regarding repetition for substandard grades and repetition to build competency at its June 16, 2011 meeting. We are hoping that not only will Consultation Council revisit the issue, but that the Board of Governors will consider the July meeting as a time for further testimony rather than action. We are asking for reconsideration because: 1) there were some serious flaws in the documents presented at the May Board of Governors meeting; 2) critical information was omitted from consideration at that meeting; and 3) lumping together of repetition for substandard grades with repetition to build competency has caused confusion:

1) The documents presented at the May Board of Governors meeting for Item 3.2 “Proposed Title 5 Changes on Apportionment Limit for Enrollment in Credit Courses (Sections 55024, 55040, 55042, 58161, and 58161.5)” contained several numerical charts with mathematical errors that were substantively misleading. For example, in the chart for students taking English for the 4th time, the pass rate was calculated by taking the number of students passing and dividing by the number of enrollments instead of by the number of students taking the course. Of the 14,171 student who signed up for the class on the fourth time, 80% of them passed – a substantial success rate, but the chart shows only 20% in that box because it compares the number passing on the fourth take with the total number of enrollments, a method that guaranteed that the “pass rate” could not be greater than 25%, because the number of students was multiplied by the four times they enrolled. This is only one of the significant mathematical errors contained in the charts used to justify the change in Title 5 regulations regarding repetition. It is quite clear that these charts need to be fully vetted, understood, recalculated, and the proposed Title 5 changes reconsidered in light of the new data presented in a straightforward way.

2) At a recent presentation to faculty, students, and administration at City College of San Francisco, representatives of the State Chancellor’s Office stated that there had been no research conducted to find out why students are attending for the fourth or more time. City College has conducted research on this issue that it is more than willing to share and discuss. Furthermore,
at the meeting, one of our Deans, a Marine Corp veteran, talked specifically about the role PTSD plays in causing our veteran students to withdraw from classes during their attempts to complete their college education. Although this is anecdotal information on this particular issue facing students who have served this country, we think that a discussion of the available research as to why students repeat courses needs to be conducted and analyzed before the Title 5 regulations are proposed, much less adopted. We would welcome the opportunity to share the research we have completed with the Council as well as other broad-based data as to why some of our students need the additional opportunities that repetition provides.

3) Lumping together a) repetition for substandard grades in English, math, and ESL and b) repetition to build competency and expertise in one set of proposed changes to Title 5 regulations has led to significant confusion as to their effect and which courses are being affected. To clarify, in the first group, students are repeating because they have received a grade of D, F or NP, while in the second group, the students have received grades of A, B, C, or P. This confusion has been exacerbated by the numerical charts which combine both types in the same chart, which cannot be clearly interpreted as to impact of the proposed regulatory change. Since policy discussion as to the reasons for repeating what are called activity courses, i.e. courses of the second category that are repeated to gain and maintain competency and expertise are not slated to take place until later in this year, it would be premature to put Title 5 regulations into place that could negatively affect this group and limit their ability to succeed. We should have the policy discussion about repeatability in activity courses BEFORE the blanket policy to limit all repetitions is put into place.

We believe that there is no urgency to these proposed Title 5 regulations. Rather than proceed to a decision based on misleading, confusing and incomplete data, it would be much better to take the opportunity for reasoned discourse about the size of the problem the full implications for and impact on students. The small delay caused by reconsideration is well worth the prevention of unintended negative consequences.

Thank you for your consideration of this issue. I would be very glad to talk about it further at any time. My cell phone number is 415-860-4173. We hope that you will request that these proposed changes to Title 5 be put back on the June 16, 2011 Consultation Council agenda for discussion.

Sincerely,

Karen Saginor
Karen Saginor
CCSF Academic Senate President