

Community College Association (CCA) (CTA) (NEA)

Feedback Regarding

The California Community Colleges Student Success Task Force Recommendations

Dear Task Force,

CCA would like to thank you for all the hard work put into this document. We understand the hours of discussion and research that took place. We appreciate the efforts of all members of the task force. The Community College Association finds eight (8) overriding initial concerns with the content of the 22 recommendations outlined in your publication dated October 2011.

1. It appears that the Board of Governors (BOG) would become an overriding agency with similar powers and directive capability similar to those of the University of California Regents.
2. The recommendations outline a program that if initiated, would place the California Community Colleges Chancellor's Office with similar powers that the California State University Chancellor's Office maintains, as it would relate to the 112 community colleges within the system. The CSU system has one collective bargaining contract. The California community colleges have at least 72 different collective bargaining contracts. Both faculty and students are not supportive of the outcomes that have been secured with the CSU Chancellor's Office.
3. If the 22 recommendations were to be finalized, Prop 98 funds would be redistributed in a manner inconsistent with current law and damaging for students. Funding decision mandates would be taken away from faculty and students and replaced by those exclusively decided by the BOG, Local administration, and the Chancellor's Office.
4. A program designed to provide additional power to both the BOG and the Chancellor's Office would take autonomy away from the local districts and their Boards of Trustees. This would be a fundamental shift away from the Master Plan for Higher Education in California. This would significantly alter the California Community College Mission Statement and it would betray the concept of local control.
5. There is no consistent and dedicated enforcement mechanism established to make the recommendations feasible.
6. There is no clear source identified for the substantial increase in funding which would be needed to implement these recommendations. There is a hope that the legislators would provide additional funding, but in these hard economic times, it seems nearly impossible.
7. A highly volatile definition of "student success" as defined by this group does not meet the same definition that many within the community colleges believe to be the most acceptable.
8. A temporary economic downturn has allowed for a response that significantly changes the role or core mission of the community college by losing community services and lifelong learning.

In the following, we highlight specific concerns that must be addressed in our view:

Page 10: CCA appreciates that under Report Recommendations, the Task Force acknowledges that “several (recommendations) will be subject to collective bargaining.” **CCA believes that any recommendation that is subject to collective bargaining should be noted as such in the Report, so as to alert both faculty and administration that implementation is not automatic.**

Page 11: under Defining Student Success, “Most students come to community colleges with one thing in mind: earning a degree or certificate and then getting a job.” **CCA would like to see the statistical support for this claim. Many students transfer to a four year institutions without earning a degree from a community college. If the Student Success Outcome Metrics are based on this assumption, results will be inaccurate. Important statistical questions need to be asked for internal discussion and review before the final plan is adopted.**

Page 13 states under Implementation Processes, “The community college system has a rich history of shared governance and local collective bargaining; nothing in this report is designed to upend those processes.” **CCA believes this statement contradicts the page 10 statement identified above. It is also relevant for discussion purposes that there was no person designated to participate in this task force from either CTA or CFT.**

Page 14 states under the Conclusion regarding the “funders” of the project, the following foundations were mentioned, “The William and Flora Hewlett Foundation, The James Irvine Foundation, The Walter S. Johnson Foundation, The Lumina Foundation, and the David and Lucile Packard Foundation.” **CCA believes it to be confusing that the private funders wanting to either privatize higher education or radically change public education were the partners funding this project.**

Page 15 states the student readiness challenge facing community colleges, “In the CCCs, 70-90 percent of first time students require remediation in English, math, or both.” **CCA believes what this means is that only 10-30 percent of first time students are college ready when entering the California Community College System. It appears to CCA this issue must be the driving force for educating our students. If a student cannot read or does not know basic math tools, he/she cannot succeed. We need to invest in a program that will allow for more faculty, smaller classes, and paid office hours for part-time faculty (so all faculty have the opportunity) to meet with students outside class.**

Page 17 states under Recommendation 1.1, “The Task Force recommends that the community college system closely collaborate with the SBE and Superintendent of Public instruction to define standards for college and career readiness as California implements the K-12 Common Core State Standards.” **CCA believes that participation in a program like this as stated in the recommendations is completely voluntary and has no consequences if K-12 does not participate.**

Page 20 states, “Student to counselor ratios range from 800 to 1 to 1,000 to 1 in the community colleges.” **CCA believes this statement indicates how deficient the community colleges are in their hiring of counseling faculty. If all agree this is a major need in gaining additional student success, CCA recommends that the Chancellor’s Office and Administrators within the 112 community colleges support increasing the 50% law to 58% and adding Counseling faculty. It is time to stop saying it is important for students to have access to a counselor and not be willing to hire more faculty.**

Page 21 states, “By lifting these costs from the local districts and freeing up local monies, centralized technology Will allow for opportunities to drive down cost by bulk purchasing and development.” **CCA believes with the limited amount of funding local district will experience in the short term, funding cuts with an emphasis to funding needs at the Chancellor’s Office is inadvisable.**

Page 22 states, “The centralized assessment must be diagnostic to ensure placement into appropriate coursework and inform faculty efforts to design appropriate curriculum.” **CCA believes this is a question of fundamental validity of testing. How does one assessment instrument become the most cost effective and how does it ensure correct placement? Also, if faculty members are asked to design appropriate curriculum, CCA affirms the position that faculty members should be compensated for such work outside the classroom per collective bargaining rights.**

Page 22 states, “Participation in the interim system would be voluntary but incentivized by the significant local cost savings.” **CCA believes that if a system is truly voluntary it cannot be mandated. CCA believes that economy of scale does not always fit the demands of certain types of student populations when it comes to a standardized assessment instrument.**

Page 24 states, “the Chancellor’s Office would create applications that would be plugged into existing college and district web portals. (A common application to college; An electronic transcript; An online BOG fee waiver form; A degree planning module; An electronic library resource and library catalog; A career exploration module; A job placement module; A textbook purchasing module; and A transfer advisement module.) **CCA believes these applications have the capability of being offered at this time and does not need any approval. Provide what exists now and bring on other parts as they are developed. Perhaps individual college technology people have constructed applications that can be used.**

Page 32 states regarding recommended BOG fee waivers, “Implementation of this recommendation will result in substantial cost savings to the community college system (estimated to be approximately \$89 million.) **CCA believes this amount would pay for the estimated \$12 million applications web portals program with money left over to be redistributed to the Districts. CCA believes these additional funds would be unrestricted funds and subject to collective bargaining.**

Page 35 states, “Colleges need to be able to offer students an array of course, laboratory, or other approaches to skill improvement. **CCA believes these are changes in working conditions and would be subject to collective bargaining agreements.**

Page 35 states under Requirements for Implementation, “Title 5...already require students assessed below collegiate level to begin remediation in their first year by following the procedures-to establish prerequisites or co-requisites.” **CCA believes these are only suggestions. Students have the right to opt out of such requests.**

Page 37 states under Fund courses based on their inclusion in student educational plans, “The Board of Governors and the legislature should ensure that state subsidization for instruction, whether it be credit or noncredit courses, is limited to those courses that are included in a program of study and informed by a student education plan....targeting the state apportionment funding to support courses that are necessary to meet students’ specific educational objectives will ensure that finite resources are used to meet high priority educational objectives in CTE, transfer, and basic skills. “ **CCA believes the moment one states the legislature should do anything with state subsidization it is asking for realignment of Prop 98 funds. CCA also believes any transfer of these funds directing how they are spent is subject to collective bargaining. CCA also believes such a maneuver would weaken the 50% law that specifies these funds be spent on faculty and students within the classroom and not for administrative type of activities.**

Page 38 states regarding amending Title 5, “Explicitly allow colleges to enroll community service students in otherwise state-supported credit classes, where there is excess capacity in those classes.” **CCA does not know what this sentence means. We feel further explanation is needed so all parties will have an acceptable interpretation of the intent of such language.**

Page 38 states regarding amending Title 5, “Students having the course in their education plan would pay the credit enrollment fee, while students not having the course in their education plan would pay a fee covering the full cost of instruction.” **CCA believes this is asking for a dual track fee structure for the community college students and that policy should not take place. This rings of AB 515 (Brownley).**

Page 38 states, “Adopt Recommendation 7.1 to increase the statutory authority of the CCC Chancellor’s Office thus allowing for oversight regarding course offerings as well as dissemination of enrollment management best practices for establishing community education programs that respond to community needs while also providing a source of income to the campus.” **CCA believes this recommendation completely alters the Mission Statement for California community colleges and removes autonomy from the local 72 districts.**

Page 39 states, “Conservative estimates from national researchers show that 60% of all entering college students assess as needing basic skills remediation.” **CCA feels this statistic is not clear and does not delineate whether a student has entered a college program at a two or four year institution. Statistics cited earlier in the report specific to California community college students suggest the need for remediation for these students is between 70-90 percent.**

Page 39 states, “According to data compiled for the Basic Skills Supplement to the ARCC Report (March 2011), only 300,000 students (approximately 10 percent of all community college students) are enrolled in basic skills coursework in any given year.” **CCA believes that this statistic does not prove the point it is designed to prove. If 90% are not taking the classes, what percentage of them are passing their courses?**

Page 40 states, “Central to the creation and implementation of a cohesive framework for the delivery of basic skills is the use of professional development.” **CCA believes that training in the area of professional development is a crucial part of faculty involvement. CCA believes that the funds outside of the 50% spent on classroom instruction should be used for this purpose. CCA also believes that flex day activities/funds can be spent for such activities.**

Page 41 states, “It is important to note that approximately 68 percent of entering CSU freshman requires remediation...” **CCA believes this statistic documents that even in the CSU system, students arrive unprepared for college work. Certainly this statistic documents the fact that students testing high enough to be admitted to the CSU system are not ready either. There is no enforcement mechanism to require K-12 to take on the responsibility to see these students are college ready.**

Page 42 states, “The task force believes that the community college system must foster more effective basic skills instruction... For example: (1) the use of learning communities: (2) modularized instruction: (3) intensive instruction: (4) supplemental instruction: (5) contextualized leaning – particularly within Career Technical Education Programs: and (6) team teaching, all illustrate new and innovate ways of teaching adults.” **CCA believes in order for this recommendation to materialize, collective bargaining of such work shall be required. Also, the teaching modalities expressed are certainly not new. They may be called innovative, but much of the faculty already embrace them and participate in such teaching.**

Page 42 states under Requirements for Implementation, “ Authorize the reallocation of Basic Skills Initiative (BSI) dollars in the annual Budget Act...Target a fixed portion of the money to specifically incentivize faculty redesign of curriculum and support innovations in basic skills instruction.” **CCA must stand opposed-to the shifting of Prop 98 funds into venues that are not guaranteed to faculty and students. Current unrestricted funds going to colleges are subject to collective bargaining so that more than just administration can determine how best to spend these funds.**

Page 42 states that under current regulation (Title V) apportionment can only be claimed for Supplemental Instruction provided through a Learning Communities if the hours of instruction are tied to a specific course and the hours are laid out in the course outline... given that the needs of Basic Skills Students varied and are hard to predict such restriction prevent colleges from funding this form of support for Basic Skill Students” **CCA believes that instruction in all forms including Supplemental Instruction must be done by faculty.**

Page 44 states, “The community colleges, with their K-12 and community-based partners, should develop a clear strategy to respond to the continuum of need in order to move student from educational basic skills to career and college readiness.” **CCA believes this recommendation is not clear. What type of documentation exist that finds these students in basic skills and career classes want to proceed past these classes? Who are the community-based partners?**

Page 47 states, “Ed Code 84890 allowed community colleges to use up to 15 days per year for professional development.” **CCA believes this use of flex days is a collective bargaining issue. Districts need to bargain with faculty and staff utilization of flex day participation.**

Page 50 states, “Amend statute and Title 5 regulations to authorize the Chancellor’s Office and/or BOG to mandate the use of professional development to address state objectives, thus requiring that colleges link mandatory professional development activities to a set of statewide objectives and then measure movement towards those objectives.” **CCA stands firm that flex days are collective bargaining issues and must be negotiated. Also, any measurement of movement towards those objectives could not have any part of faculty evaluation components without negotiation.**

Page 53 states, “the CCC is subject to state civil service hiring regulations. In some cases, this prevents the Chancellor’s Office from hiring the most qualified job applicants either because of the technicalities of the hiring process or because of salary limitations imposed by the state civil service system.” **CCA believes these types of restrictions are part of the balance of powers within the system that has at the heart of the program, local control. There was no discussion outlining the technicalities that are faced in the hiring process. Additional compensation for the Chancellor’s Office would diminish the funds provided to faculty and students furthering the division of Prop 98 funds.**

Page 54 states, “Without more authority in the Chancellor’s Office to help colleges implement these recommendations and hold them accountable for positive change, the impact of the recommendations contained within this report will be substantially weakened.” **CCA believes that by providing certain powers to the Chancellor’s Office, there is no enforcement mechanism outlined within the recommendations that guarantees positive movement for suggested outcomes based funding.**

Page 55 states under Requirements for Implementation, “Revise funding for the Chancellor’s Office by financing the office through alternative means, possibly through the use of ongoing Proposition 98 funding, to be taken from the community colleges share of the Proposition 98 guarantee, or a fee based system.” **CCA believes that by allowing funds to be taken to run the Chancellor’s Office from Prop 98 funds we weaken education for students attending the California community colleges. CCA believes that any additional fee based funding establishes a dual tuition fee structure that will adversely affect the most vulnerable students and those who can least afford college.**

Page 55 states, “Retain annual current Budget Act authority appropriating funds for the academic senate and add budget authority for the student senate because they are critical to the shared governance process.” **CCA believes there has been no discussion to eliminate or cut the funding for the statewide academic senate. However, there is a concern regarding using Prop 98 funding for the student senate because each one of the 112 colleges has associated student funds that could be used for such purposes.**

Page 56 states, “The Chancellor’s Office will implement robust accountability reporting (via a publicly understandable “score card” per recommendation 7.3), which will include progress made on intermediate measures of student success as well as ultimate outcomes.” **CCA believes this new “robust accountability reporting” may not be in the best interest of students or faculty. There is no documentation that such an approach will lead to a positive outcome for student success. The “ultimate outcomes” part of this statement sounds much like outcomes based funding which later in the report is claimed not to be part of the recommendations. Similar programs in the k-12 schools have not improved student success attested to by the fact that incoming community college students still need basic skills classes.**

Page 57 states, “This new score card would be built on the existing Accountability Reporting for Community Colleges (ARCC), our statewide data collection and reporting system.” **CCA is concerned about this statement and the validity of the statement. If this system already exists, why are we not using it at this time?**

Page 58 states, “Amend Title 5 to require local boards to discuss the score card at a public hearing and certify its content.” **CCA believes that such a requirement would constitute a change in current regulations and would mandate requirements to the 72 local districts to amend their policies and practices. Again, CCA is concerned there is no enforcement mechanism without a funding mandate change which would take legislative action changing current laws.**

Page 59 states, “Further, robust data would better enable faculty members to incorporate post-enrollment student outcomes into their curriculum development.” **CCA believes this is an administrative version of Student Learning Outcomes with no enforcement mechanism. Districts would try to bypass the collective bargaining contracts because of new power provided to the Chancellor’s Office to seek such information gathering techniques from individual colleges. Certainly CCA believes that such a mandate would force faculty to assume additional duties and thus be entitled to additional compensation under the collective bargaining contract.**

Page 63 states, “Over time, the Legislature, often at the urging of the community college system, has developed categorical programs to address specific priorities and concerns.” **CCA believes such requests from legislative intervention took place because the community college system (administration) did not use funds to support programs and thus did not meet the needs of students when these programs were implemented. CCA believes that funds established to assist part-time faculty who teach over 50% of the students in California community colleges (and up to 70% at some colleges) were overlooked year after year by the districts. Certainly there have been less funds spent in this category for quite a while.**

Page 64 states, “In exchange for this added flexibility, districts will be subject to additional performance review based on specified student and institutional metrics.” **CCA believes this statement is yet a different way to suggest that recommendations would result in performance based funding. CCA believes this is not the way to increase student success.**

Page 66 states, “At the heart of the Student Success Plan is the need to improve and expand core student support services such as diagnostic assessments, orientation, and education planning in order to help students successfully navigate the community college environment...(It) will require reprioritization of resources at the state and local levels, increased use of innovative technologies, as well as additional state investment.” **CCA believes that without enforcement mechanisms in place (that must be negotiated within the collective bargaining contract), little progress will be made. Also, CCA believes that without additional funding (not provided for within the recommendations or guaranteed) implementation of many key elements of the plan is doubtful and not likely to take place.**

Page 68 states, “Establish an alternative funding model to encourage innovation and flexibility in the delivery of basic skills instruction.” **CCA believes that this statement at face value cannot be met because there is no enforcement mechanism provided in the recommendations. CCA also believes that to deviate from the traditional FTES allocation formula to one that “successfully moves students from below college level to college level” might tempt placement of students into classes to comply with what might look like advancement but in reality would not have any assurance it is working.**

Page 69 states, “Amend statute and annual Budget Act to provide dedicated funding and funding authority.” **CCA believes this continued recommendation of altering the funding of Prop 98 funds is detrimental to faculty and students. CCA believes this is a violation of the 50% law as well.**

Page 70 states in Recommendation 8.4, “Do not implement outcomes-based funding at this time.” **CCA believes that the first 21 recommendations were predicated on funding shifts to an outcomes based funding model. Without such deviation, there is no outlined manner to obtain funding that would support the recommendations. CCA believes that in those states where outcomes-based funding was implemented, what was promised as meeting student success was minimal at best. CCA agrees that this approach has at least three major limitations found on page 70 of the recommendations of the task force which include: “(1) community colleges might “cream” students in order to improve success rates; (2) colleges serving more disadvantaged population might be financially penalized; and (3) that increased funding volatility might actually undermine the ability of colleges to plan and support effective programs.”**

Page 71 states, “the majority of the Task Force members did not support such a proposal (outcomes-based funding) at this time. For many...the lack of evidence demonstrating that outcome-based funding made a positive impact on student success was an important factor in their decision to reject implementing outcome-based funding at this time.” **CCA believes the Task Force made a wise and sound decision to not recommend outcomes-based funding. Without a specified and collectively bargained approach to funding at the 72 districts, CCA believes the Task Force learned much but would be prudent to take back the findings to the districts, seek suggestions concerning the issues discussed, and negotiate with collective bargaining agents at the local chapters those issues that can help students become successful.**

Questions CCA believes need to be answered regarding statements made within the document:

1. Page 8, How many of our students meet the poverty level?
2. Page 8, How many of our students attend more than one college?
3. Page 19, What are the high cost of assessment instruments for each of the colleges?
4. Page 19, How many colleges have inefficient test administration?
5. Page 20, What percentage of students entering community colleges with the electronic application CCC Apply?
6. Page 21, What percentage of the California community college students is self-directed and have the skills and resources to self-direct themselves?
7. Page 25, How was the cost of \$12 million arrived at for the const to centralize technology?
8. Page 31, What percent of students within the California Community Colleges take one, two, or three courses?
9. Page 32, How was this figure developed?
10. Page 34, How many California Community College students work full-time?
11. Page 34, How many California Community College students enroll to upgrade their job skills?
12. Page 35, How many students opt out of following suggested prerequisites or co-requisites?
13. Page 62, How much modest new funds will be needed to gain the wants of the student outcomes program identified?
14. Page 62, How much reallocation of funding would be necessary to gain the wants of the student outcomes program identified?

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